

Responder no.:**REDACTED COMMENTS*****Disclaimer:***

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Please note that spellings and/or typos and irregular spacings are likely to be a result of the compiling (copy and paste or typing).

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FEEDBACK STARTS BELOW:

These comments are submitted by XX. We have lived here since XX, so we have a good understanding of what makes these Hampshire downland villages so special. XX. We have read the draft NDP with interest and recognise the huge amount of time and work that has gone into producing it. We understand the desirability of adopting an agreed NDP. We have the following comments on the current draft.

The proposed sites are too few in number. The proposal is to have three phases, each of five years in duration, delivering 11 to 14 dwellings in each phase (Policies HI, H6 and H10). Five sites are listed in H6 but KS6, KS7 and SHELLA 81 are too small to deliver the required 11 dwellings. If any of the proposed sites fails to proceed for any reason, at detailed planning or before that stage is reached, there is no room to manoeuvre within the plan. It would be more sensible to increase the pool of sites, given that initially there were 13 or 14 potential development sites under consideration and the reasons for not selecting certain sites are unclear or open to challenge - see below.

The site selection process is unclear and possibly flawed. The weighting given to different criteria seems unreasonable or counter-intuitive. Conservation issues appear to have ranked very low (all the five proposed sites are in Conservation areas or next to listed buildings.). Landscape issues were given as reasons for not proceeding with certain sites (egSHELAA 78 and 168/214) but landscape issues are particularly difficult to assess scientifically. It seems that the view from the How Park ridge in the NW was given greater weight than other important views of the village, for example from the top of Red Bank, which is on the Clarendon Way and therefore regularly walked, and from the NE approach. The proposed developments at the E end of the village (KS5, KS7 and SHELAA 81 for ' example) would be highly visible from Red Bank or the NE (where there is the road from Stockbridge and a footpath). They would also be visible from the NW ridge. Objectively it cannot be said that landscape issues rule out SHELAA 78 and 168/214 but permit KSS, KS7 or SHELAA 81. Certain sites were also said to be too far away from the centre of the village and its facilities. A look at the map will show that KS7 and SHELAA 81 are as distant from the village hall as SHELAA 54.

The flaws in the site assessment process should be addressed in a further review carried out in parallel with the Strategic Environmental Assessment and the Flood Zone work (see below). This will produce a more defensible Plan.

The land behind Spencers Farm and Manor Farm House up to Pine Mead should be designated a LAGS. This description of the site, which lies west of New Lane, is taken from the Green Space document. In that document sites are marked against LAGS criteria and this site scored a tick for all criteria. However it has not been designated as an LAGS, whereas sites with a lower number of ticks have been proposed as LAGS. This area was originally an Important Open Area in planning terms, a category now replaced by LAGS under the NPPF. As the Green Space analysis shows it possesses all the characteristics required of a LAGS. It provides an attractive and open setting marking the transition from the built environment to open farmland and it includes a footpath which is used by village residents and other walkers. The land is a key feature of the landscape when approaching from the east or north, and when viewed from the Clarendon Way, whether from the How Park ridge or Red Bank. To the south there are important historic buildings (Manor Farm House and The Long Barn included). As the Test Valley Conservation Officer stated: 'The preserved settings of the listed buildings are... an important part of both their character and special interest and the quality of the conservation area' [Planning application 16/03029/FULLS].document sites are marked against LAGS criteria and this site scored a tick for all criteria. However it has not been designated as an LAGS, whereas sites with a lower number of ticks have been proposed as LAGS. Designating this site as a LAGS would be consistent with the objectives of the NDP: 'A key requirement from Parishioners was to protect and enhance our natural and historic environment which includes the conservation area, its listed buildings and the numerous rural views'.

Further work on site analysis should be carried on in parallel with the SEA and Flood Zone study. The Parish Council has already agreed to commission a Strategic Environmental Assessment following a request from Historic England and a determination by Test Valley BC on 23 May 2018. The letter dated 2 May 2018 from Historic England to Test Valley BC comments: 'According to our records, all five sites are within or within the setting of the King's Somborne Conservation Area and all but one (KSS) are within the setting of one or more listed buildings. Although the number of dwellings on each site may not be high, we consider that the development of these sites therefore has the potential to harm the special interest, character and appearance of the conservation area and significance of listed buildings, as we surmised in our previous letter.' In the same letter they state: 'As we believe that the proposed allocation sites have not previously been subject to SEA eg through the local plan process, we believe that a proportionate, focused, SEA of the Neighbourhood Plan is required. The SEA should demonstrate why these sites have been selected rather than other potential sites, and would result in a more robust Plan.'

The requirement to demonstrate why the five sites have been chosen in preference to other potential sites means that the SEA will need to cover all the original options (13 sites). Whilst this work and the Flood Zone study are being carried out it would not be appropriate to move the draft NDP on to the next stage and the additional work on site analysis and identification of LAGS can be conducted in parallel with the required SEA. This will generate a better and more robust Plan, as Historic England point out.