

REDACTED COMMENTS

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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.

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FEEDBACK STARTS BELOW:

1.1.6 The KSNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.

1.1.7 The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and assist local authorities in delivering full objectively assessed needs (OAN) for housing. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the Framework or the Neighbourhood Plan Basic Conditions.

1.1.8 The KSNP should not seek to include policies in Neighbourhood Plans that have no planning basis or are inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision makers. Policies and proposals contained in the KSNP should be designed to add value to existing policies and national guidance, as opposed to replicating their requirements.

As a general point, the plan period of the KSNP is currently unclear, this will need clarifying so that it can be determined that the plan policies are appropriate and effective. If the plan period is set to align with the adopted Local Plan this should be set out explicitly.

XX concerned with the choice of wording in the vision and suggest that this does not set out a positive approach. The use of the term 'preserve' does not accord with the Framework, which only seeks for preservation in regards to Green Belt policy, which for the avoidance of doubt are not applicable to the Neighbourhood Plan Area. XX suggest this term is amended to state that landscape features and views will be recognised.

4.2.4 Further to our comments above regarding the vision, we suggest that the wording of these policies should be amended to accord with the Framework. The term 'preserve' should be modified to state 'Recognising'.

We strongly object to Policy E4 in seeking to restrict development to within the floor of the valley (generally below the 40m contour line). This is overly restrictive and it is not clear why this is considered to be the appropriate level that development should not be above as much of the undeveloped land below the 40m contour line is covered by Flood Zones 2 and 3. Using the Sequential Test, development that is not affected by Flood Zone should be favoured ahead of areas affected by Flood Zone. This policy would seek to add an unnecessary constraint on much of the undeveloped area around King's Somborne that is not affected by Flood Zone constraints, where development could reasonably be accommodated in King's Somborne. We suggest that this policy is deleted from the plan and any application for development assessed on its own merits by way of a site specific assessment of landscape and visual impacts.

Policy E6 states that proposals should be in accordance with the NDP's design guidance. We suggest that this reference is modified to state that development proposals should have regard to this document. There should be no requirement to be in accordance with a guidance document.

We consider that the requirement for new housing development to deliver 1.5 times the footprint of the proposed dwellings as open space as overly onerous. Whilst agreeing that provision of open space on a development is incumbent of good design this should not be of such a scale that a sites development potential could not be optimised. This directly conflicts with Paragraph 58 of the Framework which states that 'Planning policies and decisions should aim to ensure that developments... optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public spaces as part of developments) and support local facilities and transport networks.'

It is currently unclear if the proposed allocations have been assessed against this policy and would still be able to deliver the proposed levels of development whilst remaining in accordance with this policy. Further, the provision of Public Open Space is dealt with in greater detail in adopted Local Plan Policy LHW1 and as such we suggest this policy is removed from the plan.

Due to the nature of a number of the proposed site allocations in the KSNP, we do not believe this policy is strong enough to ensure that there will not be an adverse impact on the Conservation Area or Listed Buildings. At this time we have seen no evidence of a Heritage Assessment having been undertaken to support the proposed allocations within and adjacent to the Conservation Area. Without this evidence it can not be said that the proposed allocations are suitable and therefore deliverable. If this assessment was to be undertaken at a planning application stage it may well be demonstrated that a development proposal could not be delivered without having an adverse impact on the Conservation Area that could not be outweighed by the benefits of the proposed development. In such circumstances, planning permission is likely to be refused and the site would therefore be undeliverable.

Further to our point above, we have seen no evidence of a site-specific flood risk assessment having been undertaken nor a detailed sequential test to support the proposed allocations. Without these assessments being available and demonstrating that the development proposals can be satisfactorily developed they should not be allocated for development.

Having considered Appendix 2.1 Housing Numbers, we query why the housing target of the plan is in the range of 33 to 42 dwellings when the report indicates that the number of houses required over the next 15 years is 41. Whilst this figure may well change due to changing market conditions, this is the figure that evidence indicates the KSNP should deliver. The wording of this policy should be modified to reflect this.

Further, it is important that this figure is not seen as a maximum as this could cap otherwise sustainable development from coming forward. Setting this figure as a minimum would allow the plan to respond flexibly to any changing market conditions.

It is not clear why the conclusion has been derived at that the Plan should foresee 3 developments of 11-14 houses within distinct time bands of 5 years. The population forecasts should not be relied upon for setting a phased housing target. The only justification for a phased approach would be where infrastructure is required that could not be delivered until further in to the plan period. Once the housing target for the plan period has been derived, the strategy for how this could be delivered should be assessed. We suggest that the most sustainable option when considering the constraints in the Parish may be to deliver the housing target on one larger site. At this time it is not clear if this has been a consideration in the site selection.

We suggest that these policies are removed from the KSNP allowing the provision of affordable housing to be dealt with by Adopted Local Plan Policy COM7. As currently drafted the policies lack clarity and would be best dealt with by the Local Plan which was revised following the Written Ministerial Statement regarding Affordable Housing provision.

As the Framework states that policies should be clear and concise, and as this policy adds no further detail to that set out in the adopted Local Plan and we suggest that this policy is removed from the Plan.

This policy seeks for all developments to conform to the requirements of the King's Somborne Parish Council Design Guidance. By its very nature this document is merely guidance that development should have regard to, there should be no requirement for development to be in conformity with this document. We suggest an amendment to the wording of this policy that states that development should have regard to the Design Guidance.

This policy is seeking to introduce a requirement beyond the remit of neighbourhood plans and should be deleted.

4.2.19 Having considered the evidence to support the proposed allocations we have numerous concerns regarding the robustness of the site assessment.

4.2.20 At this time it is noted that access to a number of the sites is yet to be determined. Sites should only be allocated if there is a reasonable prospect of them delivering within the plan period. Without access being determined these sites should not be allocated within the neighbourhood plan.

4.2.21 Also we note that some of the proposed allocations are affected by flood risk with no guarantee that the quantum of development proposed could be delivered on land in Flood Zone 1. If development in Flood Zones 2 and 3 is necessary to deliver the number of dwellings required, a detailed Sequential Test is required, as such this document is currently insufficient.

4.2.22 Since the planning application (Reference: 16/02378) on land off Eldon Road, King's Somborne was refused the Environment Agency Flood Maps for Planning have been updated and there is no longer flood risk on the site. In light of the latest update to the flood risk maps the entirety of the site assessments should be revisited with the Sequential Test retaken. We contend that this will demonstrate that that site is therefore suitable for allocation, as a site that could reasonably be delivered outside areas of Flood Risk.

4.2.23 Further, many of the sites are either within or adjacent to the Conservation Area and therefore may impact on the heritage of King's Somborne. We contend that this has not been weighted sufficiently in the assessment of the sites and whilst there is currently a policy within the KSNP we do not consider this to be strong enough to ensure that there would not be an unacceptable level of harm to Listed Buildings or the Conservation Area. At this time we have seen no evidence of a Heritage Assessment to support the proposed allocations demonstrating how the sites can be developed without having an unacceptable impact on the Conservation Area and Listed Buildings.

4.2.24 We object to the reasoning behind the rejection of our site for inclusion within the neighbourhood plan. With our planning application we submitted a detailed technical Landscape and Visual Impact Assessment which concluded that our site could be developed without having an adverse impact on the surrounding landscape. This should therefore not be weighted against our site in the site assessment.

Noting the assessments that currently support the proposed housing mix, housing needs change over time and are likely to during the course of the plan period. We suggest that wording is added to this policy that the housing mix that is currently set out is preferred but not prescriptive acknowledging that needs change over time.

This policy is again seeking to implement a policy beyond the remit of neighbourhood plans and should be deleted from the neighbourhood plan.

This policy seeks for development to be carried out in distinct phases with no development commencing until completion of the previous phase. Seeking to phase development does not accord with the objectives of the Framework to significantly boost the supply of housing.

We are in the midst of a national housing crisis, at a time when the country is not building enough houses. Seeking to restrict further development until one scheme is completed is not a positive approach and this should be removed from the plan.

Noting that this policy seeks for development to provide good pedestrian access to both the Village School and Pre-School, our refused planning application (Reference: 16/02378) made provision for these links and should receive positive weighting in the site assessment process.

At this time it is unclear whether a Strategic Environmental Assessment Screening Report has been undertaken to determine whether a full SEA will be required. Due to the nature of some of the KSNP's proposed housing allocations being affected by flood risk and the proximity to the Conservation Area, we suggest that it is highly likely that a full SEA will be required. We suggest that the Regulation 14 consultation is repeated should it be determined a full SEA is required once this document has been published.

The preparation of neighbourhood plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.

The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a neighbourhood plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.

A developer is promoting land off Eldon Road, King's Somborne for residential development. The development of the 4.06 hectare site could accommodate 60 dwellings (including up to 40% affordable housing), supported by structural landscaping, informal public open space, children's play area and surface water management.

The site lies adjacent to the existing residential development on the edge of King's Somborne. The site is well contained with defensible boundaries such as mature hedgerows and trees along Eldon Road and Furzedown Road.

There is a planning application on the site (Reference: 16/02378) supported by a suite of technical information, available on the Test Valley Borough Council website.

The benefits of the scheme would include:

- The provision of 60 market and affordable homes
- 40% affordable homes provided on site (up to 24 units)
- Informal public open space including recreational footpath routes and an equipped area of play
- Footpath link provided to the primary school
- A net gain in biodiversity
- Economic benefits including increased expenditure within the local area and the creation of 60 full-time equivalent jobs annually throughout the construction phase.
- The site is not affected by flood risk and does not impact on local heritage.

1.1.5 A location plan can be found at appendix 1 of this submission.

land off Eldon Road has been submitted as a site that is in a sustainable location and deliverable. We contend that the proposed allocations do not demonstrate sustainability merits over and above that submission and suggest that in fact when considering the constraints affecting the proposed allocations the Eldon road site should be the preferred choice.

We have seen no evidence to demonstrate that a SEA Screening Report has been undertaken and suggest that the outcomes of this report will demonstrate that a full SEA will be required. Further work is required to support the allocations and we suggest that the Regulation 14 consultation is repeated once this work has been undertaken, once the deficiencies of the KSNP have been rectified. We wish to be notified when this consultation is undertaken.

We invite the Parish Council to get in touch regarding development proposals on land off Eldon Road, King's Somborne and are happy to discuss potential options for the delivery of a scheme supported by the local community.