

**Consultation Responses to Development Strategy and Site Selection 2022**

| Respondent number | Comment  | Officer comment  |
|-------------------|--|--|
| ANON-KSAR-NKGN-Y  | <p>I strongly disagree with the landscape character sensitivity, visual sensitivity and value assigned to sites CU14 and CU34.</p> <p>Landscape Character Sensitivity – with an increasing number of dwellings to the north and east and existing properties to the south, this site is becoming increasingly valued for its character (two commercial operations aside). It affords significant relief to nearby dwellings because it is now the only remaining environmental relief to nearby dwellings as all surrounding fields have been developed. It also makes a significant contribution to the distinctive character and identity of nearby settlements. As such, it could only accommodate limited change with some impact on landscape character.</p> <p>As such, the landscape character sensitivity of this site should be assessed as high – 4.</p> <p>Visual sensitivity – Any development on this site would result in substantial obstruction or complete destruction of the existing view from the residential properties to the north, west and particularly the south. This would result in the complete change in character and composition of the view and the introduction of elements uncharacteristic of a rural</p> | <p>The points have been considered but are not agreed and no changes to Landscape appraisal considered warranted in light of comments.</p> |

|                  |   |   |
|------------------|---|---|
|                  | <p>setting, particularly as the site sits at an elevation of 22m, above other locations in the vicinity (16m to east and south east, 19m to the west and 21m to the southwest and north). In addition, a public right of way (route 062/9/1 part 2b) passes close-by with views of the site.</p> <p>As such, the visual sensitivity of this site should be assessed as visual sensitivity score 5 – very high.</p> <p>Value – The sites are located close to a public right of way (route 062/9/1 part 2b) and separate the North Whiteley development from Curbridge to the west and Whiteley to the south.</p> <p>As such it offers increasingly strong rural character and should be assessed as value score 3 – medium.</p> <p>Overall Sensitivity – with the above in consideration, the overall sensitivity score should be assessed as high – 12, protection from development is the preferred option.</p> |   |
| ANON-KSAR-NK3F-3 | <p>The site selection of SW01 (previously SW07) is based on very inaccurate evidence which has not been corrected. If the Impact assessment was re-scored, it would become evident that this development is unsustainable. Insufficient attention has been given to the increase in carbon emissions which would result from such a development.</p> <p>Insufficient attention has been given to the very real threat to road safety, to pedestrians, cyclists, horse-riders which would result from such a development.</p>  | <p>The IIA does consider the need to travel to services in its assessment of this site and summarised on page 26 of the Background Paper.</p> <p>The initial high level transport review of this site by Hampshire Services is set out on pages 184 to 186 of Appendix 3 of the Background Paper. It scores the site as Amber for safety due to one slight collision nearby (on Downs Road) in the past 5 years, and notes “<i>Development of this site offers the potential to provide a</i></p> |

|                  |  |  |
|------------------|--|--|
|                  |  | <i>footway on the western side of Westhill Road North to link to existing footway on eastern side of the road. This could help to provide better linkages southwards into the village where the existing amenities are located". At present there is no evidence that the site cannot be developed in a safe manner, but this will be considered further as the plan progresses.</i> |
| ANON-KSAR-NKZH-C | <p>The Compton Down Society fully supports the exacting criteria by which all of the proposed sites within the Compton &amp; Shawford Parish have been assessed. We note that, other than the possible development of Bushfield Camp at the northern boundary of the parish, none of the other identified sites have been judged suitable for development. We concur.</p> <p>However, based on past experience, we are aware that the Local Plan does not preclude developers from submitting future schemes on any of the identified sites. For this reason we wish the Local Plan to stress why inadequate access, infrastructure and amenities and the character, environmental and traffic impact criteria has ruled out any of the sites being suitable for future development.</p> | It is not considered appropriate for the Plan to set out a blanket statement that non-allocated sites are not suitable for development, over and above the restrictive policies such as SP3. In any event, such as statement would not prevent planning applications being made should site promoters wish.  |
| ANON-KSAR-NKBT-Z | Yet another complicated drop-down with no guidance on which one to select.   | Noted.   |
| ANON-KSAR-NK61-H | No comment left  | Noted.   |
| ANON-KSAR-N85A-D | Please see our response to Policy BW4  | Representation s summarised and answered under the responses to Policy BW4.  |
| ANON-KSAR-N8UC-F | The Development Strategy and Site Selection 2022 paper does not identify any new allocations at Waltham Chase,   | It should be noted that site WC1 Morgans Yard is an existing allocation and had  |

|  |  |  |
|--|--|--|
|  | <p>which is reflected in the Regulation 18 Local Plan 2039 whereby the current, adopted Local Plan allocation at Morgan’s Yard is carried forward (WC1). This is on the basis that “There is a substantial amount of allocated land still to be developed. Therefore given the constraints around this location and it is not considered appropriate to allocate sites for further development at this time, given that the overall level of housing need can be met at other locations.” As set out elsewhere in these representations, it is considered that the level of housing need has been underestimated and there is a need for additional sites to be included for allocation. Accordingly, it is considered appropriate to consider which of the available sites should be considered for that purpose.</p> <p>Bargate Homes’ site at Land at Forest Farm, Waltham Chase (SH09) scored equivalent to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to meet the increased housing need identified elsewhere within these representations. Indeed, upon further scrutiny of the site assessment for SH09, it is clear that it’s scoring should be increased, such that it performs more favourably than WC1.</p> <p>While the IIIA is a useful tool as one part of the site selection process, to be effective, the objectives must consider a range of effects to be assessed through appropriate criteria. They should also provide sufficient differentiation so that alternatives can be considered.</p> <p>Bargate Homes object to the blanket approach applied to</p> | <p>gone through the process described in paragraph 5.1.</p> <p>Comments regarding the methodology and outcomes of the IIA of individual sites (including this one) are considered and responded to in that document IIA.</p> |
|--|--|--|

|                  |  |   |
|------------------|--|---|
|                  | <p>objectives IIA1 (climate change and mitigation), IIA2 (travel and air quality) and IIA7 (services and facilities) at Appendix F (November 2022) of the IIA. Although inter-related, by using the same assessment criteria for all three, the full range of issues affecting each objective are not considered. This also means that the results are the same across all three, making it harder to differentiate between sites. It is proposed that the criteria for each objective should be reviewed. This will provide a more justified and robust assessment which can be used to fully assess alternatives before allocating sites.</p> <p>In addition, of particular concern, the site has scored “significant negative” for IIA9 (biodiversity and geodiversity) and IIA12 (natural resources), but the outcome of the scoring criteria used by the Council do not appear to justify this.</p> <p>At present, the Council’s evidence base and its justification in the assessment of sites is somewhat lacking. It is therefore not currently possible to understand how the Council has arrived at its conclusions for each sustainability objective. The Council’s approach to assessing and allocating sites for development is currently not justified and is ultimately not sound, contrary to paragraph 35 of the NPPF, and therefore needs to be reviewed and supplemented by further evidence.</p> |   |
| ANON-KSAR-N81S-U | Please see our comments in respect of the Integrated Impact Assessment (IIA) as these overlap and relate to both the IIA and the Development Strategy and Site Selection.  | Comments regarding the methodology and outcomes of the IIA of individual sites (including this one) are considered and responded to in Appendix A of that document. |

|                  |  |   |
|------------------|--|---|
| ANON-KSAR-N89A-H | <p>The public consultation used in Colden Common to chose preferred development sites, was based on a popular vote. If you look at the results everyone has voted for sites that are not close to them. This has resulted in sites being chosen where there are currently a few residents rather than the most suitable / beneficial choice for the future residents.</p> <p>The weighting of all factors was also considered equal, so ignoring that some impacts are far more important than others. I mention this with 20+ years of advising central and local government on appropriate consultation and decision making processes, through an independent advisory company Catalyze Ltd.</p> | The comments are noted. Once the comments and / or site nominations had been received from Parish Councils, the site options were tested through the process set out in paragraph 5.7 before any proposed allocation was included in the emerging Plan.   |
| ANON-KSAR-NKJ4-8 | Appendix 3 of the 'Development Strategy and Site Selection' document sets out the initial assessment of the Sir John Moore Barracks. Within the assessment it is noted that the site does not contain any SINC's. However, this is at odds with the text within the draft Plan which states that the site encompasses the Flowerdown SINC. It is vital that the evidence base and the text within the draft Local Plan are consistent, otherwise Vistry Partnerships would call into validity the site selection evidence base.  | <p>The site as a whole incorporates the Flowerdown SINC though the draft Plan does make it clear that development should not have a negative impact upon the SINC.</p> <p><b>Proposed Response:</b></p> <p>Landscape appraisal on page 3 of Appendix 3 of the Background Paper to be updated to note presence of Flowerdown SINC.</p> |
| ANON-KSAR-N8GS-H | No comment left  | Noted.  |
| ANON-KSAR-N81U-W | Appendix 3 to the Development Strategy and Site Selection 2022 (Initial Technical Appraisals) 'contains the initial assessments to consider the landscape, heritage and transport implications of developing the sites proposed for development in the emerging Plan'. Accordingly, the  | The process undertaken in the shortlisting of sites and commissioning of initial assessments of the impacts that developing these sites could have is set out in paragraph 5.7 of the Background  |

|  |   |   |
|--|---|---|
|  | <p>Appendix only contains the assessments of KW02 (Land adjacent Cart and Horses Public House) and KW12 (Cornerways and Merrydale). However, this approach (i.e. including only those sites currently proposed for allocation) is prohibitive and lacks transparency as it does not allow for a comparison between those sites which are currently proposed for development and those which are not, at present. The Appendix goes on to the state that, 'it is anticipated that.....these initial assessments.....be further supplemented by additional information provided by site promoters and others to further inform the final development strategy, and refine the proposals for development'. If these are indeed initial assessments surely it is the case that all sites put forwards for allocation should have been appraised to inform which would be the preferred allocation. The publication of this Appendix without full details of all sites proposed does not allow for a full and transparent comparison at this consultation stage.</p> <p>Paragraph 038 of the NPPG states that Local Plan evidence 'needs to inform what is in the plan and shape its development rather than being collected retrospectively'. The Development Strategy and Site Selection paper (along with Appendix 3) is sub-titled as a 'Background Paper to inform the Local Plan 2039' and Appendix 3 to the Paper states that the appraisals contained within it 'have informed the selection of the sites for development, and the resulting planning policy as set out in the draft Local Plan document'. The Development Strategy and Site Selection paper is dated November 2022. The Regulation 18 consultation Local Plan is also dated November 2022 suggesting the allocations in the emerging plan, were informed by a</p> | <p>Paper. This is considered to be a proportionate approach in line with the NPPF.</p> <p>The <i>Development Strategy and Site Selection Background Paper</i> documents the process undertaken in arriving at the proposed allocations in the regulation 18 draft Local Plan. The document itself was finalised for publication in November 2022, but the process, including preparation of the SHELAA; Sustainability Appraisal of individual sites; engagement with Parish and Town Councils; commissioning and preparation on the initial appraisal of potential impacts of the development of sites on heritage, landscape and transport; and final decision; all took a significant amount of time prior to that with the outputs informing the production of the draft Plan.</p> <p>The criteria for how the appraisals of sites were undertaken for each of the Sustainability Criteria is set out in Appendix E of the IIA.</p> <p>Comments regarding the methodology and outcomes of the IIA of individual sites (including this one) are considered</p> |
|--|---|---|



|  |   |   |
|--|---|---|
|  | <p>document produced just days before the publication of the Regulation 18 Plan.</p> <p>- Kings Worthy:<br/>The Development Strategy and Site Selection 2022 paper assesses sites against 11 out of 14 objectives contained within the Integrated Impact Assessment. My client controls land at Springvale Road (site ref KW05) and so it is appropriate to consider that site in comparison to the two draft allocations (KW02 and KW12).<br/>My client's site scored equivalent to the two draft allocations in respect of the IIA Objectives 1 (climate change), 2 (reducing need to travel), 7 (access to services), 8 (economic growth), 9 (biodiversity and geodiversity), 11 (historic environment), and 14 (flood risk). As such, KW05 scored equivalent to the draft allocations on 7 out of the 11 criteria.<br/>In respect of the remaining 4 criteria; for Objective 4 (health and wellbeing) KW05 scored equivalent to KW12 with a minor positive effect whereas KW02 scored a 0 (negligible effect likely) meaning KW05 scored higher than one of the proposed allocations. This element of the assessment also fails to take into account that my client is able to offer land north of the field identified within the evidence base as public open space which has associated benefits as outlined in a letter recently submitted to the Council and included at Appendix A [included in full representation available on website].<br/>In terms of Objective 10 (landscape) KW05 scored equivalent to KW02 with a minor negative effect and KW12 scored a 0 (negligible effect likely). It is considered inappropriate to consider the effects of KW05 would be</p> | <p>and responded to in Appendix A of that document.</p> |
|--|---|---|



|  |  |  |
|--|--|--|
|  | <p>wholly negative in the context of the potential for the northern field to be converted to public open space (see Appendix A). That land is currently private land however, the allocation of the site would bring that land into public use with the associated benefits of opening the landscaping to local residents. The land rises away to the west, meaning that views across a wider vista would also be possible from the land. As such, it is considered more reasonable to score KW05 a +/- (mixed minor effects likely) in respect of Objective 10. At present, formal playing pitches are provided at Eversley Park Recreation Ground on the eastern side of Kings Worthy, south of Lovedon Lane, and informal public open space is also located on the eastern side of the village south of Lovedon Lane, adjacent to the A33. The provision of informal public open space on the western side of the village through the allocation of site KW05 will deliver an important new community facility which is accessible on foot to existing and future residents. KW05 scored equivalent to KW02 in relation to Objective 12 (efficient use of land) in being scored as having a 'significant negative effect' whereas KW12 is scored as having a minor negative effect. The rationale behind this scoring is questionable given the presence of the buildings on the two other proposed allocations (raising a question over why they weren't scored equivalently to each other) but also because KW05 has very limited use at present and could offer a viable option to provide a significant quantum of development on a very sustainable site.</p> <p>The scoring of the remaining criteria, objective 13 (water resource), is also questionable given – KW02 and KW05 scored equivalent to each other with an alleged 'significant negative effect' whereas KW12 was scored as having only a</p> |  |
|--|--|--|

|  |  |  |
|--|--|--|
|  | <p>'minor negative effect'. The assessment is based on drinking water quality. The rationale behind the differentiation between the sites in terms of water quality is unclear however, KW05 has full access to clean drinking water and in this regard it is no different to existing or other future residential development in Kings Worthy.</p> <p>Drawing this together, KW05 scored equivalent to KW02 and KW12 on 7 out of 11 criteria, or 63%. Of the remaining 4 criteria, KW05 scored higher than one of the proposed allocations on one of the objectives (obj 4), can reasonably be upgraded to score equivalent to the proposed allocations on the second (obj 10), third (obj 12), and fourth (13).</p> <p>In terms of other merits, the site is located within an enclave. The residential neighbourhood of Springvale lies immediately to the north of the site. Furthermore, residential neighbourhoods lie immediately to the east. The site is adjacent to and fronts onto Springvale Road which provides good connections to the commercial centre of Kings Worthy, including the school to the east. Whilst there are no footpaths on the site itself, there are a number in the immediate vicinity. There is good pedestrian and vehicular permeability with the settlement and as such, its location is inherently sustainable.</p> <p>The majority of the site lies within Flood Zone 1 being at low risk from flooding. As such, the development of the site for residential purposes is acceptable and accords with the provisions of the NPPF.</p> <p>A Preliminary Ecology Assessment has been carried out which has not identified any International or National sites of Ecological importance on the site. As part of the early-stage concept proposals, those areas with most ecological value</p> |  |
|--|--|--|

or potential have been excluded from the development parcel including the incorporation of appropriate buffers to offset development from those areas.

The site is framed by mature tree cover on the northern, western and southern boundaries associated with transport corridors, whilst residential neighbourhoods frame the site to the east. As a consequence, there is a strong sense of visual containment associated with the site.

Taking all of the above into account, it can be demonstrated that site KW05 is a high quality site, in a sustainable location capable of providing much needed housing in a settlement well positioned to accommodate housing numbers to contribute towards provision in Winchester as a key settlement but also within the District as a whole.

- Swanmore:

The Development Strategy and Site Selection 2022 paper does not identify a preferred allocation at Swanmore which is reflected in the Regulation 18 Local Plan 2039 whereby the current, adopted Local Plan allocation at The Lakes is carried forwards. This is on the basis that there are '..... Constraints around this location and the overall level of housing need can be met at other locations'. As set out elsewhere in these representations, it is considered that the level of housing need (both in the district and the adjoining PfSH area) has been underestimated and there is a need for additional sites to be included for allocation. Accordingly,

it is considered appropriate to consider which of the available sites should be considered for that purpose. My client controls land at Swanmore Road known as SWA10 in the Council's evidence base. The site scores equivalent to, or better than the other five sites considered in the assessment. It is however, considered that the site should score higher on a number of criteria. In the first instance, the site is just 224m from the recreation ground, 570m from Swanmore College, 352m from Swanmore Primary School, 340m from the local shop and 110m from a bus stop. By comparison, the other sites considered within the assessment are, on average, located further away from the key facilities within the village with SWA10 (Field Farm) scoring best on 3 out of 5 measures of sustainability as contained in the table below. It scores 2nd on one of the remaining two measures meaning that, on average, it scores highly from a sustainability point of view. Accordingly, it is entirely appropriate for SWA10 to score better on objective 1 (climate change) and 2 (reducing the need to travel).

Distance to Swanmore recreation ground (as crow flies)  
 Distance to Swanmore College (Secondary) (as crow flies)  
 Distance to Swanmore Primary School (as crow flies)  
 Distance to local shops (as crow flies) Distance to bus stop  
 (as crow flies)  
 Site ref.

SWA08 233m 332m 479m 500m 348m  
 SWA09 392m 110m 715m 662m 111m  
 SWA14 820m 792m 943m 920m 400m  
 SWA17 275m 415m 496m 539m 367m

|  |   |  |
|--|---|--|
|  | <p>SWA20 528m 690m 619m 703m 0m<br/> SWA10 (Field Farm) 224m 570m 352m 340m 70m</p> <p>On the basis of the assessment above, SWA10 can be considered to score well in respect of objectives IIA1 (climate change), IIA2 (reducing the need to travel), IIA4 (health and welling being), and IIA7 (access to services). The site is well located closer to existing services and facilities than other sites considered, meaning it could support the sustainable growth of the economy (IIA8) and has limited ecological value and is visually well contained (IIA9 and IIA10). It has no heritage constraints (IIA11), would be an efficient use of available land close to existing services (IIA12) and will have no negative impact on water resources or flood risk (IIA13 and IIA14). As such, should additional sites be considered necessary to accommodate additional dwellings, SWA10 is extremely well positioned to provide those additional numbers as an allocation within the emerging Plan.</p> <p>- Colden Common:<br/> The Development Strategy and Site Selection paper (2022) assesses 10 sites in Colden Common, three of which (CC02, CC04 and CC15) are proposed for allocation within the draft Plan. My client controls land at Tanglewood Equestrian Centre (CC07) which remains available for development. My client's site scores equal too, or better than, all three of the proposed allocations.<br/> The Development Strategy and Site Selection paper (2022) states that site CC07 is not suitable for allocation owing to Ancient Woodland and the associated high ecological implications. By comparison, in relation to the Ancient</p> |  |
|--|---|--|

|  |  |  |
|--|--|--|
|  | <p>Woodland and other Environmental Constraints, the Council's SHELAA assessment (which scores on a traffic light basis) scores the site as 'Green' suggesting there is a conflict between how the site was scored at SHELAA stage and how it is scored within the IIA.</p> <p>Interestingly, all four sites (CC02, CC04, CC07 (Tanglewood Equestrian Centre) and CC15) all scored equally in relation to IIA9 (biodiversity) despite the 'high ecological implications' of my client's site (CC07) being cited as the reason it was not selected for allocation.</p> <p>Furthermore, despite the Amber SHELAA scoring of site CC04 (now a proposed allocation at Main Road), it scores equal to the other two proposed allocations and my clients site in relation to IIA9 suggesting the Council consider that the impact on protected trees identified in the SHELAA assessment has no ecological implications for species using those trees.</p> |  |
|--|--|--|