

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

There are more than 65 feedback responders, with some sending in multiple documents and responses. Many reaching more than 3 pages and including a lot of technical information.

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Some editorial amendments or deletions have been made and in some case this includes whole sections of submitted documents including sections of prefaces, context and/or background information, (particularly provided by consultants) has been removed. This has been done purely in an attempt to make the document more readable, but no actual feedback on the NDP has been removed.

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

If you would like to check your own feedback or have any queries with regards to this document, please email clerk@kingsomborne-pc.gov.uk.

FEEDBACK STARTS BELOW:

The NDP is underpinned by a Landscape Assessment written by the consultancy arm of the South Downs National Parks Authority. A fee proposal was sent to KSPC/the NDP steering committee to outline the scope of the work undertaken, costs and timescales. To review all 10 sites the stages agreed with the Parks Authority were: Desktop review- 1.0 day, Preparation for site visit - 0.5 day, 10 site visits - 1.0 day, Report writing- 1.0 day.

It is submitted that the time spent on site was inadequate to cover 10 locations. Assuming a 7 hour effective day (and excluding travel time between sites) it suggests a total analysis time of around 40 minutes per site. It is accepted that the work was carried out by two consultants but it is assumed they worked in tandem. During their one day visit to King's Somborne the consultancy team attempted to produce a high level summary of the following characteristics for each site "Historic continuity, Visibility, Landscape value, Landscape capacity, Contribution to settlement pattern, Sense of place". It's surprising that they felt this work could be carried out, in the limited time they allowed, without any engagement with village residents. As a result there are mistakes in their analysis/conclusions.

In the SDNPA report KS3 is described as "having a moderate sense of place and low visibility in wider views and is largely only publicly visible from Froghole Lane." However, the site is visible from the Clarendon Way (which follows the field line rather than Cow Drove Road) and, to be consistent with other sites under consideration (KS1 and KS4), should be categorised as having high visibility. KS1 and KS4 were disqualified on this basis alone. In addition, the view from the top of Froghole Lane across the valley (including parts of KS3) was identified as in need of protection in the 1987 Conservation Area map. The impact of this change would mean that KS3 should be rated as having a high sense of place and its capacity would be reduced from moderate to low. On this basis it is submitted that KS3 should be disqualified.

In relation to KS3 the South Downs report makes the following observation "development of the site would contribute positively to the valley bottom, historic settlement pattern balanced against the sensitivities identified.." This conclusion is in error. The historic, linear settlement pattern of the village has mainly been to on the south side of the bourne, frequently on or just below the 35m contour following the track of both the A3057 and Winchester Road. To the west of Cow Drove Hill there has only been one house built on the north side of the bourne as far as Horsebridge and well beyond (thereafter the track of the bourne is merged with other tributaries to the Test itself). The absence of development in land to the north of the bourne is clear and, in all likelihood, his settlement pattern derives from: Flood risks on northern sites. The South Downs report confirms that KS3 is a functional floodplain.

Accessibility – road links to Romsey, Winchester and Stockbridge. Sites to the north of the bourne are not well connected to the village community/services. The argument, based on anecdotal evidence, of a building in the “top right” corner of KS3 on the 1910 map is hardly compelling evidence to justify development now. There is equally strong anecdotal evidence that these may have been simply storage sheds used by labourers. Even if evidence of previous occupation exists it’s quite likely the residents abandoned the KS3 site due to flood problems! There is no justifiable argument to support development on the north side of the bourne, the conclusions contained in the South Downs report are incorrect, KS3 does not fit into the historic settlement pattern of the village. On this basis KS3 should be disqualified from the NDP. The fee proposal made to KSPC by South Downs National Parks Authority (before conducting any site visits or desk analysis) states: “We are able to interpret evidence as it applies to local areas ensuring the NDP takers into account its historic environment, landscape character, biodiversity etc., while meeting the needs of local people and having the best chance of passing at referendum.” This comment is revealing as it reveals a bias in the consultancy approach which seems to be entirely focused on achieving success in a referendum. It is submitted that this assertion could only properly be made after their analysis had been

At the first public consultation meeting it was pointed out to the steering committee that slide 36 (detail of KS3) of its presentation did only highlighted one listed building (Froman’s Farm). On the north side of Romsey Road the following listed buildings are impacted by the development of KS3: Crown Hill Cottage, Willows, Sheppon, ,The Crown Inn, Yew Tree Cottage. This is a significant omission and it is unfortunate that the committee did not correct this mistake before the three following consultation meetings. As a result many villagers may not have fully understood the proper context of the NDP’s recommendations for KS3. It is submitted that these buildings partly derive their individual “sense of place” from KS3 and for this reason KS3 should be disqualified.

Any development of KS3 would be in breach of planning policy E5. “Any new multi-home development is to be sited close to other built-up landscape such that it is a natural extension of the existing village, rather than as a distinct separate development.” The stated rationale for this (Landscape and Environment 1.3): “This will not stand out as new development but blend with existing buildings. This will look harmonious within the wider countryside.” The stated intention to develop KS3 on, or just below, the 40m contour will only connect with a small number of houses at the entrance off Cow Drove Hill. It will be a cul-de-sac which will be markedly different to existing houses closest to the site. The proposed houses will not have any connection with the village or to existing residents. Note: HCC has advised that any attempt to create an additional access point to Froghole Lane (for example footpath access from the KS 3 development) or create additional rights of way over the track would be in prohibited under the Natural Environment Rural Communities Act 2006. The committee should be prepared to apply its own stated policy in this respect and also understand the limited access rights that exist to Froghole Lane under the provisions of NERC. KS3 should be disqualified.

It is submitted that the data from the parish survey clearly demonstrates that there is no additional housing need in the village. Of the respondents: 91% confirmed that their home was suitable for their needs, 75% see no change in their housing needs over the next 5 – 10 years. Only 7% (27 respondents) shared their home with an adult needing accommodation in the village. 371 respondents did not (93%). Less than 4% of respondents (14 people) had adults living at home who were on the housing list. 67% of respondents (269 replies) do not need a smaller home.

NDP summary 5.2 clearly states “many respondents wished to downsize.” This statement is inaccurate and should be withdrawn. It has been confirmed that the target number of new homes contained in the NDP is not a requirement imposed (or agreed) by TVBC. The NDP is not based on an accurate assessment of housing needs and has over estimated the number of new builds required. Additionally, it is understood that so called “windfall” sites are included in determining the total number of houses built. This is contrary to the impression garnered by many villagers at the consultation presentations. One resident pointed out that, over the last 15 years, so called windfall sites had (in themselves) increased the housing stock by around 50. Based in these two factors it seems likely that the steering committee has underestimated the impact of windfall sites and significantly over estimated the housing requirement. The KSPC questionnaire (Q11) identified the views from How Park, Cow Drove Hill as having attractive views of the village. Almost 94% of respondents supported the notion of identifying and preserving surrounding farmland. KS3 is clearly encompassed by the scope of this question and full account needs to be taken of this. KS3 should be disqualified.

All parish councils have a legal obligation to protect the environment and biodiversity. The NDP also states that we need to “conserve open spaces”. KS3 has largely been untouched for many years with no pesticides/herbicides used. This “neglect” has created a diverse and well used wildlife habitat. Species regularly seen include: Bats (including Barbastelle bats from the Mottisfont colony). The riparian nature of the site make this a particularly suited feeding and roosting site; Owls – both barn and little varieties; Birds of prey; Kingfishers; Slow worms; Grass snakes; Field mice; Water voles; Stoats; Solitary and bumble bees. The abundant plant life also creates a habitat for butterflies and moths. In the context of King’s Somborne KS3 has a unique biodiversity which distinguishes it from other sites in the NDP. However, this has never been fully recognised and, from verbal comments, it seems to have become regarded as “derelict”. KSPC has attempted to create a similar environment on the three fields site but this has never been successful. KS3 should be protected in its entirety rather than destroyed by development.

KS1 and KS2 were rejected as suitable for development as they were rated as having an “orange” traffic light score for access. KS3 shares the same access route but has received a “green” score. The access rating for KS3 should be the same as KS1 and KS2 and it should also be eliminated. Under the provisions of the Natural Environment Rural Communities Act new pedestrian access to Froghole Lane will not be permitted. Pedestrian access to the village from KS3 will therefore be down Cow Drove Hill (no footpath) which is steep and frequently used by heavily laden lorries. Pedestrians from KS3 will have to cross the A3057 to access the shops/post office, school, church/Methodist chapel, pre-school, recreation field/play park, scout hut, recycling centre bus stop, village hall and the Epworth hall. Furthermore, the pavement towards the village is frequently blocked by parked cars, leaving pedestrians with no alternative but to walk against the stream of oncoming cars and lorries. For both parents with children and the elderly this crossing is dangerous due to the speed and volume of traffic and it is not difficult to foresee a tragic accident. Parked vehicles and commercial deliveries to Barker and Geary only add to these problems. KS3 does not provide safe access for either vehicles or pedestrians because is sited on the wrong side of the A3057 and should be disqualified.

Access to KS3 – road and pedestrian.

On the basis of consultation responses sent to Cllr Brock by TVBC on 23 May 2018 it is submitted that SEA and HRA are required for the proposed neighbourhood development plan. You have been formally advised by TVBC that its opinion is that: 1.the proposed NDP is likely to have significant environmental effects. 2.It cannot rule out a significant impact on habitat and an HRA is required. 3.Historic England has indicated that the development of the sites in the plan has the potential to “harm the special interest, character and appearance of the conservation area and significance of listed buildings.” It is understood that this statutory body will object to the current plan if these issues are not addressed to its satisfaction. 4.With regard to flood risk the environment agency has requested that, in accordance with NPPF para 100-102 you undertake a Sequential Test when allocating sites to ensure that development is directed to the areas of lowest flood risk. The steering committee has been advised that this work should be undertaken by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA). This seems to be material and it is surprising that this information was not disclosed to the recent village assembly and NDP consultation meetings. TVBC have advised the steering committee to seek professional guidance on this matter. It is appreciated that this may still be work in progress. However, it is submitted that the NDP should be revised to disclose this information, feedback should be made available to villagers as work progresses and the concerns should be aired publically.

On 2 May 2018 Historic England has made the following observations regarding the King’s Somborne NDP: “We are concerned that the development of the proposed sites would harm the significance of designated heritage assets, and would therefore be in direct conflict with policy E9 (conservation area). Three of the proposed development sites are on Greenfield sites within the Conservation Area.....we note that the 1987 Conservation Policy for King’s Somborne states: Certain open areas are identified within and adjacent to the conservation area as being important to the character of the village. Because of this, it is improbable that development will be permitted on them. The Borough Council would therefore wish to see them retained and enhanced accordingly where appropriate.”....“Pending the outcome of that SEA, we are very concerned at the proposed allocation of any sites identified as being important to the character and appearance of the village and conservation area and we would therefore be likely to object to their inclusion in the plan.” It would be helpful to understand the reason this information wasn’t fully disclosed at the recent consultation meetings. It seems to me that it is material and should be fully in the public domain.

Screening Opinion for Strategic Environmental Assessment and Habitats Regulations Assessment