

King's Somborne Parish Council

Evidence Base and Policy Development

Final Report

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Quality information

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Disclaimer

This document is intended to aid the preparation of the Neighbourhood Plan and can be used to guide decision making and as evidence to support Plan policies if the Qualifying Body (QB) so chooses. It is not a neighbourhood plan policy document. It is a 'snapshot' in time and may become superseded by more recent information. King's Somborne Parish Council is not bound to accept its conclusions. If any party can demonstrate that any of the evidence presented herein is inaccurate or out of date, such evidence can be presented to the Neighbourhood Plan at the consultation stage. Where evidence from elsewhere conflicts with this report, the QB should decide what policy position to take in the Neighbourhood Plan and that judgement should be documented so that it can be defended at the Examination stage.

Table of Contents

Executive Summary	6
Introduction	6
General findings.....	7
Headline summary of policy specific findings (full details in Appendix 1).....	7
1. Introduction	17
1.1 About this document.....	17
1.2 Local context	18
1.3 Planning Policy and Evidence Base	18
1.3.1 Test Valley Revised Local Plan.....	18
1.3.2 King's Somborne Conservation Area Appraisal and Management Plan ..	19
1.3.3 Neighbourhood plan activity	20
2. Assessment methodology.....	22
2.1 Assessment of evidence base.....	22
2.2 Assessment of evidence base (see also Appendix 1)	23
2.3 Policy review (see also Appendix 1).....	24
2.4 Policy wording	24
2.5 About Appendix 1	25
2.6 About Appendix 2	26
2.7 About Appendix 3	26
2.8 About Appendix 4	27
3. Conclusions and Recommendations	28
3.1 General findings	28
3.2 Headline summary of policy specific findings (full details in Appendix 1).....	28
3.3 Recommendations for next steps	38
Appendix 1: Detailed policy and evidence review	39
Appendix 2: AECOM technical review of South Downs Landscape Assessment	83
Introduction and Purpose.....	83
Sources of Information.....	83
Limitations and Assumptions	83
Assessing Landscape Sensitivity	84
Assessing Landscape Value	85
Indicative Landscape Capacity	85
Summary	85
Appendix 3: Relevant 'made' neighbourhood plan policies	87
Appendix 4: Further guidance on neighbourhood planning policy	88

Abbreviations used in the report

Abbreviation

Defra	Department of the Environment, Food and Rural Affairs
EA	Environment Agency
EBPD	Evidence Base and Policy Development
GLVIA3	Guidelines for Landscape and Visual Impact Assessment 3rd Edition
HCC	Hampshire County Council
HLCA	Historic Landscape Character Assessment
HRA	Habitats Regulations Assessment
KSNP	King's Somborne Neighbourhood Plan
KSPC	King's Somborne Parish Council
LCS	Landscape Capacity Study
LGS	Local Green Space
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
MHCLG	Ministry of Housing, Communities and Local Government
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework
RLP	Revised Local Plan
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SDNPC	South Downs National Park Consultancy
SEA	Strategic Environmental Assessment
SINC	Site of Importance for Nature Conservation
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage System
TIN	Technical Information Note
TVBC	Test Valley Borough Council
ZTV	Zone of Theoretical Visibility (used in landscape assessment of sites to indicate area from which development on the site would be theoretically visible)

Executive Summary

Introduction

The 2011 Localism Act introduced neighbourhood planning, allowing parishes or Parish Councils across England to develop and adopt legally binding development plans for their neighbourhood area.

King's Somborne Parish Council (henceforth KSPC) is developing a neighbourhood plan for the parish, which lies in Test Valley Borough in Hampshire.

As part of the development of the Neighbourhood Plan and its evidence base, KSPC applied successfully to Locality for support from AECOM as part of its Supporting Communities in Neighbourhood Planning project.

This document comprises an Evidence Base and Policy Development (EBPD) study provided by AECOM to KSPC.

The aim of the EBPD is to review the existing evidence base and policies, identify any gaps within them, and then present policy options and recommendations based not only on the existing evidence base and policies but also on any additional relevant information that applies.

The EBPD reviews and comments on emerging policies, in particular in terms of any amendments that may be required to ensure that the policies meet the Basic Conditions of neighbourhood planning.¹

The review of existing policies will be comprehensive, in that it will assess not only the policy text itself but also the evidence upon which that policy is based. It seeks to verify that:

- Evidence has been assembled from robust sources;
- Stakeholder-derived evidence has been considered in an inclusive way;
- Relevant third-party comments/issues have been addressed;
- Reasonable conclusions have been drawn from that evidence;
- All useful evidence available has been referenced;
- There are no evidence gaps that need to be filled;
- The draft policy is clearly written, distinct from and in general conformity with the strategic policies in the development plan, which for neighbourhood plans in Test Valley comprises the Revised Local Plan adopted in 2016; and
- The policy meets the Basic Conditions.

If the AECOM review finds that the draft policy or the evidence on which it is based has any potential for strengthening or improvement, recommendations in this regard will be clearly set out.

¹ Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

General findings

In developing planning policies for the emerging Neighbourhood Plan, KSPC should ensure that they do not merely repeat existing national and local planning policies. In a robust neighbourhood plan, neighbourhood policies would either increase the effectiveness and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy void.

However, where KSPC supports TVBC's existing policy approach this can simply be referenced in supporting text rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) to monitor effects of implementation is another way of ensuring the neighbourhood plan can add value over and above local and national policies.

All evidence that KSPC relies on in developing its planning policies should be properly documented within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points which will help demonstrate how robust the policy is. The supporting text, which should stand alone from and be more clearly differentiated from the policy text itself, should explain why the policy is required and signpost the reader to the plan's evidence base where they can find additional information. Policy justification should also reference higher-level evidence and policy, for example from the Test Valley and South West Hampshire Joint Local Plan and The Test Valley Plan and/or their evidence base documents and policies, as this will help support the policies and provide further justification.

In some cases, additional evidence work may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes beyond the local plan (e.g. in terms of standards), the more evidence is required. It is recommended that the Parish Council conducts a further check of its draft final policies to ensure they are adding value to the Local Plan and are locally specific to the neighbourhood. Ideally this should be done with the LPA's Neighbourhood Planning Officer.

Headline summary of policy specific findings (full details in Appendix 1)

KS/E1 Preserving Landscape Features, Views and Surrounding Farmland

The policy appears in principle to meet the Basic Conditions but may need some future rewording (probably minor) given the recommendation that the South Downs National Park Landscape Assessment should not be relied on.

Specifically, in their Technical Review (see Appendix 2), AECOM landscape specialists agree with KSPC's significant concerns about the Landscape Assessment's approach and methodology. They do not consider its conclusions should be relied upon. This means that the sites allocated on the basis, in part, of the Landscape Assessment should be reassessed, which AECOM is now doing. KSPC can have confidence that AECOM's landscape conclusions in the Site Assessment will be more robust than those in the Landscape Assessment but should also note that neither the Site Assessment nor this EBPD report are direct substitutes for a full landscape assessment.

Nevertheless, depending on their views on the AECOM Site Assessment, it may be that TVBC consider that the landscape evidence within it is sufficient to make the

allocations robust, without the need for a new or repaired standalone Landscape Assessment. On the other hand, if the Council considers that a new Landscape Assessment is still required, then KSPC have some options to consider- either requiring South Downs to rework their existing assessment in light of the AECOM recommendations in this report and the Site Assessment, or to commission a third party to carry one out, also having regard to AECOM's recommendations in this and the Site Assessment report.

To determine whether or not a replacement landscape study may be required, AECOM reviewed all 'made' (i.e. adopted) neighbourhood plans that allocate sites across Test Valley and neighbouring (but comparable) Basingstoke and Deane and Winchester council areas. The neighbouring authority areas were reviewed because none of Test Valley's made neighbourhood plans allocate sites. The findings of this exercise was that of the seven made neighbourhood plans across the study area that allocate sites, none of the five in Basingstoke and Deane (Kingsclere, Oakley and Deane, Overton, Sherborne St. John and Whitchurch) commissioned standalone landscape evidence, rather using landscape evidence from the Local Plan evidence base alone.

However, both such neighbourhood plans in Winchester (Denmead and Twyford) did commission their own parish-specific landscape assessment. The conclusion here is that neighbourhood plans can be adopted whether or not they have commissioned parish-specific landscape assessment, and whether or not to do so likely depends (in part, at least) on the quality, relevance and/or availability of landscape evidence already available at local plan level.

Greater clarity is needed on whether or not the policy has been informed by the Test Valley Community Landscape Project, and if not, why not.

The first sentence of section 1 of the policy effectively repeats RLP policy and can thus be deleted. AECOM agrees with the TVBC suggestion that 'to help justify this policy it would be beneficial to highlight/justify key viewpoints or features in the evidence base that support the 40m reference'. It is recommended that photographs from key viewpoints on publicly accessible land, accompanied by explanations and annotations, be included in the evidence base supporting this policy (whether in a replacement Landscape Assessment or otherwise).

KS/E2 Horsebridge to King's Somborne Local Gap

This policy is likely to meet the Basic Conditions and is in conformity with local and national policy.

It is recommended that the SINC boundaries be added to the Figure 2 map, references to the more distant Figure 3 be removed, and additions made to the supporting text to explain how the SINC boundaries inform the Local Gap boundary.

Reference to the NPPF (specifically, paragraph 127 c) and d)) should be added to the supporting text. Although the NPPF does not specifically refer to the need to avoid coalescence, it does require planning policies to be sympathetic to local character and history, which here could be interpreted as the character and history of King's Somborne and Horsebridge as two separate settlements.

KS/E3 Local Green Space

The policy is on track to meet the Basic Conditions. However, it is subject to the results of AECOM's separate assessment of Local Green Spaces.

Note also that its key evidence document, Appendix 1.2, uses incorrect terminology throughout and does not reference national policy. The correct term to use is 'local green space', not 'green space' or 'local area of green space'. This may seem like a minor point, but it is crucial to demonstrate that the Plan evidence base has been prepared with appropriate reference to national and local policy. In the same way, the Appendix needs to reference the NPPF.

It is difficult to cross-reference the sites in the table in the Assessment of Suitability section with the maps in Section 5. A final column should be added to the Section 4 table with the map reference from Section 5. It is not clear what the inset at the top left of the map on page 14 is showing.

In their Reg. 14 response, Historic England asked if it would be possible for this policy to be more specific about the historic significance of the local green spaces, and this remains a gap because it does not yet appear. This should, however, be referenced in the Appendix and/or the supporting text rather than in the policy itself.

If new sites are to be added or any to be deleted based on the conclusions of the AECOM assessment of Local Green Spaces, it is advisable to update the evidence base first before writing them into the policy; one solution could be to mention them in comments boxes rather than in the policy text itself.

KS/E5 Archaeology

The evidence referenced in the supporting text to the policy is appropriate, proportionate and rich in detail.

Part 2 needs to be aligned with national policy (NPPF paragraph 184), rather than seeking to preserve all potentially significant archaeological deposits in situ where possible.

In Part 3, the text should be reworded to state 'recording of archaeological remains that would be lost as part of development will not be regarded as offsetting their loss'. This would be much clearer for a development management officer to interpret and hence make the policy significantly more effective, as well as bringing it into line with local policy.

Part 1 of the policy is in conformity with local and national policy. With minor rewording, Parts 2 and 3 can be made in conformity as noted above.

KS/E6 Flooding and Water Management

The policy, in broad terms, appears to meet the Basic Conditions. The Flood Risk Study appears to be a robust, helpful source of evidence for it.

However, it is not clear why the policy text (engineering bricks to a height of 800mm above surrounding ground levels) departs from the Flood Risk Study's own recommendation (600mm above surrounding ground levels). If this is a typo, it should be corrected. If it is intentional, it needs justification.

The Sequential Test Report, unlike the Flood Risk Study, is really only applicable to the proposed specific site allocations, which are not covered by this policy. As such, reference to it can be removed from the supporting text.

TVBC comments at Reg. 14 supported the principle of providing locally specific information about parish watercourses.

KS/E6 currently sets out only some but not all of the recommendations of the Flood Risk Study. Although it is understood that this may be because the Flood Risk Study was commissioned only to assess specific allocated sites and not development in general, its more generic recommendations for flood mitigation would be equally valid for similar developments that may come forward on non-allocated sites.

The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of the river bank, and the design of any development within this area needs to be in line with their guidance.

Policy effectiveness would be improved if further parts could be added to it that set out these detailed recommendations (reworded slightly for proportionality and to apply only to developments requiring planning permission that deliver one or more net new dwellings, or comprise commercial development), including:

- the recommendation that developable areas be limited to Flood Zone 1;
- the requirement, where appropriate and proportionate, for detailed hydraulic modelling of Somborne Stream, or where this has already taken place, that it informs the development approach to flood mitigation;
- the requirement for groundwater monitoring to be undertaken as part of any ground investigation works, and that these works should inform foundation design and design of the drainage system;
- any Flood Risk Assessment, where required by TVBC and/or the EA, to be based on the findings of hydraulic modelling, and include a Drainage Strategy;
- the requirement for surface water discharge to be to Somborne Stream and restricted to greenfield runoff rates;
- the requirement, where appropriate, for attenuation storage systems designed to accommodate runoff during all storm events up to and including the 1 in 100 year plus 40% climate change event.
- the requirement, where appropriate, for below ground attenuation tanks or modular storage to be designed as sealed systems, to facilitate gravity drainage, and to prevent uplift (floatation) of the tanks when the groundwater table is high and to prevent ingress of groundwater; and
- the use of further flood mitigation measures should be considered where appropriate, including box planters, rainwater harvesting and water butts

KS/E7 Biodiversity

The policy is on track to meet the Basic Conditions but needs some minor amendments before submission.

The key conclusion of the Shadow HRA has been carried through clearly and effectively into the policy.

The policy wording is confusing. This can easily be solved by replacing 'support or are in close proximity to' with 'where development would impact on'. The second paragraph (covering impacts on Mottisfont Bats SAC) can be deleted as it is already required by the RLP (see paragraphs 7.34 and 7.35, which themselves restate national policy in any case).

There is no mention of considering the BAP Priority Habitat in either the supporting text or the policy itself, and the policy does not mention the potential for contributions from new development to enhance its value. AECOM understands from the Parish Council that reference to the BAP was omitted from the policy itself so as not to duplicate/overlap with Policy E5 in the Test Valley Replacement Local Plan (which is good practice), but to make this clear for the avoidance of doubt, policy E5 should be referenced in the supporting text if not in the policy itself.

The policy might be more effective if point 3 'development that contributes to the network of habitats identified in the Biodiversity Opportunity Area will be supported' were moved to be point 1 as it feels more like the main thrust/headline for the policy rather than lower down in the list.

Subject to the changes recommended above, the remainder of the policy is in general conformity with RLP Policies E5: Biodiversity and E6: Green Infrastructure.

KS/E8 The Somborne

The policy appears to meet the Basic Conditions.

The supporting text for the policy, in particular 3.31 and 3.32, is clear and strong. However, it needs to clearly reference data sources and provide relevant context, as well as quote relevant national policy.

Point d) of Part 1 of the policy can be deleted because it repeats RLP Policy E7: Water Management.

The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of any river bank, and the design of any development within this area needs to be in line with their guidance.

The policy is currently sitting in the Biodiversity section of the neighbourhood plan. It is understood why this is the case, but it may be more logical to move it to the Flooding and Water Management section just above.

Supported by the NPPF wording, the policy could be made more effective by adding the word 'character' to a). Furthermore, the policy would be made even more effective if Section 2 were deleted and simply merged into the text of 1 above the lettered points, thus: 'Development proposals that would adversely affect the following features of the Somborne, Park Stream, River Test and the River Test SSSI will not be supported.'

For similar reasons, the policy would be more effective if renamed 'The River Network' or similar rather than just 'The Somborne'.

KS/F2 Utilities

The policy is on track to meet the Basic Conditions.

The reference to national and local policy in the supporting text is helpful. As no specific comments were made at Reg.14 by relevant infrastructure providers, there is likely no need to reference any other sources.

The policy is more proportionate, effective and in conformity with national and local policy now that relevant TVBC comments at the Reg. 14 stage have been addressed.

The phrasing in part one of the policy is slightly unusual and the policy would be more effective if it were reworded- namely, rather than 'perpetuate the impact on', 'adversely impact' would be clearer. In addition, there is no technical evidence supporting the plan that reliability is affected by whether services are routed underground or not.

In comments on the draft report, the Parish Council again stated that underground cables are more reliable than overground. AECOM does not dispute this but, again, technical evidence needs to be cited to support this statement if it is to appear in the neighbourhood plan.

KS/H1 Quantity of New Homes Needed

The policy is on track to meet the Basic Conditions.

The Housing Need and Sites report appears robust in terms of quantity. AECOM checked with TVBC that the Council supports/remains comfortable with the quantity of new homes needed and the answer is that they are. As such, the quantity of homes needed is considered appropriate, because in practice in the neighbourhood planning system, Examiners tend to rely strongly on evidence of agreement between the LPA and the neighbourhood planners on quantity of homes needed, as long as that quantity is based on some evidence of need that the Council consider is robust, which in this case it is.

Rearrangement of supporting text and Plan sections is needed to better separate demand-side evidence (i.e. how many homes are needed in future) from supply-side evidence (i.e. the quantity and location of the land needed to accommodate those homes), as advised by national planning guidance.

On this basis, it is strongly recommended that the section heading for KS/H1 be renamed from 'quantity and location of new homes' to 'quantity and size of new homes' so that this section remains demand-side only. Likewise, all supply-side references should be removed from the supporting text here and instead added to the supporting text of the site allocations policies. At the same time, because housing mix is more of a demand-side than a supply-side issue, it is recommended that the whole of the housing mix section and Policy KS/H7 is moved into this section (after KS/H1 and its supporting text) before the Plan reader gets to the Site Allocations section following.

As worded, the policy is effective but requires amendments to be made to policy KS/H7 for consistency (which is further justification for the two policies being in the same section)

The mix of affordable houses required is a housing tenure issue rather than a housing type issue. Thus, the policy would be more effective if section 2 were reworded to state 'The type, size and tenure of homes....'

While supporting text in the neighbourhood plan mentions relevant RLP policies, the policy itself should state that the mix of affordable homes should have regard to RLP

policy COM7: Affordable Housing alongside any parish-specific evidence. Having regard to COM7 for housing allocations in neighbourhood plans is itself a requirement of RLP policy COM9: Community Led Development, so the latter policy could also be referenced.

KS/H7 Housing Mix

The policy needs minor amendment in order to meet the Basic Conditions.

The evidence of demand for detached homes, bungalows, starter homes and retirement housing set out in the supporting text has not been carried through into the policy itself, which as worded covers housing size only and not housing type. This could easily be remedied by rewording the final sentence of Part 2 as follows: 'The presumption will always be in favour of smaller homes, including detached smaller homes such as bungalows, and any other types of smaller dwelling with gardens suitable as starter homes or for retirement living'.

A public comment on the Reg. 14 consultation called for the Neighbourhood Plan to support self and custom-building. This policy would be the place to do so but currently there is no mention of this issue. While there is no requirement for the policy to support this objective, this would align with national policy and if there is a specific reason not to do so, it should be stated in the supporting text.

The percentage mix in the policy as worded is overly prescriptive as local needs are likely to fluctuate over the plan period. There should be exceptions made for smaller developments and to the existing Part 2 text to make it clearer in terms of cases where applicants can demonstrate satisfactory evidence of more up-to-date need. For this reason, text changes are required in Part 1 (which should state 'in these proportions as a general guideline' or similar flexible wording) and the first sentence of Part 2 could be reworded to state 'An alternative approach will only be considered where it can be demonstrated to meet a more up-to-date assessment of parish needs'. It's important to include the word 'parish' here so that changes in the local or national housing need evidence cannot be used as a reason to depart from Section 1.

Part 2 should also remove any reference to character or wider setting, as these are supply-side issues not appropriate for a demand-side policy and are already covered by separate supply-side policies in any case.

The recommended changes to policy wording set out above would have the added benefit of making the policy far more effective in terms of being easier to apply and understand.

KS/H8 Design

The policy is on track to meet the Basic Conditions.

The principle of underpinning this policy with parish-specific Design Guidance is supported. However, the Design Guidance states in its introduction that it is a Supplementary Planning Document (SPD) but this is not correct and should be deleted. Additionally, the Design Guide may not be applicable to all types of development. The current wording of this policy ('Proposals for new developments should....') is too broad and does not allow for exceptions for very minor development. It would be easy to remedy this simply by adding the text 'where appropriate' or similar.

AECOM notes that there is no mention in the supporting text, the policy, or indeed in the Design Guidance itself, of the King's Somborne Conservation Policy (effectively, the Conservation Area Appraisal) that applies to the Conservation Area. This is a significant gap because without it, the Design Guidance, though useful, is quite generic, i.e. it could be applied to most places with a rural village character. Addressing this gap would help address Historic England's concerns with this policy. KSPC should also lobby TVBC for a timely update to the Conservation Policy, drafted in 1987 but still being used.

It is not clear how the Design Guidance's requirements were developed. The process of how it was informed by consultation needs to be clearly stated because it is quite prescriptive (with long lists of do's and don'ts) and currently it is not at all clear who decided what those rules should be or where they came from.

The policy requires applications to meet the 'guidelines' within the Design Guidance, but the document does not contain a section or heading called 'guidelines'. It would therefore be better reworded to state that 'applications will be tested against the Checklists in the Design Guidance'. Once the policy text has been changed to state that applications will be tested against the Checklists, the policy can be made significantly shorter and hence more powerful and effective, because all of 3 a) to j) could be deleted. Currently, including 3 a) to j) in the policy is confusing because this results in two different types/levels of Design Guidance requirements- those not cited in the policy and those that are.

If the recommendations of this EBPD, and appropriate feedback from Regulation 14 consultees, were applied to the Design Guide, it is considered that sufficient design evidence would exist to underpin this policy.

Part 2 a) of the policy overlaps with RLP Policy E1: High Quality Development in the Borough and thus can be deleted. Parts 3 a) and c) overlap with RLP Policy LHW4: Amenity and thus can be deleted. Any policy text on parking should at least reference RLP policy T2: Parking Standards and associated Annex G.

It is recommended that the supporting text paragraph on removal of permitted development rights, which is not (and should not be) carried through to the policy in any case, is deleted.

KS3A Land off Froghole Lane

The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the northern part of the site outside of Flood Zones 2 and 3 is potentially suitable for development and therefore allocation; however, this is subject to further investigation into the feasibility of access and mitigation of the identified constraints.

An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This aligns with the draft policy's aim to allocate fifteen homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy.

Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed, with relevant modifications and subject to the further investigations recommended by the Site Assessment report, into the next iteration of the neighbourhood plan.

KS5A Land at Spencer's Farm (South)

The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the site is potentially appropriate for allocation subject to the mitigation of identified constraints and confirmation of access.

An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This aligns with the draft policy's aim to allocate at least fourteen homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance, could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy.

Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed, with relevant modifications and subject to the mitigation of identified constraints and confirmation of access recommended by the Site Assessment report, into the next iteration of the neighbourhood plan.

KS6A Land adjacent to Cruck Cottage, Winchester Road

The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the site is potentially appropriate for allocation subject to the mitigation of the identified constraints; however, only a limited number of homes could be accommodated because of these constraints.

An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 3-6 homes. This aligns with the draft policy's aim to allocate four homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.

The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed into the next iteration of the neighbourhood plan, with relevant modifications and subject to the mitigation of the identified constraints, bearing in mind that only a limited number of homes could be accommodated because of these constraints.

The phrase 'urban paraphernalia' in the policy should be defined more clearly as it is not a recognised term in the planning system.

KS7A Land at Winchester Road and New Lane (South)

The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the northern part of the site is potentially partly suitable for allocation for limited development subject to avoiding areas of flood risk and creating a feasible access.

An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This is an increased capacity compared with the draft policy's aim to allocate seven homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.

The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed into the next iteration of the neighbourhood plan, with relevant modifications, and subject to the northern part of the site only being considered suitable for allocation for limited development that avoids areas of flood risk and entails a feasible access being created.

1. Introduction

1.1 About this document

1. The 2011 Localism Act introduced neighbourhood planning, allowing parishes or Parish Councils across England to develop and adopt legally binding development plans for their neighbourhood area.
2. King's Somborne Parish Council (henceforth KSPC) is developing a neighbourhood plan for the parish, which lies in Test Valley Borough in Hampshire.
3. As part of the development of the Neighbourhood Plan and its evidence base, KSPC applied successfully to Locality for support from AECOM as part of its Supporting Communities in Neighbourhood Planning project.
4. This document comprises an Evidence Base and Policy Development (EBPD) study provided by AECOM to KSPC.
5. The aim of the EBPD is to review the existing evidence base and policies, identify any gaps within them, and then present policy options and recommendations based not only on the existing evidence base and policies but also on any additional relevant information that applies.
6. The EBPD reviews and comments on emerging policies, in particular in terms of any amendments that may be required to ensure that the policies meet the Basic Conditions of neighbourhood planning.²
7. The review of existing policies will be comprehensive, in that it will assess not only the policy text itself but also the evidence upon which that policy is based. It seeks to verify that:
 - Evidence has been assembled from robust sources;
 - Stakeholder-derived evidence has been considered in an inclusive way;
 - Relevant third-party comments/issues have been addressed;
 - Reasonable conclusions have been drawn from that evidence;
 - All useful evidence available has been referenced;
 - There are no evidence gaps that need to be filled;
 - The draft policy is clearly written, distinct from and in general conformity with the strategic policies in the development plan, which for neighbourhood plans in Test Valley comprises the Revised Local Plan adopted in 2016; and
 - The policy meets the Basic Conditions.

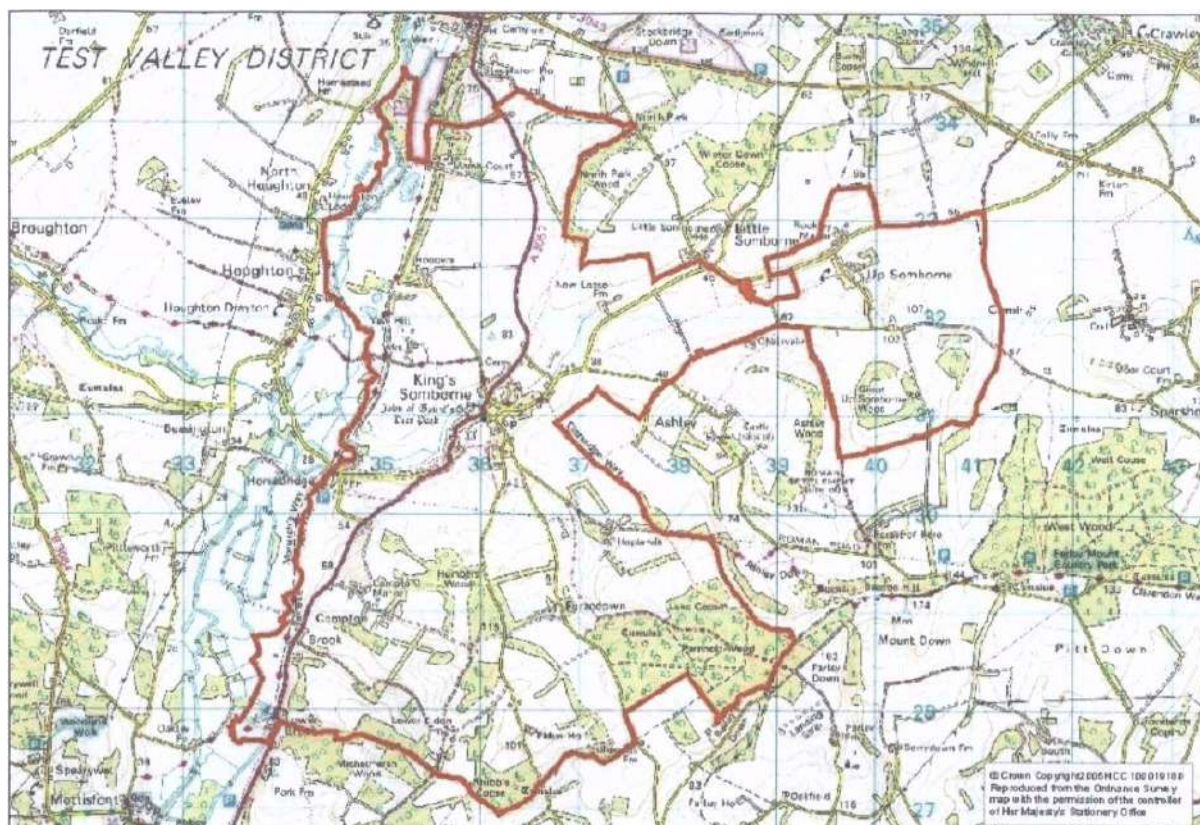
² Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

8. If the AECOM review finds that the draft policy or the evidence on which it is based has any potential for strengthening or improvement, recommendations in this regard will be clearly set out.

1.2 Local context

9. Figure 1 below illustrates the Neighbourhood Plan area. It covers the whole of King's Somborne parish.

Figure 1: King's Somborne Neighbourhood Plan Area³



Source: Test Valley Borough Council

1.3 Planning Policy and Evidence Base

10. This sub-section summarises the relevant local planning policy and evidence base. This entails a review of the following documents: Test Valley Revised Local Plan and King's Somborne Conservation Area Appraisal.

1.3.1 Test Valley Revised Local Plan

11. The Test Valley Revised Local Plan⁴ (RLP) was adopted by TVBC on 27 January 2016. The plan sets out the spatial vision across the Borough up to the

³ Available at <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/neighbourhood-planning/king-39-s-somborne-neighbourhood-plan-nhp>

⁴ Available at <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/dpd>

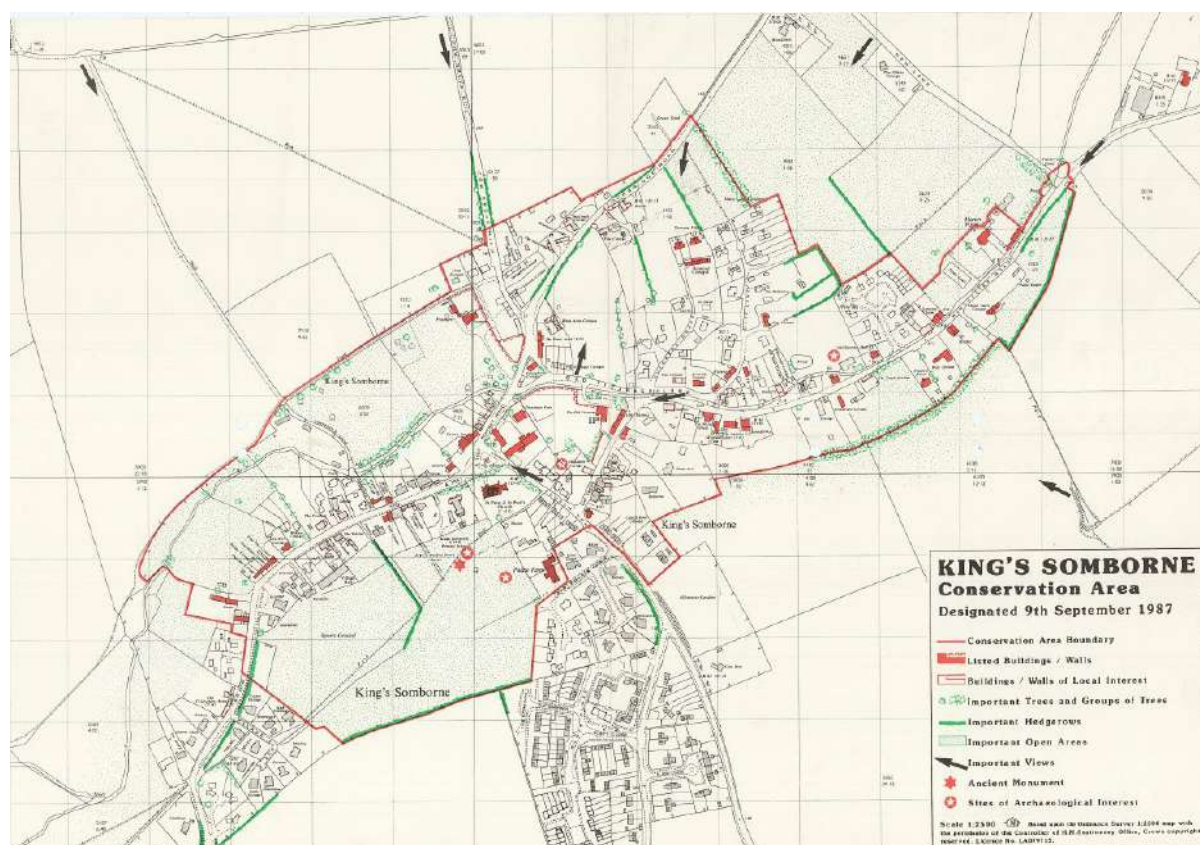
year 2029. Relevant policies within it, as well as any relevant evidence base studies at the local authority level, will be reviewed as appropriate.

1.3.2 King's Somborne Conservation Area Appraisal and Management Plan

12. King's Somborne Conservation Area was originally designated in 1972 and its boundary was reviewed and extended in 1987 to include Stockbridge Road/Old Vicarage Lane/Nutchers Drove/Winchester Road and Romsey Road/Frogghole Lane. TVBC uses a King's Somborne Conservation Policy⁵ that provides a (brief) character appraisal.

⁵ Available at <https://www.testvalley.gov.uk/planning-and-building/heritage/conservationarea#K>

Figure 5: King's Somborne Conservation Area Map



Source: Test Valley Borough Council

1.3.3 Neighbourhood plan activity

Emerging Neighbourhood Plan

13. Since approval of the King's Somborne Neighbourhood Plan area by TVBC, there has been much progress on the neighbourhood plan.
14. Following the submission of a screening opinion for the draft Neighbourhood Plan on 12th March 2018, TVBC determined that the Plan would require a Strategic Environmental Assessment (SEA). This was supported by the response from Natural England. This decision was made on the 23rd May 2018. KSPC subsequently submitted an SA/SEA Scoping Report.⁶
15. The Neighbourhood Plan was also put out to its first round of statutory consultation (known as, and henceforth referred to as, Regulation 14 consultation⁷) in June 2018. Following responses from a range of consultees, which have been provided to AECOM and will be taken into account in our analysis of policy and evidence, the Parish Council decided to make amendments to policies prior to a second Regulation 14 consultation to be held following the completion of this EBPD.

⁶ <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/neighbourhood-planning/king-39-s-somborne-neighbourhood-plan-nhp>

⁷ See <https://www.legislation.gov.uk/uksi/2012/637/regulation/14/made>

16. The progress of the Neighbourhood Plan through the statutory planning process is also set out on the parish website at <https://kingssomborne-pc.gov.uk/ndp/>. The website states that neighbourhood planning activity thus far has involved at least eighteen public meetings/workshops, at least forty-one public meetings of the NDP Steering Group, monthly updates in both the Parish Council Meetings and Parish Magazine (The Gauntlet), as well as leaflet drops. The website also provides the draft plan, appendices and public feedback received at the first Regulation 14 consultation.
17. Since this time, using the 2018 draft NDP as a springboard, significant work has taken place to move the NDP forward, also set out on the parish website.⁸ The website states that this includes work to modify the neighbourhood plan ready for its next consultation, as well as updates and planned updates to the landscape assessment, the housing need and sites appendix, the SA/SEA, the sequential test report, the flood risk study and the Green Space Appendix. Some of these updates are subject to the conclusions not only of this EBPDP report, but also of a separate AECOM Site Assessment report being progressed alongside it.
18. It has been agreed with the Parish Council that this EBPDP report will review fifteen of the sixteen policies in the emerging draft neighbourhood plan, as well as the existing and potential evidence supporting them. The policies to be reviewed are numbered and named as follows:
- KS/E2 Horsebridge to King's Somborne Local Gap
 - KS/E3 Local Green Space
 - KS/H1 Quantity of New Homes Needed
 - KS/H7 Housing Mix
 - KS/E5 Archaeology
 - KS/E7 Biodiversity
 - KS/E8 The Somborne
 - KS/H8 Design
 - KS/F2 Utilities
 - KS/E1 Preserving Landscape Features, Views and Surrounding Farmland
 - KS/E6 Flooding and Water Management
 - KS5A Land at Spencer's Farm (South)
 - KS3A Land off Froghole Lane
 - KS6A Land adjacent to Cruck Cottage, Winchester Road
 - KS7A Land at Winchester Road and New Lane (South)
19. KSPC has suggested, and AECOM agrees, that the last six policies in the list above are best reviewed after the completion of AECOM's site assessment report being progressed in parallel to this EBPDP report. AECOM has further

⁸ See <https://kingssomborne-pc.gov.uk/new-ndp-updates-work-in-progress/>

added to this list policy KS/E3 Local Green Space because the site assessment report (and/or an addendum to it) is reviewing Local Green Spaces. As such, the reviews of these policies and the evidence that supports them will also be informed by the site assessment conclusions.

20. KSPC has also emphasised as a matter of importance that policies KS5A, KS3A, KS6A and KS7A do not represent final site selections. Policies covering these sites were only reviewed in this EBPD because they were included in the most up-to-date draft plan at the time. The sites selected in the final neighbourhood plan may differ from these.

Other relevant evidence documents

21. At project inception, KSPC provided AECOM with a range of other relevant evidence documents relating to the Neighbourhood Plan. These comprise:

- Landscape Assessment (South Downs National Park, 2018);
- King's Somborne Flood Risk Study (Waterco, 2018);
- King's Somborne Neighbourhood Plan Appendix 1.2- Green Space;
- King's Somborne Neighbourhood Plan Appendix 1.0 Revision 1c- Housing Need and Sites;
- Responses from consultees following the 2018 Regulation 14 consultation;
- Sequential Test Report (South Downs National Park)
- Shadow Habitats Regulations Assessment (ECOSA, 2018)
- Sustainability Appraisal (incorporating the Strategic Environmental Assessment) (South Downs National Park, 2019)

22. These evidence base documents have been reviewed as appropriate throughout this report.

2. Assessment methodology

2.1 Assessment of evidence base

23. The evidence base for neighbourhood planning needs to be 'proportionate', i.e. relate well in terms of breadth, depth and scope to the policy being proposed. In line with this approach, the Government's Planning Practice Guidance (PPG)⁹ expects most evidence in neighbourhood planning to be 'secondary' (i.e. already collected by another party, making evidence gathering more of an exercise in assembling, interpreting and showing understanding of existing data).

24. Any evidence used should be clearly referenced and presented in an accessible way to justify policies, both for the purpose of examination and for the benefit of residents reading a plan as well as interested parties such as landowners and developers, some of whom may be impacted.

⁹ <https://www.gov.uk/guidance/neighbourhood-planning--2>

25. Evidence can come from several sources, including:

- the adopted or emerging Local Plan (from a policy conformity perspective¹⁰);
- Local Plan evidence base studies that inform policy documents (e.g. the Strategic Housing Land Availability Assessment or equivalent and Employment Land Review);
- technical primary evidence generated or commissioned by the Parish Council itself (e.g. green infrastructure assessment);
- stakeholder-derived primary evidence generated or commissioned by the Parish Council (e.g. a survey of local households and businesses); and
- relevant national reports, studies and data such as the 2011 Census.

2.2 Assessment of evidence base (see also Appendix 1)

26. AECOM's evidence review focuses on three lines of inquiry:

- **Policy understanding**, which summarises what assessors thinks the policy intent is and follows on from an inception call with the group.
- **Evidence assembly**, which covers basic checks including:
 - Whether evidence has been gathered from verifiable and reputable sources;
 - Whether any third party comments have been taken into account (e.g. from developers, landowners, statutory bodies): and
 - Whether there are any gaps and obvious sources not referred to (e.g. Local Plan background studies).
- **Evidence analysis**, which considers whether the evidence referred to has been appropriately understood, analysed and reasonable conclusions reached in drawing up policy. A distinction is made between stakeholder-derived (e.g. from local household or business surveys) and technical evidence in terms of how well the evidence was analysed, although both are treated as equally important. This stage of the review also considers:
 - Whether evidence is, on balance, proportionate; and
 - Whether the evidence has already had a degree of external scrutiny (e.g. from the Local Planning Authority, LPA) in which case such comments are considered.

¹⁰ In applying basic condition 'e,' 'general conformity' relates to the adopted, not emerging Local Plan (see PPG, Paragraph: 065 Reference ID: 41-065-20140306). However, the evidence behind any emerging Local Plan is part of the evidence base for the NDP and it is important the NDP takes account of policy development within it given that, once adopted the new Local Plan polices will supersede those in the NDP.

2.3 Policy review (see also Appendix 1)

27. After examining the evidence that underpins each policy, the review considers the following questions in terms of meeting the Basic Conditions¹¹ of a neighbourhood plan:

- Is the policy spatial in nature and therefore within the scope of a development plan or is it supporting a community project?
- Can the policy be reasonably implemented by planning officers (within planning legislation) when deliberating on planning applications?
- Does the policy have due regard to national policy and guidance?
- Does the policy comply with human rights law?
- Is the policy in general conformity with adopted strategic local plan policy? Does it add value to that policy, rather than reiterate policy principles?
- Is the policy clearly written and easy to understand?

2.4 Policy wording

28. The Government's Planning Practice Guidance¹² states:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise, and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."

29. Precise wording of policies is, broadly speaking, considered a matter more for the neighbourhood group itself than for AECOM, based not only on the conclusions and recommendations of this report, but also taking into account feedback from other relevant stakeholders, including the LPA.

30. Nevertheless, in cases where minor changes to policy wording may have the effect of increasing soundness and robustness, we have set out any changes we recommend (which, as with all our conclusions and recommendations, comprise non-binding advice).

31. Where we consider significant re-drafting of policy wording is required, we have signposted useful toolkits and Examiners' comments. See Appendix 4.

32. We have undertaken a review of the evidence available to support the draft policies emerging in the documentation sent to AECOM by the Parish Council. From this, we have identified any gaps within the evidence base gathered to

¹¹ For further information on the basic conditions, please see 'How to write a basic conditions statement available' here: <https://mycommunity.org.uk/wp-content/uploads/2016/08/How-to-write-a-basic-conditions-statement.pdf>

¹² Paragraph: 041 Reference ID: 41-041-20140306, available online at <https://www.gov.uk/guidance/neighbourhood-planning--2>

date by the Forum and also provided comment on future work or actions needed to ensure a robust policy approach.

2.5 About Appendix 1

33. Appendix 1 is our detailed review of each policy using the methodology described above which considers the draft policies alongside the policies of the adopted Local Plan and the National Planning Policy Framework (NPPF)¹³, and evidence at both parish and Test Valley level. It aims to provide an answer to the questions raised above. Recommendations are provided in terms of actions the Parish Council should take in terms of further evidence gathering and/or policy development.

34. The column headings in the Appendix 1 table can be explained as follows:

- **Policy name, number and theme:** The policy name and number as it appears in the Draft Plan. Wherever possible, policies are grouped into themes;
- **Policy intent:** This column summarises AECOM's understanding of the policy intent;
- **Evidence source and type:** This column identifies and checks the source of evidence and whether it is technical evidence or based on local surveys and engagement;
- **Evidence analysis:** This column analyses whether the evidence has been appropriately analysed and reasonable conclusions drawn;
- **Proportionality and gaps:** This column indicates, in AECOM's view, whether the evidence is proportionate and where further potentially useful evidence in support of the policy, theme or objective could be found and referenced;
- **Effectiveness of the policy:** This column analyses whether the evidence is clearly written, easy to understand and implementable;
- **Conformity:** This column provides AECOM's assessment of the extent to which the policy conforms with the relevant policies or provisions of the Test Valley Local Plan, the NPPF and/or the local plan and parish evidence base as well as with human rights and European law; and
- **Conclusion and recommendations:** This column summarises our thoughts on the policy and outlines our overall recommendations for any necessary changes to policy or evidence, including whether specific issues need to be discussed with third parties to develop the policy further (e.g. TVBC). If we consider that a policy should be deleted entirely, for example because it duplicates Local Plan policy, we state this here.

¹³ Available online at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

2.6 About Appendix 2

35. As advised by KSPC, one of the most important functions of this EBPD report is to provide a third-party, independent assessment of the Landscape Assessment already produced by South Downs National Park Authority and which informed both landscape policy and site allocations in the emerging neighbourhood plan.
36. Landscape specialists at AECOM carried out a Technical Review of the approach, methodology and conclusions of the South Downs Landscape Assessment, both through desktop work and a site visit. The AECOM Technical Review also informed the approach to landscape taken in AECOM's separate Site Assessment report for King's Somborne that was progressed at the same time as this study; its landscape conclusions are consistent with the Technical Review because both pieces of work were progressed by the same team.
37. Appendix 2 of this report sets out the full Technical Review, noting that key conclusions and recommendations from it, as well as possible next steps, have already been set out in the review of the relevant policy (KS/E1) in Appendix 1.
38. It is important to note that the Technical Review, this rest of this report and the AECOM Site Assessment report do not comprise fully-fledged Landscape Assessments in their own right, although all consider landscape issues carefully and robustly. As such, if KSPC consider, following completion of both AECOM packages, that a replacement landscape study may be needed to support the neighbourhood plan, this would have to be commissioned separately, but it is recommended that any replacement study have appropriate regard to the conclusions and recommendations of all AECOM studies.
39. However, the Parish Council may equally choose not to commission a replacement landscape report; if this is the case then relevant landscape conclusions in the AECOM studies will have to be used instead, with the above caveat that none of them are landscape assessments in their own right. It is recommended that the Parish Council seek advice from TVBC on this issue.

2.7 About Appendix 3

40. Appendix 3 lists policies in 'made' (i.e. adopted) neighbourhood plans from across England that are relevant to some of the policies that have been assessed at King's Somborne. The value of assessing a 'made' plan policy is that it has passed Examination and thus must be in full conformity with the basic conditions of neighbourhood planning.
41. In most cases, the examples of policies from 'made' plans have been taken from those where AECOM advised the group, but in cases where a relevant policy can only be found in a 'made' plan that AECOM had no involvement in, the policy has been quoted nonetheless.
42. If any of the policy examples in Appendix 3 are considered of particular interest or relevance, then it may be helpful to review the relevant neighbourhood plan Examiner's Report, which should in every case be available online (if it is not, contact the relevant Local Authority). The Examiner's Report may show how and why the policy in question was amended to conform with the Basic

Conditions, unless the draft policy was considered to meet the Basic Conditions without amendment.

2.8 About Appendix 4

43. Appendix 4 briefly sets out further information on neighbourhood plan policy drafting, including links to resources that may be helpful in this regard.

3. Conclusions and Recommendations

3.1 General findings

44. In developing planning policies for the emerging Neighbourhood Plan, KSPC should ensure that they do not merely repeat existing national and local planning policies. In a robust neighbourhood plan, neighbourhood policies would either increase the effectiveness and/or specificity of local plan policies (i.e. by adding local criteria and/or taking local context into account) or propose a policy where there was previously a policy void.
45. However, where KSPC supports TVBC's existing policy approach this can simply be referenced in supporting text rather than comprising a policy in its own right. Equally, developing measurable metrics (targets or indicators) to monitor effects of implementation is another way of ensuring the neighbourhood plan can add value over and above local and national policies.
46. All evidence that KSPC relies on in developing its planning policies should be properly documented within the Neighbourhood Plan. The supporting text to each policy must refer to the evidence base used to inform that policy approach, summarising the key points which will help demonstrate how robust the policy is. The supporting text, which should stand alone from and be more clearly differentiated from the policy text itself, should explain why the policy is required and signpost the reader to the plan's evidence base where they can find additional information. Policy justification should also reference higher-level evidence and policy, for example from the Test Valley and South West Hampshire Joint Local Plan and The Test Valley Plan and/or their evidence base documents and policies, as this will help support the policies and provide further justification.
47. In some cases, additional evidence work may be required to enhance the robustness of policies. As a general rule, the more a policy departs from or goes beyond the local plan (e.g. in terms of standards), the more evidence is required. It is recommended that the Parish Council conducts a further check of its draft final policies to ensure they are adding value to the Local Plan and are locally specific to the neighbourhood. Ideally this should be done with the LPA's Neighbourhood Planning Officer.

3.2 Headline summary of policy specific findings (full details in Appendix 1)

KS/E1 Preserving Landscape Features, Views and Surrounding Farmland

48. The policy appears in principle to meet the Basic Conditions but may need some future rewording (probably minor) given the recommendation that the South Downs National Park Landscape Assessment should not be relied on.
49. Specifically, in their Technical Review (see Appendix 2), AECOM landscape specialists agree with KSPC's significant concerns about the Landscape Assessment's approach and methodology. They do not consider its conclusions should be relied upon. This means that the sites allocated on the basis, in part, of the Landscape Assessment should be reassessed, which AECOM is now doing. KSPC can have confidence that AECOM's landscape conclusions in the Site Assessment will be more robust than those in the

Landscape Assessment but should also note that neither the Site Assessment nor this EBPDP report are direct substitutes for a full landscape assessment.

50. Nevertheless, depending on their views on the AECOM Site Assessment, it may be that TVBC consider that the landscape evidence within it is sufficient to make the allocations robust, without the need for a new or repaired standalone Landscape Assessment. On the other hand, if the Council considers that a new Landscape Assessment is still required, then KSPC have some options to consider- either requiring South Downs to rework their existing assessment in light of the AECOM recommendations in this report and the Site Assessment, or to commission a third party to carry one out, also having regard to AECOM's recommendations in this and the Site Assessment report.
51. To determine whether or not a replacement landscape study may be required, AECOM reviewed all 'made' (i.e. adopted) neighbourhood plans that allocate sites across Test Valley and neighbouring (but comparable) Basingstoke and Deane and Winchester council areas. The neighbouring authority areas were reviewed because none of Test Valley's made neighbourhood plans allocate sites. The findings of this exercise was that of the seven made neighbourhood plans across the study area that allocate sites, none of the five in Basingstoke and Deane (Kingsclere, Oakley and Deane, Overton, Sherborne St. John and Whitchurch) commissioned standalone landscape evidence, rather using landscape evidence from the Local Plan evidence base alone.
52. However, both such neighbourhood plans in Winchester (Denmead and Twyford) did commission their own parish-specific landscape assessment. The conclusion here is that neighbourhood plans can be adopted whether or not they have commissioned parish-specific landscape assessment, and whether or not to do so likely depends (in part, at least) on the quality, relevance and/or availability of landscape evidence already available at local plan level.
53. Greater clarity is needed on whether or not the policy has been informed by the Test Valley Community Landscape Project, and if not, why not.
54. The first sentence of section 1 of the policy effectively repeats RLP policy and can thus be deleted. AECOM agrees with the TVBC suggestion that 'to help justify this policy it would be beneficial to highlight/justify key viewpoints or features in the evidence base that support the 40m reference'. It is recommended that photographs from key viewpoints on publicly accessible land, accompanied by explanations and annotations, be included in the evidence base supporting this policy (whether in a replacement Landscape Assessment or otherwise).

KS/E2 Horsebridge to King's Somborne Local Gap

55. This policy is likely to meet the Basic Conditions and is in conformity with local and national policy.
56. It is recommended that the SINC boundaries be added to the Figure 2 map, references to the more distant Figure 3 be removed, and additions made to the supporting text to explain how the SINC boundaries inform the Local Gap boundary.

57. Reference to the NPPF (specifically, paragraph 127 c) and d)) should be added to the supporting text. Although the NPPF does not specifically refer to the need to avoid coalescence, it does require planning policies to be sympathetic to local character and history, which here could be interpreted as the character and history of King's Somborne and Horsebridge as two separate settlements.

KS/E3 Local Green Space

58. The policy is on track to meet the Basic Conditions. However, it is subject to the results of AECOM's separate assessment of Local Green Spaces.
59. Note also that its key evidence document, Appendix 1.2, uses incorrect terminology throughout and does not reference national policy. The correct term to use is 'local green space', not 'green space' or 'local area of green space'. This may seem like a minor point, but it is crucial to demonstrate that the Plan evidence base has been prepared with appropriate reference to national and local policy. In the same way, the Appendix needs to reference the NPPF.
60. It is difficult to cross-reference the sites in the table in the Assessment of Suitability section with the maps in Section 5. A final column should be added to the Section 4 table with the map reference from Section 5. It is not clear what the inset at the top left of the map on page 14 is showing.
61. In their Reg. 14 response, Historic England asked if it would be possible for this policy to be more specific about the historic significance of the local green spaces, and this remains a gap because it does not yet appear. This should, however, be referenced in the Appendix and/or the supporting text rather than in the policy itself.
62. If new sites are to be added or any to be deleted based on the conclusions of the AECOM assessment of Local Green Spaces, it is advisable to update the evidence base first before writing them into the policy; one solution could be to mention them in comments boxes rather than in the policy text itself.

KS/E5 Archaeology

63. The evidence referenced in the supporting text to the policy is appropriate, proportionate and rich in detail.
64. Part 2 needs to be aligned with national policy (NPPF paragraph 184), rather than seeking to preserve all potentially significant archaeological deposits in situ where possible.
65. In Part 3, the text should be reworded to state 'recording of archaeological remains that would be lost as part of development will not be regarded as offsetting their loss'. This would be much clearer for a development management officer to interpret and hence make the policy significantly more effective, as well as bringing it into line with local policy.
66. Part 1 of the policy is in conformity with local and national policy. With minor rewording, Parts 2 and 3 can be made in conformity as noted above.

KS/E6 Flooding and Water Management

67. The policy, in broad terms, appears to meet the Basic Conditions. The Flood Risk Study appears to be a robust, helpful source of evidence for it.
68. However, it is not clear why the policy text (engineering bricks to a height of 800mm above surrounding ground levels) departs from the Flood Risk Study's own recommendation (600mm above surrounding ground levels). If this is a typo, it should be corrected. If it is intentional, it needs justification.
69. The Sequential Test Report, unlike the Flood Risk Study, is really only applicable to the proposed specific site allocations, which are not covered by this policy. As such, reference to it can be removed from the supporting text.
70. TVBC comments at Reg. 14 supported the principle of providing locally specific information about parish watercourses.
71. KS/E6 currently sets out only some but not all of the recommendations of the Flood Risk Study. Although it is understood that this may be because the Flood Risk Study was commissioned only to assess specific allocated sites and not development in general, its more generic recommendations for flood mitigation would be equally valid for similar developments that may come forward on non-allocated sites.
72. The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of the river bank, and the design of any development within this area needs to be in line with their guidance.
73. Policy effectiveness would be improved if further parts could be added to it that set out these detailed recommendations (reworded slightly for proportionality and to apply only to developments requiring planning permission that deliver one or more net new dwellings, or comprise commercial development), including:
- the recommendation that developable areas be limited to Flood Zone 1;
 - the requirement, where appropriate and proportionate, for detailed hydraulic modelling of Somborne Stream, or where this has already taken place, that it informs the development approach to flood mitigation;
 - the requirement for groundwater monitoring to be undertaken as part of any ground investigation works, and that these works should inform foundation design and design of the drainage system;
 - any Flood Risk Assessment, where required by TVBC and/or the EA, to be based on the findings of hydraulic modelling, and include a Drainage Strategy;
 - the requirement for surface water discharge to be to Somborne Stream and restricted to greenfield runoff rates;
 - the requirement, where appropriate, for attenuation storage systems designed to accommodate runoff during all storm events up to and including the 1 in 100 year plus 40% climate change event.
 - the requirement, where appropriate, for below ground attenuation tanks or modular storage to be designed as sealed systems, to facilitate gravity

drainage, and to prevent uplift (floatation) of the tanks when the groundwater table is high and to prevent ingress of groundwater; and

-the use of further flood mitigation measures should be considered where appropriate, including box planters, rainwater harvesting and water butts

KS/E7 Biodiversity

74. The policy is on track to meet the Basic Conditions but needs some minor amendments before submission.
75. The key conclusion of the Shadow HRA has been carried through clearly and effectively into the policy.
76. The policy wording is confusing. This can easily be solved by replacing 'support or are in close proximity to' with 'where development would impact on'. The second paragraph (covering impacts on Mottisfont Bats SAC) can be deleted as it is already required by the RLP (see paragraphs 7.34 and 7.35, which themselves restate national policy in any case).
77. There is no mention of considering the BAP Priority Habitat in either the supporting text or the policy itself, and the policy does not mention the potential for contributions from new development to enhance its value. AECOM understands from the Parish Council that reference to the BAP was omitted from the policy itself so as not to duplicate/overlap with Policy E5 in the Test Valley Replacement Local Plan (which is good practice), but to make this clear for the avoidance of doubt, policy E5 should be referenced in the supporting text if not in the policy itself.
78. The policy might be more effective if point 3 'development that contributes to the network of habitats identified in the Biodiversity Opportunity Area will be supported' were moved to be point 1 as it feels more like the main thrust/headline for the policy rather than lower down in the list.
79. Subject to the changes recommended above, the remainder of the policy is in general conformity with RLP Policies E5: Biodiversity and E6: Green Infrastructure.

KS/E8 The Somborne

80. The policy appears to meet the Basic Conditions.
81. The supporting text for the policy, in particular 3.31 and 3.32, is clear and strong. However, it needs to clearly reference data sources and provide relevant context, as well as quote relevant national policy.
82. Point d) of Part 1 of the policy can be deleted because it repeats RLP Policy E7: Water Management.
83. The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of any river bank, and the design of any development within this area needs to be in line with their guidance.

84. The policy is currently sitting in the Biodiversity section of the neighbourhood plan. It is understood why this is the case, but it may be more logical to move it to the Flooding and Water Management section just above.
85. Supported by the NPPF wording, the policy could be made more effective by adding the word 'character' to a). Furthermore, the policy would be made even more effective if Section 2 were deleted and simply merged into the text of 1 above the lettered points, thus: 'Development proposals that would adversely affect the following features of the Somborne, Park Stream, River Test and the River Test SSSI will not be supported.'
86. For similar reasons, the policy would be more effective if renamed 'The River Network' or similar rather than just 'The Somborne'.

KS/F2 Utilities

87. The policy is on track to meet the Basic Conditions.
88. The reference to national and local policy in the supporting text is helpful. As no specific comments were made at Reg.14 by relevant infrastructure providers, there is likely no need to reference any other sources.
89. The policy is more proportionate, effective and in conformity with national and local policy now that relevant TVBC comments at the Reg. 14 stage have been addressed.
90. The phrasing in part one of the policy is slightly unusual and the policy would be more effective if it were reworded- namely, rather than 'perpetuate the impact on', 'adversely impact' would be clearer. In addition, there is no technical evidence supporting the plan that reliability is affected by whether services are routed underground or not.
91. In comments on the draft report, the Parish Council again stated that underground cables are more reliable than overground. AECOM does not dispute this but, again, technical evidence needs to be cited to support this statement if it is to appear in the neighbourhood plan.

KS/H1 Quantity of New Homes Needed

92. The policy is on track to meet the Basic Conditions.
93. The Housing Need and Sites report appears robust in terms of quantity. AECOM checked with TVBC that the Council supports/remains comfortable with the quantity of new homes needed and the answer is that they are. As such, the quantity of homes needed is considered appropriate, because in practice in the neighbourhood planning system, Examiners tend to rely strongly on evidence of agreement between the LPA and the neighbourhood planners on quantity of homes needed, as long as that quantity is based on some evidence of need that the Council consider is robust, which in this case it is.
94. Rearrangement of supporting text and Plan sections is needed to better separate demand-side evidence (i.e. how many homes are needed in future) from supply-side evidence (i.e. the quantity and location of the land needed to accommodate those homes), as advised by national planning guidance.

95. On this basis, it is strongly recommended that the section heading for KS/H1 be renamed from 'quantity and location of new homes' to 'quantity and size of new homes' so that this section remains demand-side only. Likewise, all supply-side references should be removed from the supporting text here and instead added to the supporting text of the site allocations policies. At the same time, because housing mix is more of a demand-side than a supply-side issue, it is recommended that the whole of the housing mix section and Policy KS/H7 is moved into this section (after KS/H1 and its supporting text) before the Plan reader gets to the Site Allocations section following.
96. As worded, the policy is effective but requires amendments to be made to policy KS/H7 for consistency (which is further justification for the two policies being in the same section)
97. The mix of affordable houses required is a housing tenure issue rather than a housing type issue. Thus, the policy would be more effective if section 2 were reworded to state 'The type, size and tenure of homes....'
98. While supporting text in the neighbourhood plan mentions relevant RLP policies, the policy itself should state that the mix of affordable homes should have regard to RLP policy COM7: Affordable Housing alongside any parish-specific evidence. Having regard to COM7 for housing allocations in neighbourhood plans is itself a requirement of RLP policy COM9: Community Led Development, so the latter policy could also be referenced.

KS/H7 Housing Mix

99. The policy needs minor amendment in order to meet the Basic Conditions.
100. The evidence of demand for detached homes, bungalows, starter homes and retirement housing set out in the supporting text has not been carried through into the policy itself, which as worded covers housing size only and not housing type. This could easily be remedied by rewording the final sentence of Part 2 as follows: 'The presumption will always be in favour of smaller homes, including detached smaller homes such as bungalows, and any other types of smaller dwelling with gardens suitable as starter homes or for retirement living'.
101. A public comment on the Reg. 14 consultation called for the Neighbourhood Plan to support self and custom-building. This policy would be the place to do so but currently there is no mention of this issue. While there is no requirement for the policy to support this objective, this would align with national policy and if there is a specific reason not to do so, it should be stated in the supporting text.
102. The percentage mix in the policy as worded is overly prescriptive as local needs are likely to fluctuate over the plan period. There should be exceptions made for smaller developments and to the existing Part 2 text to make it clearer in terms of cases where applicants can demonstrate satisfactory evidence of more up-to-date need. For this reason, text changes are required in Part 1 (which should state 'in these proportions as a general guideline' or similar flexible wording) and the first sentence of Part 2 could be reworded to state 'An alternative approach will only be considered where it can be demonstrated to meet a more up-to-date assessment of parish needs'. It's important to include

the word 'parish' here so that changes in the local or national housing need evidence cannot be used as a reason to depart from Section 1.

103. Part 2 should also remove any reference to character or wider setting, as these are supply-side issues not appropriate for a demand-side policy and are already covered by separate supply-side policies in any case.
104. The recommended changes to policy wording set out above would have the added benefit of making the policy far more effective in terms of being easier to apply and understand.

KS/H8 Design

105. The policy is on track to meet the Basic Conditions.
106. The principle of underpinning this policy with parish-specific Design Guidance is supported. However, the Design Guidance states in its introduction that it is a Supplementary Planning Document (SPD) but this is not correct and should be deleted. Additionally, the Design Guide may not be applicable to all types of development. The current wording of this policy ('Proposals for new developments should....') is too broad and does not allow for exceptions for very minor development. It would be easy to remedy this simply by adding the text 'where appropriate' or similar.
107. AECOM notes that there is no mention in the supporting text, the policy, or indeed in the Design Guidance itself, of the King's Somborne Conservation Policy (effectively, the Conservation Area Appraisal) that applies to the Conservation Area. This is a significant gap because without it, the Design Guidance, though useful, is quite generic, i.e. it could be applied to most places with a rural village character. Addressing this gap would help address Historic England's concerns with this policy. KSPC should also lobby TVBC for a timely update to the Conservation Policy, drafted in 1987 but still being used.
108. It is not clear how the Design Guidance's requirements were developed. The process of how it was informed by consultation needs to be clearly stated because it is quite prescriptive (with long lists of do's and don'ts) and currently it is not at all clear who decided what those rules should be or where they came from.
109. The policy requires applications to meet the 'guidelines' within the Design Guidance, but the document does not contain a section or heading called 'guidelines'. It would therefore be better reworded to state that 'applications will be tested against the Checklists in the Design Guidance'. Once the policy text has been changed to state that applications will be tested against the Checklists, the policy can be made significantly shorter and hence more powerful and effective, because all of 3 a) to j) could be deleted. Currently, including 3 a) to j) in the policy is confusing because this results in two different types/levels of Design Guidance requirements- those not cited in the policy and those that are.
110. If the recommendations of this EBPD, and appropriate feedback from Regulation 14 consultees, were applied to the Design Guide, it is considered that sufficient design evidence would exist to underpin this policy.

111. Part 2 a) of the policy overlaps with RLP Policy E1: High Quality Development in the Borough and thus can be deleted. Parts 3 a) and c) overlap with RLP Policy LHW4: Amenity and thus can be deleted. Any policy text on parking should at least reference RLP policy T2: Parking Standards and associated Annex G.
112. It is recommended that the supporting text paragraph on removal of permitted development rights, which is not (and should not be) carried through to the policy in any case, is deleted.

KS3A Land off Froghole Lane

113. The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the northern part of the site outside of Flood Zones 2 and 3 is potentially suitable for development and therefore allocation; however, this is subject to further investigation into the feasibility of access and mitigation of the identified constraints.
114. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This aligns with the draft policy's aim to allocate fifteen homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy.
115. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed, with relevant modifications and subject to the further investigations recommended by the Site Assessment report, into the next iteration of the neighbourhood plan.

KS5A Land at Spencer's Farm (South)

116. The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the site is potentially appropriate for allocation subject to the mitigation of identified constraints and confirmation of access.
117. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This aligns with the draft policy's aim to allocate at least fourteen homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance, could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy.
118. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered

that this policy could be progressed, with relevant modifications and subject to the mitigation of identified constraints and confirmation of access recommended by the Site Assessment report, into the next iteration of the neighbourhood plan.

KS6A Land adjacent to Cruck Cottage, Winchester Road

119. The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the site is potentially appropriate for allocation subject to the mitigation of the identified constraints; however, only a limited number of homes could be accommodated because of these constraints.
120. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 3-6 homes. This aligns with the draft policy's aim to allocate four homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.
121. The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed into the next iteration of the neighbourhood plan, with relevant modifications and subject to the mitigation of the identified constraints, bearing in mind that only a limited number of homes could be accommodated because of these constraints.
122. The phrase 'urban paraphernalia' in the policy should be defined more clearly as it is not a recognised term in the planning system.

KS7A Land at Winchester Road and New Lane (South)

123. The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the northern part of the site is potentially partly suitable for allocation for limited development subject to avoiding areas of flood risk and creating a feasible access.
124. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This is an increased capacity compared with the draft policy's aim to allocate seven homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.
125. The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed into the next iteration of the neighbourhood plan,

with relevant modifications, and subject to the northern part of the site only being considered suitable for allocation for limited development that avoids areas of flood risk and entails a feasible access being created.

3.3 Recommendations for next steps

126. This neighbourhood plan evidence base and policy review has aimed to provide KSPC with recommendations on policy and evidence for King's Somborne Neighbourhood Plan. We recommend that the Parish Council should, as a next step, implement the recommended changes to finalise draft policies, at which point it can be resubmitted to TVBC for informal/unofficial comment in advance of formal submission.

Appendix 1: Detailed policy and evidence review¹⁴

¹⁴ Note: For clarity, policies are reviewed in alphabetical order of policy identifier/number, which is not necessarily the same order in which they appear in the plan.

Policy name and number	KS/E1 Preserving Landscape Features, Views and Surrounding Farmland
Summary of policy intent	<p>Development will be permitted where it is demonstrated that it conserves and enhances landscape character typified by open chalk downland on the hills and a more enclosed valley floor. For major applications and those likely to have the potential for a significant impact, this should take the form of a Landscape Appraisal prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute & IEMA) or its successors.</p> <p>Development that increases the prominence of the village of King's Somborne up the valley sides, above the 40m contour, will not be permitted unless it is demonstrated that the impact is mitigated by the existing landform or screening by existing building or trees.</p>
Evidence source and type	<p>Landscape Assessment (South Downs National Park Authority, 2018)</p> <p>Test Valley Landscape Project (TVBC)¹⁵</p>
Evidence analysis	<p>A key driver for this EBPD report was that KSPC were dissatisfied with the methodology of the South Downs-produced Landscape Assessment. As such, KSPC and AECOM agreed for it to be subjected to a detailed appraisal by AECOM landscape specialists. That appraisal comprises Appendix 2 of this report and is summarised here as follows:</p> <ul style="list-style-type: none"> — The Landscape Assessment should make reference to the Landscape Institute Technical Information Note 'Townscape Character Assessment' (TIN 05/2017) and Natural England's 2019 guidance when considering landscape / townscape character (and interactions between each); — The Landscape Assessment methodology should clarify how HLCA has been used, and provide explanation of why Historic Continuity appears to be given greater weight in the judgement of Landscape Distinctiveness than other aspects of character; — Landscape sensitivity should be considered in relation to the type of development proposed;

¹⁵ At <https://www.testvalley.gov.uk/planning-and-building/treesandlandscape/test-valley-community-landscape-project/volume-1-description-and-classification-of-landscape-character-types-and-area/introduction>

	<ul style="list-style-type: none"> — Greater clarity and further evidence should be provided to support the judgements of landform, land cover and visibility; — The scoring of matrices should be reviewed for consistency, and to ensure they align with the criteria descriptions; — Consideration of the settlement pattern should form part of the judgement on landscape character sensitivity to avoid 'double counting'; — The Landscape Assessment does not in the opinion of AECOM adequately explore the potential for mitigation measures for each site which may affect its capacity to accommodate development. For example, guidance on where development should be located within a given site, or what landscape elements / features present are characteristic / valued and should (where feasible) be retained; — The Landscape Assessment would benefit from a site-based spatial analysis of the findings, in the form of plans, ZTVs and photographs, to describe the character baseline, analysis of value and sensitivity, and any other factors that might inform the design process for development of the type proposed. <p>Recommendations based on the conclusions above are set out below.</p> <p>The Test Valley Landscape Project is referenced in the supporting text but there is no indication of whether or not it has informed the policy. If it has not, then it should do (even allowing for the fact that it is now quite old), particularly given the acknowledged shortcomings of the South Downs work.</p>
<p>Proportionality and gaps</p>	<p>The first sentence of section 1 of the policy effectively repeats RLP Policy E2: Preserve, Conserve and Enhance the Landscape Character of the Borough, and can thus be deleted. The TVBC comments at Reg. 14 (and TVBC comments in the plan itself) support the principle of the forty-metre contour as a cut-off point for how applications are determined in landscape terms, and the suggestion that specificity is added to ensure no adverse impact from future development seems to have been acknowledged. However, this version of the Plan does not appear to have responded to the TVBC suggestion that 'to help justify this policy it would be beneficial to highlight/justify key viewpoints or features in the evidence base that support the 40m reference', and so this continues to be a gap. It is recommended that photographs from key viewpoints, accompanied by explanations and annotations, be included in the evidence base supporting this policy. They could, for example, be added as a landscape annex to the Design Guidelines. The key viewpoints, which would all need to be on publicly-accessible land, could comprise or include those referred to as 'important views' in the Conservation Area map.</p>

Effectiveness of policy	The policy as currently worded appears to have responded appropriately to TVBC's Reg. 14 comments, which will improve its performance at the next round of consultation.
Conformity check	Subject to the deletion recommended above, the remainder of the policy is in conformity with the Local Plan and national policy.
Conclusion and recommendations	<p>The policy appears in principle to meet the Basic Conditions but may need some future rewording (probably minor) given the recommendation that the South Downs National Park Landscape Assessment should not be relied on.</p> <p>Specifically, in their Technical Review (see Appendix 2), AECOM landscape specialists agree with KSPC's significant concerns about the Landscape Assessment's approach and methodology. They do not consider its conclusions should be relied upon. This means that the sites allocated on the basis, in part, of the Landscape Assessment should be reassessed, which AECOM is now doing. KSPC can have confidence that AECOM's landscape conclusions in the Site Assessment will be more robust than those in the Landscape Assessment but should also note that neither the Site Assessment nor this EBPD report are direct substitutes for a full landscape assessment.</p> <p>Nevertheless, depending on their views on the AECOM Site Assessment, it may be that TVBC consider that the landscape evidence within it is sufficient to make the allocations robust, without the need for a new or repaired standalone Landscape Assessment. On the other hand, if the Council considers that a new Landscape Assessment is still required, then KSPC have some options to consider- either requiring South Downs to rework their existing assessment in light of the AECOM recommendations in this report and the Site Assessment, or to commission a third party to carry one out, also having regard to AECOM's recommendations in this and the Site Assessment report.</p> <p>To determine whether or not a replacement landscape study may be required, AECOM reviewed all 'made' (i.e. adopted) neighbourhood plans that allocate sites across Test Valley and neighbouring (but comparable) Basingstoke and Deane and Winchester council areas. The neighbouring authority areas were reviewed because none of Test Valley's made neighbourhood plans allocate sites. The findings of this exercise was that of the seven made neighbourhood plans across the study area that allocate sites, none of the five in Basingstoke and Deane (Kingsclere, Oakley and Deane, Overton, Sherborne St. John and Whitchurch) commissioned standalone landscape evidence, rather using landscape evidence from the Local Plan evidence base alone. However, both such neighbourhood plans in Winchester (Denmead and Twyford) did commission their own parish-specific landscape assessment. The conclusion here is that neighbourhood plans can be adopted whether or not they</p>

have commissioned parish-specific landscape assessment, and whether or not to do so likely depends (in part, at least) on the quality, relevance and/or availability of landscape evidence already available at local plan level.

Greater clarity is needed on whether or not the policy has been informed by the Test Valley Community Landscape Project, and if not, why not.

The first sentence of section 1 of the policy effectively repeats RLP policy and can thus be deleted. AECOM agrees with the TVBC suggestion that 'to help justify this policy it would be beneficial to highlight/justify key viewpoints or features in the evidence base that support the 40m reference'. It is recommended that photographs from key viewpoints on publicly accessible land, accompanied by explanations and annotations, be included in the evidence base supporting this policy (whether in a replacement Landscape Assessment or otherwise).

Policy name and number	KS/E2 Horsebridge to King's Somborne Local Gap
Summary of policy intent	To preserve the separate identities of King's Somborne and Horsebridge the land between is identified as a local gap. Development within this area will only be permitted where it does not lead to the physical or visual coalescence of the community, either individually or cumulatively or where it meets essential needs that cannot be met elsewhere.
Evidence source and type	None specifically stated other than the presence of a SINC in this location.
Evidence analysis	The reference to the SINC in this location points the reader towards Figure 6, which is very distant in the text from this policy, and also is small-scale, not showing the SINC in sufficient detail to support this policy. It is recommended that the SINC boundaries be added to the Figure 2 map, and some accompanying explanation of how the SINC boundaries inform the Local Gap boundary.
Proportionality and gaps	It is clear from the Reg. 14 comments that TVBC consider this policy proportionate, and support in particular the exceptions and flexibility provided by the second sentence. The first sentence is a proportionate and justified objective to preserve the separate identities of King's Somborne and Horsebridge, and appropriate support in this regard from the NPPF (specifically, paragraph 127 c) and d)) should be added to the supporting text. Although the NPPF does not specifically refer to the need to avoid coalescence, it does require planning policies to be sympathetic to local character and history, which here could be interpreted as the character and history of King's Somborne and Horsebridge as two separate settlements.
Effectiveness of policy	The addition of a map (Figure 2) showing the area to which the policy applies is an appropriate response to TVBC's Reg. 14 comments, makes the policy significantly more effective, and will improve the policy's performance at the next round of consultation.
Conformity check	In their Reg. 14 comments, TVBC stated that the principle of this policy was generally consistent with the Local Plan. It is considered consistent with national policy.
Conclusion and recommendations	<p>This policy is likely to meet the Basic Conditions and is in conformity with local and national policy.</p> <p>It is recommended that the SINC boundaries be added to the Figure 2 map, references to the more distant Figure 3 be removed, and additions made to the supporting text to explain how the SINC boundaries inform the Local Gap boundary.</p>

Reference to the NPPF (specifically, paragraph 127 c) and d)) should be added to the supporting text. Although the NPPF does not specifically refer to the need to avoid coalescence, it does require planning policies to be sympathetic to local character and history, which here could be interpreted as the character and history of King's Somborne and Horsebridge as two separate settlements.

Policy name and number	KS/E3 Local Green Space
Summary of policy intent	Identifies thirteen local open spaces that are intended to be protected as green space (namely: Muss Lane Recreation Ground, King's Somborne Cemetery and extension - Stockbridge Road, Paddock opposite the Old Vicarage - Old Vicarage Lane, St Peter & St Paul's Churchyard, Playing Field by Village Hall, John of Gaunt's Palace Site, Field to south of playing field, Allotments ~Furzedown Road, Up Somborne Recreation Ground, Lovell's Fannyard, Up Somborne, Up Somborne Down, Banks/verges either side of Somborne Stream between The Old Vicarage and The Corner Shop and Area Directly behind Manor Farm House and the Long Barn).
Evidence source and type	Neighbourhood Plan Appendix 1.2- Green Space
Evidence analysis	<p>Appendix 1.2 uses incorrect terminology and does not reference national policy. The correct term to use throughout is 'local green space', not 'green space' or 'local area of green space'. This may seem like a minor point, but it is crucial to demonstrate that the Plan evidence base has been prepared with appropriate reference to national and local policy. In the same way, the Appendix needs to reference the NPPF, which is the key policy document on local green space, in particular paragraphs 99-101¹⁶. While the bullet points on page 3 are indeed based on NPPF paragraph 100 b), this needs to be referenced, with surrounding text also quoted for context. Likewise, the text 'The local areas of green space (LAGS) below have been determined by identifying areas within the Parish that potentially meet the criteria set out within the Neighbourhood Development Plan' is incorrect. The criteria are set out in the NPPF, not the Neighbourhood Plan. As this is an evidence document, it should not cite the Neighbourhood Plan for support as otherwise circularity results (i.e. information should flow from the evidence base into policy and not vice-versa).¹⁷</p> <p>The point on Page 3 about ownership of Furzedown Road Allotments is irrelevant. Land can be designed as local green space irrespective of ownership.</p>

¹⁶ However, the policy's supporting text itself references NPPF paragraph 99, which is helpful.

¹⁷ The only exception to this direction of flow is when an adopted plan is being monitored and reviewed ready for its next iteration, but that is not relevant in this case.

	<p>It is helpful that the Appendix references TVBC's Identifying Local Areas of Green Space guidance¹⁸, but it should be noted that its NPPF references are now out of date as it refers to the 2012 and not the 2019 NPPF.</p> <p>The methodology/approach to why sites should be designated as local green spaces is generally clear and robust. However, in the case of the Paddock between Park Pale and Sluice, it should be noted that it could still be designated as local green space even if the landowner objects, if there is sufficient evidence that it is valued by the local community, though of course there is no requirement to go down this route.</p> <p>It is difficult to cross-reference the sites in the table in the Assessment of Suitability section with the maps in Section 5. A final column should be added to the Section 4 table with the map reference from Section 5. It is not clear what the inset at the top left of the map on page 14 is showing.</p>
Proportionality and gaps	<p>In their Reg. 14 response, Historic England asked if it would be possible for this policy to be more specific about the historic significance of the local green spaces, and this remains a gap because it does not yet appear. This should, however, be referenced in the Appendix and/or the supporting text rather than in the policy itself.</p> <p>The policy itself includes some track changes text stating 'Area Directly Behind Manor Farm House and the Long Barn'. However, it is not clear if this is the same site as 'Meadows behind Spencer's Farm (Cottages) and Manor Farm House up to Pine Mead and Stockbridge Road' in Appendix 1.2. There is a risk of confusion if policy text is directly updated like this without the corresponding evidence being updated at the same time. If this is a site intended to be added in a future iteration of the policy, it would be more advisable to mention it in a comment box rather than adding it to the text itself, as otherwise there is a risk it may accidentally become a permanent addition to policy without the corresponding evidence having been updated in the same way.</p>
Effectiveness of policy	<p>In TVBC's Reg. 14 comments, the principle of the Local Green Space policy was supported, as well as the NPPF reference. The Council also supported the Local Green Space Report as evidence providing justification for Local Green Space designations. Paragraph 3.14 in the supporting text to the policy responds effectively to the TVBC suggestion that a 'direct and accessible reference to the basis on which they [i.e. Local Green Spaces] have been selected' be provided, as well as referencing the Local Green Space Report itself. It is also encouraging to see that the TVBC suggestion that maps of the Local Green Spaces be added. All of these changes are improvements that make the policy significantly more effective.</p>

¹⁸ At <https://www.testvalley.gov.uk/assets/attach/2763/Identifying-Local-Areas-of-Green-Space.pdf>

Conformity check	Subject to the relevant minor changes being made to the language in Appendix 1.2 so that it aligns better with the NPPF, the policy is in conformity with relevant local and national policy.
Conclusion and recommendations	<p>The policy is on track to meet the Basic Conditions. However, it is subject to the results of AECOM's separate assessment of Local Green Spaces.</p> <p>Note also that its key evidence document, Appendix 1.2, uses incorrect terminology throughout and does not reference national policy. The correct term to use is 'local green space', not 'green space' or 'local area of green space'. This may seem like a minor point, but it is crucial to demonstrate that the Plan evidence base has been prepared with appropriate reference to national and local policy. In the same way, the Appendix needs to reference the NPPF.</p> <p>It is difficult to cross-reference the sites in the table in the Assessment of Suitability section with the maps in Section 5. A final column should be added to the Section 4 table with the map reference from Section 5. It is not clear what the inset at the top left of the map on page 14 is showing.</p> <p>In their Reg. 14 response, Historic England asked if it would be possible for this policy to be more specific about the historic significance of the local green spaces, and this remains a gap because it does not yet appear. This should, however, be referenced in the Appendix and/or the supporting text rather than in the policy itself.</p> <p>If new sites are to be added or any to be deleted based on the conclusions of the AECOM assessment of Local Green Spaces, it is advisable to update the evidence base first before writing them into the policy; one solution could be to mention them in comments boxes rather than in the policy text itself.</p>

Policy name and number	KS/E5 Archaeology
Summary of policy intent	Where development proposals could affect sites of archaeological interest or where it is reasonable to expect that previously unidentified remains might be present, proposals should be informed by an appropriate archaeological investigation. There will be a presumption in favour of the preservation in situ of all potentially significant archaeological deposits or, where not possible, recorded for deposition within a public archive. Where remains would be affected by development, the enhancement of the understanding and appreciation by the public of significant archaeological sites through the provision of well-designed interpretation materials or landscape features will be supported. Recording of archaeological remains that would be lost as part of development will not be regarded as a public benefit that would be weighed against the harm caused by their loss.
Evidence source and type	King's Somborne Archaeology Maps; Hampshire Historic Environment Records, Conservation Area Policy 1987, Archaeology and Historic Buildings Record, John of Gaunt Deer Park Map, Historic Building Maps, John of Gaunt Deer Park Pale information
Evidence analysis	The evidence referenced in the supporting text to the policy is appropriate, proportionate and rich in detail.
Proportionality and gaps	It is not clear why this is the only policy that sits in a sub-section headed 'Conservation Area, Heritage Buildings and Heritage Sites'. If the intention is to retain only this policy in the section, the section would better be named 'Archaeology'. In their Reg. 14 response, Historic England called for the Neighbourhood Plan to ensure that archaeological remains are conserved 'in a manner appropriate to their significance', which is the NPPF approach/wording. However, Part 2 of KS/E5 does not take account of such an approach, rather seeking to preserve <u>all</u> potentially significant archaeological deposits in situ where possible. As such, Part 2 should be reworded to align better with NPPF paragraph 184.
Effectiveness of policy	Parts 1 and 2 of the policy are considered effective. However, in Part 3, it is not logical to state that recording of archaeological remains that would be lost as part of development will not be regarded as a public benefit and this also risks conformity with RLP policy E9:Heritage. Clearly, any record of what is lost is preferable to loss without record of what has been lost and, in this sense, there is some benefit, however small, attached to the former. Rather, the text should be reworded to state 'recording of archaeological remains that would be lost as part of development will not be regarded as offsetting their loss'. This would be much clearer for a development management officer to interpret and hence make the policy significantly more effective.

Conformity check	Part 1 of the policy is in conformity with local and national policy. With minor rewording, Parts 2 and 3 can be made in conformity as noted above.
Conclusion and recommendations	<p>The evidence referenced in the supporting text to the policy is appropriate, proportionate and rich in detail.</p> <p>Part 2 needs to be aligned with national policy (NPPF paragraph 184), rather than seeking to preserve all potentially significant archaeological deposits in situ where possible.</p> <p>In Part 3, the text should be reworded to state 'recording of archaeological remains that would be lost as part of development will not be regarded as offsetting their loss'. This would be much clearer for a development management officer to interpret and hence make the policy significantly more effective, as well as bringing it into line with local policy.</p> <p>Part 1 of the policy is in conformity with local and national policy. With minor rewording, Parts 2 and 3 can be made in conformity as noted above.</p>

Policy name and number	KS/E6 Flooding and Water Management
Summary of policy intent	Bridges crossing the Bourne or other drainage ditches shall be designed and installed such that they do not impede the flow area, including making an allowance for climate change. Developers shall demonstrate that Sustainable Drainage Systems (SuDS) have been properly considered and applied within the layout and proposals for the development. Priority shall be given to use of infiltration drainage techniques. In order to mitigate against potential groundwater flooding, finished ground floor levels should be at a minimum 300mm above surrounding ground levels. Solid concrete floor slabs should be used for all properties and engineering bricks should be used to a height of 800mm above surrounding ground levels. Applications which increase the flows of wastewater into the sewerage system must be accompanied by a detailed drainage strategy for foul sewerage and surface water disposal and must not be occupied until adequate wastewater treatment facilities exist.
Evidence source and type	King's Somborne Flood Risk Study (Waterco, 2018), which was commissioned following feedback at Reg.14 consultation that there was insufficient flood evidence supporting the Plan. Sequential Test Report (South Downs National Park) is referenced in the supporting text but does not appear to have informed the policy itself.
Evidence analysis	<p>The TVBC comment at Reg. 14 stage that flood maps could be added to the supporting text has now been acted on, which is welcomed.</p> <p>The Flood Risk Study appears to be a robust, helpful source of evidence for the policy. It is clear from Appendix C of the Study that it was informed by EA comments on a draft, which gives confidence as to its robustness.</p> <p>However, it is not clear why the policy text (engineering bricks to a height of 800mm above surrounding ground levels) departs from the Flood Risk Study's own recommendation (600mm above surrounding ground levels). If this is a typo, it should be corrected. If it is intentional, it needs justification.</p> <p>The Sequential Test Report, unlike the Flood Risk Study, is really only applicable to the proposed specific site allocations, which are not covered by this policy. As such, reference to it can be removed from the supporting text (because it did not inform the policy anyway) as long as it continues to be referenced in the supporting text for policies KS3A, KS5A, KS6A and KS7A.</p>

<p>Proportionality and gaps</p>	<p>TVBC comments at Reg. 14 supported the principle of providing locally specific information about parish watercourses.</p> <p>The rest of the neighbourhood plan, quite correctly, sets policy for a) specific development sites and b) for any other (i.e. speculative or currently unplanned) development that may come forward during the lifetime of the plan. Ensuring that b) is covered as well as a) is, for example, the purpose of the Design Guide in terms of heritage and conservation. In this context it is not clear why policy KS/E6 cannot do the same for speculative sites that may come forward that are at risk from the various sources of flooding identified. KS/E6 currently sets out only some but not all of the recommendations of the Flood Risk Study. Although it is understood that this may be because the Flood Risk Study was commissioned only to assess specific allocated sites and not development in general, its more generic recommendations for flood mitigation would be equally valid for similar developments that may come forward on non-allocated sites.¹⁹ As such, the policy could be added to in the terms described in the Effectiveness of Policy section below.</p> <p>The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of the river bank, and the design of any development within this area needs to be in line with their guidance.</p>
<p>Effectiveness of policy</p>	<p>As written, KS/E6 consists of four parts, but only part 3 is clearly derived from Flood Risk Study recommendations (although Part 2 of the policy requires consideration of SuDS, the term SuDS is not actually used in the text of the Flood Risk Study; instead, it provides significant detail on the individual components of a SuDS approach, such as box planters). As such, policy effectiveness would be improved if further parts could be added to it that set out these detailed recommendations (reworded slightly for proportionality and to apply only to developments requiring planning permission that deliver one or more net new dwellings, or comprise commercial development), including:</p> <ul style="list-style-type: none"> -the recommendation that developable areas be limited to Flood Zone 1; -the requirement, where appropriate and proportionate, for detailed hydraulic modelling of Somborne Stream, or where this has already taken place, that it informs the development approach to flood mitigation;

¹⁹ This was confirmed to AECOM by report authors Waterco in a telephone call on 4th December 2020.

	<ul style="list-style-type: none"> -the requirement for groundwater monitoring to be undertaken as part of any ground investigation works, and that these works should inform foundation design and design of the drainage system; -any Flood Risk Assessment, where required by TVBC and/or the EA, to be based on the findings of hydraulic modelling, and include a Drainage Strategy; -the requirement for surface water discharge to be to Somborne Stream and restricted to greenfield runoff rates; -the requirement, where appropriate, for attenuation storage systems designed to accommodate runoff during all storm events up to and including the 1 in 100 year plus 40% climate change event. - the requirement, where appropriate, for below ground attenuation tanks or modular storage to be designed as sealed systems, to facilitate gravity drainage, and to prevent uplift (floatation) of the tanks when the groundwater table is high and to prevent ingress of groundwater; and -the use of further flood mitigation measures should be considered where appropriate, including box planters, rainwater harvesting and water butts
Conformity check	<p>TVBC comments at Reg. 14 stage supported the policy in terms of conformity but left detailed comments for the Environment Agency. Given that the Environment Agency commented both at Reg. 14 and on the draft Flood Risk Study, it is considered that the policy is in conformity with local and national policy.</p>
Conclusion and recommendations	<p>The policy, in broad terms, appears to meet the Basic Conditions. The Flood Risk Study appears to be a robust, helpful source of evidence for it.</p> <p>However, it is not clear why the policy text (engineering bricks to a height of 800mm above surrounding ground levels) departs from the Flood Risk Study's own recommendation (600mm above surrounding ground levels). If this is a typo, it should be corrected. If it is intentional, it needs justification.</p> <p>The Sequential Test Report, unlike the Flood Risk Study, is really only applicable to the proposed specific site allocations, which are not covered by this policy. As such, reference to it can be removed from the supporting text.</p> <p>TVBC comments at Reg. 14 supported the principle of providing locally specific information about parish watercourses.</p> <p>KS/E6 currently sets out only some but not all of the recommendations of the Flood Risk Study. Although it is understood that this may be because the Flood Risk Study was commissioned only to assess specific allocated sites and not development in general, its more generic recommendations for flood mitigation would be equally valid for similar developments that may come forward on non-allocated sites.</p>

The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of the river bank, and the design of any development within this area needs to be in line with their guidance.

Policy effectiveness would be improved if further parts could be added to it that set out these detailed recommendations (reworded slightly for proportionality and to apply only to developments requiring planning permission that deliver one or more net new dwellings, or comprise commercial development), including:

- the recommendation that developable areas be limited to Flood Zone 1;
- the requirement, where appropriate and proportionate, for detailed hydraulic modelling of Somborne Stream, or where this has already taken place, that it informs the development approach to flood mitigation;
- the requirement for groundwater monitoring to be undertaken as part of any ground investigation works, and that these works should inform foundation design and design of the drainage system;
- any Flood Risk Assessment, where required by TVBC and/or the EA, to be based on the findings of hydraulic modelling, and include a Drainage Strategy;
- the requirement for surface water discharge to be to Somborne Stream and restricted to greenfield runoff rates;
- the requirement, where appropriate, for attenuation storage systems designed to accommodate runoff during all storm events up to and including the 1 in 100 year plus 40% climate change event.
- the requirement, where appropriate, for below ground attenuation tanks or modular storage to be designed as sealed systems, to facilitate gravity drainage, and to prevent uplift (floatation) of the tanks when the groundwater table is high and to prevent ingress of groundwater; and
- the use of further flood mitigation measures should be considered where appropriate, including box planters, rainwater harvesting and water butts

Policy name and number	KS/E7 Biodiversity
Summary of policy intent	<p>Development on greenfield sites and sites that support or are in close proximity to suitable commuting and foraging habitat require an Initial Preliminary Ecological Appraisal and may also require suitable buffers. Development proposals with a potential impact on Mottisfont Bats SAC will be subject to a project level HRA to determine the potential for likely significant effects. Development that contributes to the network of habitats identified in the Biodiversity Opportunity Area will be supported. Existing trees and hedgerows should be integrated into the proposed landscaping schemes for the development and provide a management plan for their future care and maintenance.</p> <p>Where replacement or new trees and hedgerows are proposed, replacement planting must be with appropriate locally native species unless there are overriding reasons to do otherwise. Species should be particularly suitable to the location, including variety, height, density and soil type; tree plantings should be given sufficient space to develop into their natural size and shape: and succession planting should be considered where existing plantings are mature or over-mature.</p>
Evidence source and type	Shadow Habitats Regulation Assessment (ECOSA, 2018) Mapping and data from Hampshire Biodiversity Information Centre ²⁰
Evidence analysis	<p>The key conclusion of the Shadow HRA- namely, that project-specific HRA screening reports would be required for development proposals with a potential impact on Mottisfont Bats SAC- has been carried through clearly and effectively into the policy.</p> <p>The mapping from Hampshire Biodiversity Information Centre is a useful addition to the supporting text and justifies the policy clearly.</p>
Proportionality and gaps	<p>As worded, the policy is confusing. Firstly, for which species is the suitable 'commuting and foraging habitat'? Bats, or other/all animals? Secondly, as worded, the policy could be misapplied to development that does not affect that habitat even though it is close to it and vice versa (development that affects it but is not close to it). This can easily be solved by replacing 'support or are in close proximity to' with 'where development would impact on'. The second paragraph (covering impacts on Mottisfont Bats SAC) can be deleted as it is already required by the RLP (see paragraphs 7.34 and 7.35, which themselves restate national policy in any case).</p>

²⁰ At <https://www.hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre>

	<p>In Natural England's Regulation 14 response, they highlighted that there is BAP Priority Habitat both within and around the boundary of the Neighbourhood Plan and that it should be considered when locating new development, and opportunities taken to enhance its ecological value, including through planning gain, to contribute to preserving and protecting its integrity. However, there is no mention of the BAP Priority Habitat in either the supporting text or the policy itself, and the policy does not mention the potential for contributions from new development to enhance its value. AECOM understands from the Parish Council that reference to the BAP was omitted from the policy itself so as not to duplicate/overlap with Policy E5 in the Test Valley Replacement Local Plan (which is good practice), but to make this clear for the avoidance of doubt, policy E5 should be referenced in the supporting text if not in the policy itself.</p> <p>TVBC Reg. 14 comment that the policy was too general and needed to be reworded to focus only on development that specifically related to/had an impact on biodiversity has now been addressed, and this is welcomed.</p>
Effectiveness of policy	<p>The policy might be more effective if point 3 'development that contributes to the network of habitats identified in the Biodiversity Opportunity Area will be supported' were moved to be point 1 as it feels more like the main thrust/headline for the policy rather than lower down in the list.</p>
Conformity check	<p>Subject to the changes recommended above, the remainder of the policy is in general conformity with RLP Policies E5: Biodiversity and E6: Green Infrastructure.</p>
Conclusion and recommendations	<p>The policy is on track to meet the Basic Conditions but needs some minor amendments before submission.</p> <p>The key conclusion of the Shadow HRA has been carried through clearly and effectively into the policy.</p> <p>The policy wording is confusing. This can easily be solved by replacing 'support or are in close proximity to' with 'where development would impact on'. The second paragraph (covering impacts on Mottisfont Bats SAC) can be deleted as it is already required by the RLP (see paragraphs 7.34 and 7.35, which themselves restate national policy in any case).</p> <p>There is no mention of considering the BAP Priority Habitat in either the supporting text or the policy itself, and the policy does not mention the potential for contributions from new development to enhance its value. AECOM understands from the Parish Council that reference to the BAP was omitted from the policy itself so as not to duplicate/overlap with Policy E5 in the Test Valley Replacement Local Plan (which is good practice), but to make this clear for the avoidance of doubt, policy E5 should be referenced in the supporting text if not in the policy itself.</p>

The policy might be more effective if point 3 'development that contributes to the network of habitats identified in the Biodiversity Opportunity Area will be supported' were moved to be point 1 as it feels more like the main thrust/headline for the policy rather than lower down in the list.

Subject to the changes recommended above, the remainder of the policy is in general conformity with RLP Policies E5: Biodiversity and E6: Green Infrastructure.

Policy name and number	KS/E8 The Somborne
Summary of policy intent	Development proposals that would adversely affect the appearance and setting, biodiversity value and natural seasonal function/processes of the Somborne will not be supported. Development that would lead to an adverse impact on the River Test SSSI into which the Somborne feeds will not be supported.
Evidence source and type	Mapping (i.e. River Test SSSI boundaries) and data from Hampshire Biodiversity Information Centre Information from Natural England's Reg. 14 response
Evidence analysis	The supporting text for the policy, in particular 3.31 and 3.32, is clear and strong. However, it needs to more clearly reference data sources and provide relevant context, for example that the River Test SSSI boundary is within the parish (as such, it may be worth renaming the policy The River Network or similar, to reflect that it covers not just the Somborne but also the River Test, and the River Test SSSI including but not limited to Park Stream), and that the policy and supporting text relies on information from Natural England as well. The supporting text should also reference relevant NPPF paragraphs, including 122 d) and 127 c) on character, setting and appearance
Proportionality and gaps	<p>Point d) of Part 1 of the policy can be deleted because it repeats RLP Policy E7: Water Management. While the second part of the policy text covers similar ground to RLP Policy E5: Biodiversity, and also national policy, it is understood that it should be retained given that Natural England, in its Reg. 14 response and in its Screening Opinion for the SEA and HRA specifically advised that the Plan reference the River Test SSSI in this way.</p> <p>The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of any river bank, and the design of any development within this area needs to be in line with their guidance.</p> <p>The policy is currently sitting in the Biodiversity section of the neighbourhood plan. It is understood why this is the case, but it may be more logical to move it to the Flooding and Water Management section just above.</p>
Effectiveness of policy	<p>Supported by the NPPF wording, the policy could be made more effective by adding to a) 'appearance, character and setting'.</p> <p>Section 2 of the policy, presumably added following Natural England's Reg. 14 comments, makes the policy much stronger, but the policy would be made even more effective if Section 2 were deleted and simply merged</p>

	into the text of 1 above the lettered points, thus: 'Development proposals that would adversely affect the following features of the Somborne, Park Stream, River Test and the River Test SSSI will not be supported:'
Conformity check	The policy is in conformity with local and national policy.
Conclusion and recommendations	<p>The policy appears to meet the Basic Conditions.</p> <p>The supporting text for the policy, in particular 3.31 and 3.32, is clear and strong. However, it needs to clearly reference data sources and provide relevant context, as well as quote relevant national policy.</p> <p>Point d) of Part 1 of the policy can be deleted because it repeats RLP Policy E7: Water Management.</p> <p>The policy could add that, as advised by the EA, a flood risk activity permit will need to be obtained from them for works within eight metres of any river bank, and the design of any development within this area needs to be in line with their guidance.</p> <p>The policy is currently sitting in the Biodiversity section of the neighbourhood plan. It is understood why this is the case, but it may be more logical to move it to the Flooding and Water Management section just above.</p> <p>Supported by the NPPF wording, the policy could be made more effective by adding the word 'character' to a). Furthermore, the policy would be made even more effective if Section 2 were deleted and simply merged into the text of 1 above the lettered points, thus: 'Development proposals that would adversely affect the following features of the Somborne, Park Stream, River Test and the River Test SSSI will not be supported:'</p> <p>For similar reasons, the policy would be more effective if renamed 'The River Network' or similar rather than just 'The Somborne'.</p>

Policy name and number	KS/F2 Utilities
Summary of policy intent	Services of all new developments shall be routed underground where possible so as not to impact on the street scene and reliability. New residential and regularly occupied non-residential premises should be superfast broadband-enabled.
Evidence source and type	None specified, although NPPF and Local Plan referenced
Evidence analysis	Any reference to national and local policy in the supporting text is helpful. As no specific comments were made at Reg.14 by relevant infrastructure providers, there is likely no need to reference any other sources.
Proportionality and gaps	In their comments at Reg. 14 stage, TVBC noted that it may not be possible or viable for all new development to route services underground or to include the latest technologies. The Council suggested instead that the policy be reworded to seek such requirements and that it is for the applicant to demonstrate why it cannot be achieved. In their response to the TVBC comments, KSPC added the words 'where possible' and 'when available in the area' to address this point, and this is welcomed. A separate TVBC comment noted that individual site allocations policies might be a more appropriate location to cover waste water rather than the supporting text of this policy, and this recommendation also appears to have been addressed.
Effectiveness of policy	The phrasing in part one of the policy is slightly unusual and the policy would be more effective if it were reworded- namely, rather than 'perpetuate the impact on', 'adversely impact' would be clearer. In addition, there is no technical evidence supporting the plan that reliability is affected by whether services are routed underground or not. In comments on the draft report, the Parish Council again stated that underground cables are more reliable than overground. AECOM does not dispute this but, again, technical evidence needs to be cited to support this statement if it is to appear in the neighbourhood plan.
Conformity check	Now that the changes recommended by TVBC at the Reg. 14 stage have been added, the policy is in conformity with relevant local and national policy.
Conclusion and recommendations	<p>The policy is on track to meet the Basic Conditions.</p> <p>The reference to national and local policy in the supporting text is helpful. As no specific comments were made at Reg.14 by relevant infrastructure providers, there is likely no need to reference any other sources.</p>

The policy is more proportionate, effective and in conformity with national and local policy now that relevant TVBC comments at the Reg. 14 stage have been addressed.

The phrasing in part one of the policy is slightly unusual and the policy would be more effective if it were reworded- namely, rather than 'perpetuate the impact on', 'adversely impact' would be clearer. In addition, there is no technical evidence supporting the plan that reliability is affected by whether services are routed underground or not.

In comments on the draft report, the Parish Council again stated that underground cables are more reliable than overground. AECOM does not dispute this but, again, technical evidence needs to be cited to support this statement if it is to appear in the neighbourhood plan.

Policy name and number	KS/H1 Quantity of New Homes Needed
Summary of policy intent	The NDP intends to allocate sites for 40 new homes over the next fifteen years. The type of homes, including the mix of affordable homes required within the Parish, shall be reviewed on a regular basis to ensure that the need is matched to the overall supply as closely as possible.
Evidence source and type	Housing Need and Sites report (King's Somborne Parish Council)
Evidence analysis	The Housing Need and Sites report appears robust in terms of quantity, but it has not been assessed for its conclusions on affordable housing given that this no longer forms a plan policy in its own right. TVBC have indicated to AECOM that they consider the report and its conclusions robust in terms of quantity.
Proportionality and gaps	<p>TVBC comments at Reg. 14 did not dispute the assessment of quantity of new homes needed. However, since Reg. 14 in 2018, national policy changed (in 2019) such that the NPPF now requires local authorities to provide a specific housing requirement figure to neighbourhood planners (see NPPF paragraphs 65 and 66). As such, AECOM checked with TVBC that the Council supports/remains comfortable with the quantity of new homes needed and the answer is that they are. As such, the quantity of homes needed is considered appropriate, because in practice in the neighbourhood planning system, Examiners tend to rely strongly on evidence of agreement between the LPA and the neighbourhood planners on quantity of homes needed, as long as that quantity is based on some evidence of need that the Council consider is robust, which in this case it is.</p> <p>As a broad principle in the English planning system, it is important to separate out demand-side evidence (i.e. how many homes are needed in future) from supply-side evidence (i.e. the quantity and location of the land needed to accommodate those homes), because the latter should not be seen to constrain the calculations needed for the former (while there is no evidence such constraint has happened at King's Somborne, it is more a case of being seen to follow a clear, robust process). This point is important enough to form the opening sentences of the Government's Planning Practice Guidance (PPG) on housing need²¹, which states: 'Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken</p>

²¹ See <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

	<p>separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.'</p> <p>On this basis, it is strongly recommended that the section heading be renamed from 'quantity and location of new homes' to 'quantity and size of new homes' so that this section remains demand-side only, giving plan users the confidence that demand was assessed first, and then supply (the site allocations) separately after that. Likewise, all supply-side references should be removed from the supporting text here and instead added to the supporting text of the site allocations policies. Specifically, these are: a) the third and last paragraph in the grey box on page 30; b) in the list of Neighbourhood Plan Objectives below it, the second, fourth and sixth bullet points; c) the quoting of Policy COM2 in the grey box on page 31; and d) the last two bullet points in the Where can I find further information? section.</p> <p>At the same time, because housing mix is more of a demand-side than a supply-side issue, it is recommended that the whole of the housing mix section and Policy KS/H7 is moved into this section (after KS/H1 and its supporting text) before the Plan reader gets to the Site Allocations section following.</p>
Effectiveness of policy	<p>As worded, the policy is effective but see our comments on KS/H7 below, which are relevant to the effectiveness of KS/H1 as well (and the links between the two policies provides further justification that they should be in the same section, as recommended above). We consider that the requirement for regular review in this policy is justified and correct, but the wording of KS/H7 should be amended/made more flexible to ensure it is consistent with this requirement.</p> <p>Note that the mix of affordable houses required is a housing <i>tenure</i> issue rather than a housing type issue. Thus, the policy would be more effective if section 2 were reworded to state 'The type, size and tenure of homes.....' (type being more related to size/format, e.g. a two-bed bungalow versus a four-bed semi-detached home)</p>
Conformity check	<p>While supporting text in the neighbourhood plan mentions relevant RLP policies, the policy itself should state that the mix of affordable homes should have regard to RLP policy COM7: Affordable Housing alongside any parish-specific evidence. Having regard to COM7 for housing allocations in neighbourhood plans is itself a requirement of RLP policy COM9: Community Led Development, so the latter policy could also be referenced.</p>

Conclusion and recommendations

The policy is on track to meet the Basic Conditions.

The Housing Need and Sites report appears robust in terms of quantity. AECOM checked with TVBC that the Council supports/remains comfortable with the quantity of new homes needed and the answer is that they are. As such, the quantity of homes needed is considered appropriate, because in practice in the neighbourhood planning system, Examiners tend to rely strongly on evidence of agreement between the LPA and the neighbourhood planners on quantity of homes needed, as long as that quantity is based on some evidence of need that the Council consider is robust, which in this case it is.

Rearrangement of supporting text and Plan sections is needed to better separate demand-side evidence (i.e. how many homes are needed in future) from supply-side evidence (i.e. the quantity and location of the land needed to accommodate those homes), as advised by national planning guidance.

On this basis, it is strongly recommended that the section heading for KS/H1 be renamed from 'quantity and location of new homes' to 'quantity and size of new homes' so that this section remains demand-side only. Likewise, all supply-side references should be removed from the supporting text here and instead added to the supporting text of the site allocations policies. At the same time, because housing mix is more of a demand-side than a supply-side issue, it is recommended that the whole of the housing mix section and Policy KS/H7 is moved into this section (after KS/H1 and its supporting text) before the Plan reader gets to the Site Allocations section following.

As worded, the policy is effective but requires amendments to be made to policy KS/H7 for consistency (which is further justification for the two policies being in the same section)

The mix of affordable houses required is a housing tenure issue rather than a housing type issue. Thus, the policy would be more effective if section 2 were reworded to state 'The type, size and tenure of homes....'

While supporting text in the neighbourhood plan mentions relevant RLP policies, the policy itself should state that the mix of affordable homes should have regard to RLP policy COM7: Affordable Housing alongside any parish-specific evidence. Having regard to COM7 for housing allocations in neighbourhood plans is itself a requirement of RLP policy COM9: Community Led Development, so the latter policy could also be referenced.

Policy name and number	KS/H7 Housing Mix
Summary of policy intent	The policy seeks to ensure that all new residential developments should provide the following mix of properties: 2 bedroom - 45%, 3 bedroom • 45%, and 4 bedroom - 10%. An alternative will only be considered where it can be demonstrated that it is more suitable. This assessment will be strongly influenced by the character of the wider setting of the site. The presumption will always be in favour of smaller homes.
Evidence source and type	Original Neighbourhood Plan survey (KSPC) and additional Housing Needs Survey undertaken in 2017 (Action Hampshire)
Evidence analysis	In their Reg. 14 comments, TVBC welcomed the fact that the policy was based on evidence from a Parish Survey and Housing Needs Survey. AECOM agrees that this makes the policy more robust. However, the evidence of demand for detached homes, bungalows, starter homes and retirement housing set out in the supporting text has not been carried through into the policy itself, which as worded covers housing size only and not housing type (see recommendations below aimed at remedying this gap).
Proportionality and gaps	<p>A public comment on the Reg. 14 consultation called for the Neighbourhood Plan to support self and custom-building. This policy would be the place to do so but currently there is no mention of this issue. While there is no requirement for the policy to support this objective, this would align with national policy and if there is a specific reason not to do so, it should be stated in the supporting text.</p> <p>The policy requires all developments, with no exceptions, to provide 45% 2 bedroom units, 45% 3 bedroom units and 10% 4 bedroom units. This is overly prescriptive as local needs are likely to fluctuate over the plan period. There should be exceptions made where applicants can demonstrate satisfactory evidence of more up-to-date need (see recommended wording below). Additionally, as worded, it would be impossible to apply this policy to developments comprising a total number of dwellings not divisible by 45 or 10, particularly small developments-how would a developer seeking 2 units be able to meet these requirements? Both TVBC comments and a separate public comment at Reg. 14 also pointed out that the predecessor policy (H7) was inflexible in this regard.</p> <p>While it is acknowledged that Part 2 of the policy seeks to add some flexibility in this respect, as referenced in the KSPC comments on the TVBC Reg. 14 responses, it is considered that the text changes still do not go far</p>

	<p>enough. For a start, text changes are required in Part 1 as well (which should state 'in these proportions as a general guideline' or similar flexible wording).</p> <p>Furthermore, and related to this point, there is a text comment requesting clearer definition of the word 'suitable' in the first line of Part 2 of the policy. It is clear from the context that, here, suitable means 'in terms of meeting local housing requirements', but for the avoidance of doubts like those expressed by the commenter, this could be reworded to state 'An alternative approach will only be considered where it can be demonstrated to meet a more up-to-date assessment of parish needs'. It's important to include the word 'parish' here so that changes in the local or national housing need evidence cannot be used as a reason to depart from Section 1.</p> <p>Part 2 should also delete references to character and wider setting. These are not key factors driving exceptions to Part 1 and in any case are supply-side rather than demand-side issues and thus both already adequately covered by the Design Guide and related policies including KS/E1 and KS/H8 in any case.</p> <p>As noted above, there is a gap in that the policy currently covers only housing size despite robust evidence of demand on housing type as well. This could easily be remedied by rewording the final sentence of Part 2 as follows: 'The presumption will always²² be in favour of smaller homes, including detached smaller homes such as bungalows, and any other types of smaller dwelling with gardens suitable as starter homes or for retirement living'.</p>
Effectiveness of policy	The recommended changes to policy wording in the Proportionality and Gaps section above would have the added benefit of making the policy far more effective in terms of being easier to apply and understand.
Conformity check	With slight rewording as noted above just to make it clearer that the requirement for added flexibility called for by TVBC in their Reg. 14 comments has been definitively taken on board, the policy is considered to be in conformity with local and national policy.
Conclusion and recommendations	<p>The policy needs minor amendment in order to meet the Basic Conditions.</p> <p>The evidence of demand for detached homes, bungalows, starter homes and retirement housing set out in the supporting text has not been carried through into the policy itself, which as worded covers housing size only and</p>

²² It is recommended that the word 'always' be deleted because the situation could change over the Plan period, though the evidence is strong enough at present to justify keeping the text 'the presumption will be...'

not housing type. This could easily be remedied by rewording the final sentence of Part 2 as follows: 'The presumption will always be in favour of smaller homes, including detached smaller homes such as bungalows, and any other types of smaller dwelling with gardens suitable as starter homes or for retirement living'.

A public comment on the Reg. 14 consultation called for the Neighbourhood Plan to support self and custom-building. This policy would be the place to do so but currently there is no mention of this issue. While there is no requirement for the policy to support this objective, this would align with national policy and if there is a specific reason not to do so, it should be stated in the supporting text.

The percentage mix in the policy as worded is overly prescriptive as local needs are likely to fluctuate over the plan period. There should be exceptions made for smaller developments and to the existing Part 2 text to make it clearer in terms of cases where applicants can demonstrate satisfactory evidence of more up-to-date need. For this reason, text changes are required in Part 1 (which should state 'in these proportions as a general guideline' or similar flexible wording) and the first sentence of Part 2 could be reworded to state 'An alternative approach will only be considered where it can be demonstrated to meet a more up-to-date assessment of parish needs'. It's important to include the word 'parish' here so that changes in the local or national housing need evidence cannot be used as a reason to depart from Section 1.

Part 2 should also remove any reference to character or wider setting, as these are supply-side issues not appropriate for a demand-side policy and are already covered by separate supply-side policies in any case.

The recommended changes to policy wording set out above would have the added benefit of making the policy far more effective in terms of being easier to apply and understand.

Policy name and number	KS/H8 Design
Summary of policy intent	New development should demonstrate how it meets the King's Somborne Design Guidance. It should also aim to fit comfortably, respecting the character and scale of local buildings, including consideration of the landscape, rural character and local distinctiveness; the wider impact a development might have, such as levels of activity or light pollution; the effect on boundaries, access and highway impacts; protecting and supporting biodiversity, relevant heritage matters and embracing sustainable technologies. The policy also sets out ten more detailed criteria that need to be met for multi-plot residential developments that are also set out in the design guide. Finally, sufficient off-road parking should be provided to ensure there is no detrimental impact on the surrounding roads.
Evidence source and type	The NPPF and the Local Plan are referenced in the supporting text, but the only locally-specific evidence cited in the policy itself is the King's Somborne Parish Council Design Guidance.
Evidence analysis	<p>The Design Guidance states in its introduction that it is a Supplementary Planning Document (SPD) but this is not correct and should be deleted. There is no such thing as SPDs at Neighbourhood Plan level and they can only be developed by local authorities to support a specific adopted Local Plan policy. Rather, the Design Guidance is evidence supporting the Neighbourhood Plan.</p> <p>The principle of underpinning this policy with parish-specific Design Guidance is supported, and it is noted that it was described by Historic England at Reg. 14 as 'thorough and pragmatic'- but this does not mean it cannot be improved further, particularly given the concern expressed by TVBC in its Reg. 14 comments that the Design Guide may not be applicable to all types of development.</p> <p>AECOM notes that there is no mention in the supporting text, the policy, or indeed in the Design Guidance itself, of the King's Somborne Conservation Policy (effectively, the Conservation Area Appraisal) that applies to the Conservation Area. This is a significant gap because without it, the Design Guidance, though useful, is quite generic, i.e. it could be applied to most places with a rural village character. While it is accepted that the Conservation Policy is itself deficient (it is very old [1987] and may need updating, and it is itself generic other than the section 'The Character of the Village'), it remains the only village-specific policy that continues to inform TVBC development management decisions from a heritage and conservation viewpoint and hence is important in this regard. Therefore, cross-references as appropriate to the King's Somborne Conservation Policy, in</p>

	<p>particular 'The Character of the Village' section, should be added to the Design Guidance. Local Planning Authorities are required from time to time to update their Conservation Area appraisals²³ and there is a case for this to happen here, informed as necessary by local consultation and/or the Design Guide, which will make both documents stronger. However, even if no update is forthcoming before Neighbourhood Plan adoption, it should still be referenced within and inform KS/H8 as it remains important locally-specific evidence at the Test Valley level, informing relevant DM decisions.</p> <p>It is not clear how the Design Guidance requirements were developed and where they come from, although in comments on the draft of this EBPD, the Parish Council noted that it was based on examples from the New Forest Parks Authority and Malmesbury Neighbourhood Plan (Wiltshire). The Plan states that the Design Guidance 'is being consulted on alongside this draft plan' but a) there is no mention in the Design Guidance itself of how its content was developed or by whom and b) as an evidence document, it is not necessary for the Design Guide to be subject to a Regulation 14 consultation alongside the Plan itself. Rather, the Design Guidance only requires consultation within the parish. Nevertheless, if consultees provided comments at Regulation 14, these can be incorporated. The process of this consultation, its outputs, and how those outputs informed its content, need to be clearly stated in the Design Guidance because it is quite prescriptive (with long lists of do's and don'ts)²⁴ and currently it is not clear who decided what those rules should be or where they came from.</p> <p>In their Reg. 14 comments, Historic England seem to have overlooked the fact that if the Design Guidance were more closely tied to the Conservation Area and its Policy, this would help address their other concerns about local heritage assets not being taken into account sufficiently throughout the rest of the Plan.</p>
<p>Proportionality and gaps</p>	<p>AECOM agrees with the TVBC comment at Reg. 14 above, namely that the Design Guide may not be applicable to all forms of development, given that for the purposes of the planning system, what constitutes 'development'</p>

²³ See <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/heag-268-conservation-area-appraisal-designation-management/>

²⁴ Two separate public comments at Reg. 14 consultation considered the Design Guidance to be too prescriptive- while AECOM understands these viewpoints, it is noted that Historic England (and other statutory consultees) had no objections in this regard, and it is considered that policies based on it still have a good chance of passing at Examination subject to the relevant recommendations set out in this policy review being implemented.

is relatively broad (as defined by Section 55 of the Town and Country Planning Act 1990²⁵, namely 'the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land'). This can even include, for example, the removal of topsoil or the digging of a trench. As such, it is considered that the current wording of this policy ('Proposals for new developments should....') is too broad and does not allow for exceptions for this kind of minor development. It would be easy to remedy this simply by adding the text 'where appropriate' or similar.

Because the Design Guidance is a long, detailed document that is prescriptive throughout, it may be unnecessarily confusing and difficult for applicants to refer to when preparing an application and for DM officers to use when determining applications. The policy requires applications to meet the 'guidelines' within the Design Guidance, but the document does not contain a section or heading called 'guidelines'. It would therefore be better reworded to state that 'applications will be tested against the Checklists in the Design Guidance', but as noted above, these checklists need a far clearer explanation of how they were developed, the extent of local input to them, and how they take into account the Conservation Policy.

Part 2 a) of the policy overlaps with RLP Policy E1: High Quality Development in the Borough and thus can be deleted. Parts 3 a) and c) overlap with RLP Policy LHW4: Amenity and thus can be deleted. Any policy text on parking should at least reference RLP policy T2: Parking Standards and associated Annex G, and this point was also made by both TVBC and HCC in their separate Reg. 14 responses but has not yet been addressed (other than by referencing T2 in the supporting text and by deleting the predecessor Policy F5, as noted in the KSPC response to TVBC's Reg. 14 comments).

It is recommended that the supporting text paragraph on removal of permitted development rights is deleted. Firstly, it is speculative and risks inflating resident expectations on an issue that is outside the Parish Council's control. Secondly, it is not carried through to the policy (and should not be) so is unnecessary in any case. Thirdly, given the extent of the Conservation Area, there is a strong degree of control of these issues already. Rather than seeking changes to permitted development rights, the energies of the Parish Council would be better directed towards seeking a more robust update of the now out-of-date Conservation Policy and ensuring that

²⁵ Available at <https://www.legislation.gov.uk/ukpga/1990/8/section/55>

	<p>update is consistent with the Design Guide (see comments above). Removal of permitted development rights can only be done through what is known as an Article 4 Direction under the General Permitted Development Order²⁶, and only the local planning authority can make such a direction. In the case of TVBC, only seven Article 4 Directions have been made since 1972, none more recent than 2009, i.e. none connected to a Neighbourhood Plan²⁷, and all relating to small sites/individual properties rather than a whole parish or village.²⁸</p>
Effectiveness of policy	<p>Once the policy text has been changed to state that applications will be tested against the Checklists in the Design Guidance, the policy can be made significantly shorter and hence more powerful and effective, because all of 3 a) to j) could be deleted. Currently, including 3 a) to j) in the policy is confusing because this results in two different types/levels of Design Guidance requirements- those not cited in the policy and those that are. Plan users are thus not clear if the requirements in 3a) to j) are more important or have a different status to the other Design Guidance requirements not referenced. Rather, it would be much clearer if all Design Guidance content appearing in the Checklists is seen as equally important. Moving detailed Design Guidance requirements out of the policy and into the supporting text is also a suggestion made by TVBC in their Reg. 14 comments.</p> <p>Finally, it is also noted that Historic England expressed significant concern at Regulation 14 stage, and subsequently, that insufficient account was taken of the Conservation Area and heritage assets in site allocation policies. As well as remedying those policies, referencing the Conservation Area and heritage considerations in the policy text itself as well as the Design Guide (as per recommendation above) would be an important step in the right direction.</p>
Conformity check	<p>Points b) to f) of Part 2 add nuance to and are in conformity with Policy E1 and national planning policy. The remainder of the policy can be made in conformity with local and national policy subject to the changes recommended above.</p>
Conclusion and recommendations	<p>The policy is on track to meet the Basic Conditions.</p> <p>The principle of underpinning this policy with parish-specific Design Guidance is supported. However, the Design Guidance states in its introduction that it is a Supplementary Planning Document (SPD) but this is not correct and should be deleted. Additionally, the Design Guide may not be applicable to all types of development. The</p>

²⁶ See <https://www.legislation.gov.uk/ukxi/2015/596/contents/made>

²⁷ Neighbourhood planning was introduced in 2011.

²⁸ See <https://www.testvalley.gov.uk/planning-and-building/article-4-directions>

current wording of this policy ('Proposals for new developments should....') is too broad and does not allow for exceptions for very minor development. It would be easy to remedy this simply by adding the text 'where appropriate' or similar.

AECOM notes that there is no mention in the supporting text, the policy, or indeed in the Design Guidance itself, of the King's Somborne Conservation Policy (effectively, the Conservation Area Appraisal) that applies to the Conservation Area. This is a significant gap because without it, the Design Guidance, though useful, is quite generic, i.e. it could be applied to most places with a rural village character. Addressing this gap would help address Historic England's concerns with this policy. KSPC should also lobby TVBC for a timely update to the Conservation Policy, drafted in 1987 but still being used.

It is not clear how the Design Guidance's requirements were developed. The process of how it was informed by consultation needs to be clearly stated because it is quite prescriptive (with long lists of do's and don'ts) and currently it is not at all clear who decided what those rules should be or where they came from.

The policy requires applications to meet the 'guidelines' within the Design Guidance, but the document does not contain a section or heading called 'guidelines'. It would therefore be better reworded to state that 'applications will be tested against the Checklists in the Design Guidance'. Once the policy text has been changed to state that applications will be tested against the Checklists, the policy can be made significantly shorter and hence more powerful and effective, because all of 3 a) to j) could be deleted. Currently, including 3 a) to j) in the policy is confusing because this results in two different types/levels of Design Guidance requirements- those not cited in the policy and those that are.

If the recommendations of this EBPD, and appropriate feedback from Regulation 14 consultees, were applied to the Design Guide, it is considered that sufficient design evidence would exist to underpin this policy.

Part 2 a) of the policy overlaps with RLP Policy E1: High Quality Development in the Borough and thus can be deleted. Parts 3 a) and c) overlap with RLP Policy LHW4: Amenity and thus can be deleted. Any policy text on parking should at least reference RLP policy T2: Parking Standards and associated Annex G.

It is recommended that the supporting text paragraph on removal of permitted development rights, which is not (and should not be) carried through to the policy in any case, is deleted.

Policy name and number	KS3A Land off Froghole Lane
Summary of policy intent	<p>Land off Froghole Lane is allocated for 15 dwellings including affordable housing. Development must be directed to land within Flood Zone 1, incorporate measures to eliminate the risk of pollution entering the Somborne, be accompanied by a site-specific flood risk assessment, base flood risk management levels on current Environment Agency climate change guidance; wherever possible, floor levels should be situated a minimum of 300 mm above the 1 % annual probability peak flood level plus climate change flood level, determined as an outcome of the site-based FRA. The use of basements will not generally be supported. A SuDS scheme will be required, and priority should be given to use of infiltration drainage techniques. Vehicular access should be provided via Cow Drove Hill. The layout should incorporate the existing public right of way along Froghole Lane into the development and provide a new connection to the wider network to Cow Drove Hill to the east. The southern part of the site along the Somborne should be retained as informal open space, managed principally for biodiversity, as lowland meadow and flood risk mitigation with a management plan secured for its future care. Landscaping should be provided throughout including safeguarding the mature trees. The design should reflect its location in the Conservation Area, in particular retaining a sense of openness along the Somborne and connectivity of the village centre with the countryside beyond. Setting of listed buildings, in particular Fromans Farmhouse to the east should be protected. Contributions should be made towards providing a safer and attractive pedestrian crossing over the A3057. A schedule of investigative works should be undertaken in order to better understand the archaeology of the site.</p>
Evidence source and type	<p>Housing Need and Sites report (South Downs National Park)</p> <p>Landscape Assessment (South Downs National Park)</p> <p>Sustainability Appraisal and Strategic Environmental Assessment (South Downs National Park)</p> <p>Site Assessment Report (AECOM, 2021)</p>
Evidence analysis	<p>The AECOM Site Assessment conclusions should be considered to supersede the Sites element of the Housing Need and Sites report as it is more recent. They should also be considered to supersede the site-specific elements of the SA/SEA, and as such the SA/SEA can be updated as appropriate.</p> <p>Furthermore, in AECOM's Technical Review (Appendix 2 of this report) it is considered that the Landscape Assessment does not comprise robust evidence.</p> <p>Note, therefore, that the AECOM Site Assessment landscape conclusions should be considered to supersede those of the Landscape Assessment. However, as noted previously, the Site Assessment report is not a</p>

	landscape report in its own right and as such KSPC may consider that a replacement parish-specific landscape report is required.
Proportionality and gaps	<p>There is no need to require development to eliminate the risk of pollution entering the Somborne, as this is already covered by RLP Policies E7: Water Management and E8: Pollution; this requirement can be safely deleted. The requirement to safeguard mature trees appears to conflict with Policy KS/E7, which suggests replacing mature trees. This conflict could be resolved with appropriate wording changes to either this policy or KS/E7- if the former option, to state 'unless otherwise indicated' or similar, or in the latter option to align wording of KS3A on mature trees with the KS/E7 approach.</p> <p>There is no need to include text aimed at protecting the setting of listed buildings, as this repeats RLP Policy E9: Heritage.</p>
Effectiveness of policy	<p>The aim of traffic management on the A3057 was supported by HCC in its Regulation 14 response, and this means the policy is more likely to be effective in its aims.</p> <p>The need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.</p>
Conformity check	The policy appears in general conformity with RLP Policies COM15: Infrastructure, E6: Green Infrastructure, LHW1: Public Open Space, T1: Managing Movement and with national policy.
Conclusion and recommendations	The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the northern part of the site outside of Flood Zones 2 and 3 is potentially suitable for development and therefore allocation; however, this is subject to further investigation into the feasibility of access and mitigation of the identified constraints. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This aligns with the draft policy's aim to allocate fifteen homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be

progressed, with relevant modifications and subject to the further investigations recommended by the Site Assessment report, into the next iteration of the neighbourhood plan.

Policy name and number	KS5A Land at Spencer's Farm (South)
Summary of policy intent	Land at Spencer's Farm, adjacent to Muss Lane is allocated for at least 14 dwellings, including affordable housing, subject to the layout incorporating the existing public right of way into the development and opportunities taken to provide new or enhanced connections to the wider network. Landscaping must be provided throughout including safeguarding and supplementing the trees and hedging to the south-west and eastern boundary of the site which may provide suitable foraging and commuting routes for bats. Screening needs to be adequate all year round. The design should reflect its location adjacent to the Conservation Area, creating a transition from an urban to a more rural characteristic. The development should integrate with the adjoining residential area strongly characterised by post-war housing with gardens that wrap around, interspersed with more historic properties. The development should be kept below the 40m contour line and not be prominent in long distance views from the south. Ground investigations should be undertaken to identify the depth of groundwater. Based on up to date evidence of local habitats and species, undeveloped land should be managed with the aim of Improving biodiversity value and contributing to connecting habitats in the locality.
Evidence source and type	Housing Need and Sites report (South Downs National Park) Landscape Assessment (South Downs National Park) Sustainability Appraisal and Strategic Environmental Assessment (South Downs National Park) Site Assessment Report (AECOM, 2021)
Evidence analysis	The AECOM Site Assessment conclusions should be considered to supersede the Sites element of the Housing Need and Sites report as it is more recent. They should also be considered to supersede the site-specific elements of the SA/SEA, and as such the SA/SEA can be updated as appropriate. Furthermore, in AECOM's Technical Review (Appendix 2 of this report) it is considered that the Landscape Assessment does not comprise robust evidence. Note, therefore, that the AECOM Site Assessment landscape conclusions should be considered to supersede those of the Landscape Assessment. However, as noted previously, the Site Assessment report is not a landscape report in its own right and as such KSPC may consider that a replacement parish-specific landscape report is required.
Proportionality and gaps	The text 'including safeguarding and supplementing the trees and hedging to the south-west and eastern boundary of the site which may provide suitable foraging and commuting routes for bats' is not required because all such requirements repeat those of policy KS/E7.

Effectiveness of policy	The need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.
Conformity check	The policy appears in general conformity with RLP Policies COM15: Infrastructure, E6: Green Infrastructure and T1: Managing Movement.
Conclusion and recommendations	The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the site is potentially appropriate for allocation subject to the mitigation of identified constraints and confirmation of access. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This aligns with the draft policy's aim to allocate at least fourteen homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance, could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed, with relevant modifications and subject to the mitigation of identified constraints and confirmation of access recommended by the Site Assessment report, into the next iteration of the neighbourhood plan.

Policy name and number	KS6A Land adjacent to Cruck Cottage, Winchester Road
Summary of policy intent	<p>Land off Winchester Road adjacent to Cruck Cottage is allocated for 4 dwellings. Planning permission will be granted where the layout of the development puts the setting of Cruck Cottage (Grade II Listed) at its core including providing open space to the front of the site which has the dual purpose of keeping the development at most risk outside of the flood zone and providing a sense of space around the listed building. Development should be of a small scale, reflecting the small-scale nature of Cruck Cottage and avoiding urban paraphernalia and extensive areas of parking which would detract from the listed building. The mature trees along the southern boundary should be retained and safeguarded. The design should conserve and enhance the setting of local heritage assets including the Conservation Area and listed buildings and is consistent with the linear street pattern. Proposals for the site should be accompanied and informed by a site specific flood risk assessment that demonstrates that the development will be safe for its lifetime without increasing flood risk elsewhere, and, wherever possible, reducing flood risk overall. Development shall be directed to areas of the site at lowest risk of flooding. Flood risk management measures shall be incorporated based on current Environment Agency climate change guidance. Wherever possible, floor levels should be situated a minimum of 300 mm above the 1% annual probability peak flood level plus climate change flood level, determined as an outcome of the site-based FRA. The use of basements will not generally be supported. A SuDs scheme will be required, and priority should be given to use of infiltration drainage techniques.</p>
Evidence source and type	<p>Housing Need and Sites report (South Downs National Park)</p> <p>Landscape Assessment (South Downs National Park)</p> <p>Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) (South Downs National Park)</p> <p>Site Assessment Report (AECOM, 2021)</p>
Evidence analysis	<p>The AECOM Site Assessment conclusions should be considered to supersede the Sites element of the Housing Need and Sites report as it is more recent. They should also be considered to supersede the site-specific elements of the SA/SEA, and as such the SA/SEA can be updated as appropriate.</p> <p>Furthermore, in AECOM's Technical Review (Appendix 2 of this report) it is considered that the Landscape Assessment does not comprise robust evidence.</p> <p>Note, therefore, that the AECOM Site Assessment landscape conclusions should be considered to supersede those of the Landscape Assessment. However, as noted previously, the Site Assessment report is not a</p>

	landscape report in its own right and as such KSPC may consider that a replacement parish-specific landscape report is required.
Proportionality and gaps	<p>There is no need to include text aimed at protecting the setting of listed buildings, local heritage assets and the Conservation Area, as this all repeats RLP Policy E9: Heritage. Note also that the aim of avoiding extensive areas of parking may have potential to conflict with Policy KS/H8's requirement for sufficient off-road parking; this conflict can be resolved by amending the text of one or other of the policies so they do not appear too much at cross-purposes.</p> <p>The phrase 'urban paraphernalia' in the policy should be defined more clearly as it is not a recognised term in the planning system.</p>
Effectiveness of policy	The need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.
Conformity check	The policy appears in general conformity with RLP Policies COM15: Infrastructure, LHW1: Public Open Space and national policy.
Conclusion and recommendations	<p>The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the site is potentially appropriate for allocation subject to the mitigation of the identified constraints; however, only a limited number of homes could be accommodated because of these constraints. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 3-6 homes. This aligns with the draft policy's aim to allocate four homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore, it is considered that this policy could be progressed into the next iteration of the neighbourhood plan, with relevant modifications and subject to the mitigation of the identified constraints, bearing in mind that only a limited number of homes could be accommodated because of these constraints.</p> <p>The phrase 'urban paraphernalia' in the policy should be defined more clearly as it is not a recognised term in the planning system.</p>

Policy name and number	KS7A Land at Winchester Road and New Lane (South)
Summary of policy intent	<p>Land at Winchester Road and New Lane is allocated for seven dwellings. Planning permission will be granted where development is directed to land within Flood Zone One and where it incorporates measures to eliminate the risk of pollution entering the Somborne. The layout should incorporate the existing public right of way and opportunities are taken to provide new or enhanced connections to the wider network. Landscaping should be provided throughout including safeguarding and supplementing the trees and hedging bordering the site and the pond within it which may provide suitable foraging and commuting routes for bats. The design, density and layout should reflect its location adjacent to listed farm buildings and both its location within and adjoining the Conservation Area. Development will be limited to the eastern part of the site. The design and layout for the site would need to reflect that it is located at a key gateway into the village and should accentuate the rural nature of the location providing a gentle transition from built environment to rural. The development should be informed by an appropriate programme of archaeological work and should incorporate any features as appropriate into the design and layout of the scheme. The development should integrate with the dispersed nature of the adjoining residential buildings and should not be prominent in long distance views. Proposals for the site must be accompanied and informed by a site specific flood risk assessment that demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, wherever possible, reduce flood risk overall. Development shall be directed to areas of the site at lowest risk of flooding. Flood risk management measures shall be incorporated based on current Environment Agency climate change guidance. Wherever possible, floor levels should be situated a minimum of 300 mm above the 1% annual probability peak flood level plus climate change flood level, determined as an outcome of the site-based FRA. The use of basements will not generally be supported. A SuDs scheme will be required, and priority should be given to use of infiltration drainage techniques. Ground investigations should be undertaken to identify depth of groundwater. Based on up to date evidence of local habitats and species, undeveloped land will be managed with the aim of improving its biodiversity value, ensuring that it contributes to connecting habitats in the locality.</p>
Evidence source and type	<p>Housing Need and Sites report (South Downs National Park)</p> <p>Landscape Assessment (South Downs National Park)</p> <p>Site Assessment Report (AECOM, 2021)</p>
Evidence analysis	<p>The AECOM Site Assessment conclusions should be considered to supersede the Sites element of the Housing Need and Sites report as it is more recent. They should also be considered to supersede the site-specific elements of the SA/SEA, and as such the SA/SEA can be updated as appropriate.</p>

	<p>Furthermore, in AECOM's Technical Review (Appendix 2 of this report) it is considered that the Landscape Assessment does not comprise robust evidence.</p> <p>Note, therefore, that the AECOM Site Assessment landscape conclusions should be considered to supersede those of the Landscape Assessment. However, as noted previously, the Site Assessment report is not a landscape report in its own right and as such KSPC may consider that a replacement parish-specific landscape report is required.</p>
Proportionality and gaps	<p>Just as in policy KS3A, the requirement to safeguard mature trees appears to conflict with Policy KS/E7, which suggests replacing mature trees. This conflict could be resolved with appropriate wording changes to either this policy or KS/E7- if the former option, to state 'unless otherwise indicated' or similar, or in the latter option to align wording of KS3A on mature trees with the KS/E7 approach. Also, as in policy KS3A, there is no need to require development to eliminate the risk of pollution entering the Somborne, as this is already covered by RLP Policies E7: Water Management and E8: Pollution; this requirement can be safely deleted.</p> <p>There is no need to include text aimed at protecting the setting of listed farm buildings and the Conservation Area, as this repeats RLP Policy E9: Heritage.</p>
Effectiveness of policy	<p>The need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness.</p>
Conformity check	<p>The policy appears in general conformity with RLP Policies COM15: Infrastructure, E6: Green Infrastructure and T1: Managing Movement, and with national policy.</p>
Conclusion and recommendations	<p>The AECOM Site Assessment Report assigned this site a rating of 'amber', indicating the site is less sustainable or may be appropriate for development if certain issues can be resolved or constraints mitigated. Its detailed findings were that the northern part of the site is potentially partly suitable for allocation for limited development subject to avoiding areas of flood risk and creating a feasible access. An indicative estimate of the site's capacity for development based on 15-30 dwellings per hectare is 9-19 homes. This is an increased capacity compared with the draft policy's aim to allocate seven homes in this location. However, the need for a flood risk activity permit from the EA for works within eight metres of the river bank, and the design of any development within this area needing to be in line with their guidance could and should be added to the policy text itself- this will enhance effectiveness. The policy appears in conformity with relevant local and national policy. Taking all elements of the draft policy, the AECOM site assessment report conclusions, and the EBPD conclusions into account, therefore,</p>

it is considered that this policy could be progressed into the next iteration of the neighbourhood plan, with relevant modifications, and subject to the northern part of the site only being considered suitable for allocation for limited development that avoids areas of flood risk and entails a feasible access being created.

Appendix 2: AECOM technical review of South Downs Landscape Assessment

Introduction and Purpose

127. AECOM has been commissioned by King's Somborne Neighbourhood Plan Steering Group (the 'Steering Group') to undertake a Technical Review (the 'Review') of the report titled 'A Landscape Capacity Study of potential housing sites for the King's Somborne Neighbourhood Plan' (the 'LCS'), produced on behalf of the Steering Group by the South Downs National Park Consultancy Service (SDNPC).
128. This Review was completed by Chartered Landscape Architects at AECOM with experience in landscape assessment.
129. The purpose of this Review is to appraise the methodology and approach employed by the LCS to determine the landscape capacity of potential housing sites to receive development.

Sources of Information

130. The LCS states (p.4) that it is informed by the following technical guidance in respect of assessing landscape capacity.
- Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute, and Institute of Environmental Management & Assessment (2013) ('GLVIA3');
 - Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity (2002), The Countryside Agency and Scottish Natural Heritage; and
 - An Approach to Landscape Character Assessment (2014), Natural England and Christine Tudor
131. These sources of information are appropriate to the stated purpose of the LCS. The LCS omits the Landscape Institute Technical Information Note 'Townscape Character Assessment' (TIN 05/2017), which could be helpful to robustly justify conclusions in relation to evaluating townscape quality or value.
132. Natural England has recently (June 2019) published 'An approach to landscape sensitivity assessment – to inform spatial planning and land management'. It is acknowledged that this guidance has been released after the LCS; however, its approach, and examples (see Annex 2), are now relevant to consider.

Limitations and Assumptions

133. The limitations and assumptions identified are generally pertinent to the LCS.
134. The LCS notes that no specific [housing] layouts, densities, or designs were assessed. The scale of potential development is discussed in 1.22; however, Topic Paper 6, Figure 1b (p.5) recommends that when assessing

landscape capacity to accommodate specific type of change it is necessary to specify key aspects of the change / development type that are likely to have an impact on the landscape.

Assessing Landscape Sensitivity

135. Stage 1 of the LCS assesses the 'overall' sensitivity of each site, regardless of the type of change proposed. As noted above in 3.2, since the purpose of the LCS relates specifically to housing development, this stage is a departure from the recommendations set out in Topic Paper 6, and recent (2019) Natural England guidance. Similarly, when establishing landscape sensitivity through the process of landscape and visual impact assessment (LVIA) it is expected that consideration of the landscape 'susceptibility' to change is made with reference to specific development types, together with a judgement of landscape value. The evaluation of sensitivity should therefore consider the type of development proposed (i.e. housing), with judgements on capacity then considering which, if any, of the defined development scenarios set out in 1.22 would be acceptable for each site.
136. 'Historic Continuity' is considered separately to an appreciation of 'Landscape Elements'. Natural England (2014) 'An Approach to Landscape Character Assessment' explains that it is acceptable to use published Historic Landscape Character Assessments (HLCA) to inform, or be used alongside, an assessment of landscape character; however, it also notes that an appreciation of the existing landscape includes Cultural/Social (including 'time depth') processes. Since no specific HLCA is referenced by the LCS, it is unclear why these aspects have been considered separately. The LCS is also missing supporting evidence for its consideration of historic continuity, for example the map regression analysis.
137. The LCS considers visibility as a function of land cover and landform, informed by fieldwork survey from public locations. This approach is satisfactory, although limited evidence is provided to support these judgements, for example photographic records, or maps showing zones of theoretical visibility (ZTVs) that could be based on the development parameters set out in 1.22.
138. Matrix 2 combines landform and land cover to determine the level of visibility in the landscape. The combination of scoring in the matrix appears inconsistent with what would be expected in reality, and with the descriptions under 1.14. The terminology between the methodology and the assessment tables is also inconsistent, with the methodology referring to land cover and table 2 replacing this with Openness, views in and out. The approach to visibility is overcomplicated and adds to confusion in the evaluation process. While we agree that landform and land cover should be used to inform visibility, a simplified approach of considering and describing the extent of enclosure or openness would be clearer, supported by photographic evidence where relevant.
139. Matrix 3 combines judgements on Distinctiveness and Visibility to determine Overall Sensitivity. While the use of matrices is acceptable it can lead to oversimplification. For example, the combination of a 'Very Strong' Distinctiveness but 'Very Low' visibility results only in 'Moderate' sensitivity

overall; the same as an area of 'Weak' Distinctiveness and 'Moderate' visibility. There is some inconsistency between the matrix and categories of sensitivity described in 1.14.

Assessing Landscape Value

140. The approach to assessing landscape value follows accepted guidance (GLVIA3) and is considered appropriate to the aims of the LCS.

Indicative Landscape Capacity

141. Matrix 4 does not include the entire range of categories identified for Landscape Sensitivity presented in Matrix 3 and section 1.14. Matrix 3 includes five possible ratings: Very Low, Low, Moderate, High, and Very High, whereas matrix 4 only includes three ratings, omitting the Very Low and Very High ratings.

142. Different development scale scenarios are presented in 1.22 but are not considered individually in Table 3 'Capacity for Development'; thus, it is not clear whether the judgement of a 'Low' capacity is in relation to the small or large-scale development scenario.

143. The LCS employs 'Contribution to Settlement Pattern' as an additional category of scoring to influence the judgement of a site's capacity for development. 1.23 states:

'This [distinctive settlement pattern] is a significant determinant of local landscape character and it can either be positively or negatively affected through the location/siting of new development. As patterns of elements, including built form and settlements, are so critical in informing landscape character and therefore creating a strong sense of place – the contribution each site generates in terms of settlement pattern is also assessed.'

144. The LCS suggests that the settlement pattern is intrinsic to the landscape character and sense of place. It is unclear why this has been separated from Stages 1 and / or 2 of the Methodology which deals with defining the sensitivity of the landscape character (Historic Continuity and Landscape Elements). It may also effectively 'double count' the contribution of this characteristic as part of the overall scoring.

Summary

145. The LCS was independently tested through field survey, to confirm the validity of the findings. On this basis, the following recommendations should be considered:

- Reference should be made to the Landscape Institute Technical Information Note 'Townscape Character Assessment' (TIN 05/2017) and Natural England's 2019 guidance when considering the landscape / townscape character (and interactions between each);
- The methodology should clarify how HLCA has been used, and provide explanation of why Historic Continuity appears to be given greater weight in the judgement of Landscape Distinctiveness than other aspects of character;

- Landscape sensitivity should be considered in relation to the type of development proposed;
- Greater clarity and further evidence should be provided to support the judgements of landform, land cover and visibility;
- The scoring of matrices should be reviewed for consistency, and to ensure it aligns with the criteria descriptions;
- Consideration of the settlement pattern should form part of the judgement on landscape character sensitivity to avoid 'double counting';
- The LCS does not in the opinion of AECOM adequately explore the potential for mitigation measures for each site which may affect its capacity to accommodate development. For example, guidance on where development should be located within a given site, or what landscape elements / features present are characteristic / valued and should (where feasible) be retained;
- The LCS would benefit from a site-based spatial analysis of the findings, in the form of plans, ZTVs and photographs to describe the character baseline, analysis of value and sensitivity, and subsequently what is important to inform the design process for development of the type proposed.

Appendix 3: Relevant 'made' neighbourhood plan policies

Alongside the advice presented in this report, KSPC may find it helpful to refer to the following neighbourhood plans that have now been 'made' or adopted, and many of which AECOM advised as the neighbourhood planners developed their plans. All of the neighbourhood plans listed are available online. Site-specific policies have been excluded from this analysis as they are not comparable with site-specific policies elsewhere (given that every site and its planning context is different).

'Made' plan	neighbourhood	Relevant policy/policies	Corresponding King's Somborne policy
Birdham, West Sussex		Policy 4- Landscape Character and Important Views	KS/E1 Preserving Landscape Features, Views and Surrounding Farmland
Ansty, Staplefield and Brook Street, West Sussex		Policy AS2: Preventing Coalescence	KS/E2 Horsebridge to King's Somborne Local Gap
Bere Peninsula, Devon		Policy C2: Local Green Spaces	KS/E3 Local Green Space
Highgate, London Borough of Camden		Policy DH11: Archaeology	KS/E5 Archaeology
Bramley, Hampshire		Policy RE1: Reducing Flood Risk	KS/E6 Flooding and Water Management
Ascot, Sunninghill and Sunningdale		Policy NP/EN4- Biodiversity	KS/E7 Biodiversity
Bourton, Dorset		Policy 7: Protection of Habitats	KS/E8 The Somborne
Stradbroke, Suffolk		Policy STRAD4: Utilities Provision	KS/F2 Utilities
Hazelbury Bryan, Dorset		Policy HB15. Meeting Housing Needs- Amount and Location of New Dwellings	KS/H1 Quantity of New Homes Needed
Ashted, Surrey		Policy AS-H2: Balancing the Housing Mix	KS/H7 Housing Mix
Brereton, Cheshire		Policy HOU10 The Layout and Design of New Housing	KS/H8 Design

Appendix 4: Further guidance on neighbourhood planning policy

Further advice can be found in the following places:

- The full range of technical support packages available through Locality can be found at: <https://neighbourhoodplanning.org/about/technical-support/>
- Advice on writing planning policies is can be found by following the link below:
<https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>
- Advice on drafting Neighbourhood Development Orders and bringing forward community-led housing is available on the Locality website:
<https://neighbourhoodplanning.org/toolkits-and-guidance/neighbourhood-development-orders-community-right-build-orders/>

These best practice toolkits, together with a final health check, which is available free of charge, will aid KSPC in ensuring the Plan meets the Basic Conditions that enable a draft plan to proceed to referendum.

