

Summary of representations received by Basingstoke and Deane Borough Council made in relation to the Regulation 16 version of the Kingsclere Neighbourhood Plan pursuant to Paragraph 9 of Schedule 4B to the 1990 Act

Introduction

1. This document provides a summary of the issues and representations submitted in relation to the submission version (Regulation 16) of the Kingsclere Neighbourhood Plan (KNP).
2. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, Basingstoke and Deane Borough Council (BDBC) carried out a six week period of public consultation from Monday 29 January to Tuesday 13 March 2018 on the submission version of the KNP. The consultation documents included the submission version (Regulation 16) of the Plan, a Consultation Statement and a Basic Conditions Statement (which included an Equalities Impact Assessment) and other evidence base documents.
3. The representations submitted during the consultation period have been published on the borough council's website, and can be found by clicking on the following link - <http://basingstoke-consult.limehouse.co.uk/portal>. Paper copies of the representations can be viewed on request at Basingstoke and Deane Borough Council, Civic Offices, London Road, Basingstoke, RG21 4AH.
4. A total of 81 representations were received from 27 individuals, organisations and statutory consultees (excluding BDBC's comments on the KNP which are included in appendix 1). These can be summarised as:
 - Support: 19 representations made
 - Oppose: 36 representations made
 - Other (General comment/ no specific comment): 26 representations made
5. Set out below is a summary of the issues raised by consultees during the consultation. Appendix 1 of this document provides a summary of the representations made by specific consultees. The borough council's comments (which includes a summary within the covering letter) provided during the consultation can be viewed in full in Appendix 1.

Summary of issues raised by consultees

General:

6. Some general comments were made including:

- There is a High Voltage overhead powerline falling within the Local Planning Authority area boundary but it does not interact with any of the proposed development sites. Whilst there are no implications for intermediate/high pressure apparatus there may be Low / Medium pressure gas distribution pipes within the proposed development sites.
- The vision should set out what the community wish the Parish to be like at the end of the plan period. At present, it is not clear how the objectives have been derived to deliver a plan that responds to needs based on an assessment of environmental sensitivities, socio-economic needs or sustainability issues.
- The lack of no specific objective for conservation and enhancement of the historic environment is disappointing.
- Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance and should be recognised.
- SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and climate change. Wording suggested for inclusion in Neighbourhood Plan places responsibility on the developer for provision of surface water drainage.
- There is no direct reference within the KNP to the Hampshire Minerals and Waste Plan (2013) or the National Planning Policy for Waste. The KNP should make clear how it forms part of local planning policy, including conformity with policies within the adopted Hampshire Minerals and Waste Plan (2013).
- The KNP does not address concerns raised at the village meetings regarding infrastructure provisions in the village. There are only 20 places left at the school, with plans for new housing there are no plans to build new classrooms.

Section 3.5: Heritage

- Supports and welcomes detailed description of the conservation area and reference to local list in section 3.5.
- References to archaeological interest and the associated evidence base should be referenced in section 3.5
- Paragraph 3.5.8 should clarify the status of Grade II* buildings and reference all listed buildings both within and outside the conservation area.

Section 5.2: New Development

- The recognition of “a) Ensuring development is appropriate to the character of the village and the Village Design Statement” as a key issue in paragraph 5.2.4 is welcome.

Policy K1: Sites within the Settlement Policy Boundary

7. Concerns were raised with suggestions for improvement, in particular:

- The addition of reference to ALP Policy EM11 would be welcome.
- Policy K1 is restrictive and would not accord with basic condition a). It is suggested further policy should set out the circumstances upon which development adjacent to or outside the SPB would be supported. A restrictive SPB would preclude the delivery of otherwise sustainable development. The KNP should include a permissive SPB in support of development adjacent to the SPB.

Policy K2: Provision of Housing to Meet Local Needs

8. Support was given in relation to the prioritisation of households with a local connection when allocating affordable housing.
9. Concerns were raised in relation to the policy including:
 - The number of responses from the village questionnaire was not enough upon which to base the KNP. More responses should have been sought.
 - It is unknown how many households did not receive the housing questionnaire.
 - The requirement for all housing schemes to deliver 40% affordable housing is more restrictive than the ALP. This reference should be deleted and hence default back to ALP policy.
 - The policy provides no basis for the mix of housing required or clear direction on need in the KNP area. The policy should be clarified in order to comply with NPPG.

Policy K3: Housing for Older People

10. Concerns were raised with suggestions for improvement, in particular:
 - It is unclear to what extent applications need to 'address' the 'local housing need of elderly and infirm residents'. The policy needs clarifying in order to comply with the NPPG.
 - Reference to the Lifetime Home Standards should be removed from the final sentence of Policy K3. The Lifetime Home Standards have been replaced with Building Regulation requirements.
 - The requirement for all homes to accord with Part M of the Building Regulations is contrary to the NPPG. This requirement has no regard to viability and has the potential to frustrate development.

Policy K4: Good Quality Design

11. Support was given in relation to the policy including:
 - The Kingsclere Village Design Statement provides the required "understanding and evaluation of its defining characteristics", as stated in the NPPF.
 - The Policy is underpinned by a thorough understanding of the character and special qualities of the Plan area.

- Good design principles, landscape character objectives and the retention of important trees / woodland are supported.

Policy K6: Reinforcing Kingsclere's Landscape Character

12. Support was given for the policy, specifically criterion d) including suggestions for improvement:

- In bullet b) it needs to be more clearly defined what aspects of the views identified need to be protected.

Policy K7: Protecting Mature Trees and Hedgerows and Enhancing Rural Character

13. Support was given for the principle of seeking to retain important trees/woodland.

Policy K8: Support for Community Infrastructure Projects

14. Concerns were raised with suggestions for improvement, in particular:

- The A339 junction is a dangerous accident hotspot. The entire Kingsclere section of the A339 should be assessed due to safety concerns.
- The road layout needs changing at the A339 junction and the speed limit reducing to 40mph.
- The safety of the A339 junction should be paramount in the decision of where to put new housing.
- Cars block the A339 as they try to move into the turning lane but cannot exit safely.
- The junction could not cope with the extra capacity introduced by new homes.
- There is evidence of fatality and serious injury as a result of accidents at the A339 junction.

Policy K9: Infrastructure Readiness

15. Support was given alongside suggestions for improvement, in particular:

- Specific reference should be given to the need for developers to contact Thames Water as soon as possible to discuss infrastructure requirements.
- A key sustainability issue should be for development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.
- It is important to consider the net increase in water and wastewater demand to serve the development and also any impact the developments may have off site.
- The KNP should seek to ensure there is adequate water and wastewater infrastructure to serve all developments.
- It is important not to underestimate the time required to deliver necessary infrastructure.

Policy K12: Design of Local Shops, Pubs and Businesses in the Conservation Area

16. Support was given in relation to the policy as an important element of managing a key feature at risk from incremental change.

17. A concern was raised that the wording of Policy K12 needs amending in order to accord with Annex 2 of the NPPF.

Policy K13: Re-use of Agricultural and other Rural Buildings for Business Purposes

18. Support was given in relation to the policy and specifically criterion e).

19. Concerns were raised in relation to the policy including:

- Policy K13 does not meet the test of being in general compliance with Policy EP4 of the ALP.
- Where K13 only allows for the reuse of rural building, EP4 allows for extensions or replacements.
- Regarding traffic impact, K13 does not reflect the differentiation in EP4 between the impact of traffic on unclassified rural road and the SRN.
- Policy K13 needs amending to allow for the provision set out in Policy EP4.

Policy K14: Conserving and Enhancing Biodiversity

20. Concerns were raised that the policy makes no reference to the need to protect designated ecological sites beyond the Parish.

Paragraph 5.9.5

21. A concern has been raised that the paragraph fails to recognise the number of serious accidents that have occurred at the junction.

Policy K17: Parking

22. Support was given in relation to the policy as a clear a proportionate policy approach.

Policy K21: Heritage Assets

23. Support was given in relation to the policy and sub-section 5.11.

Policy K HA1: Allocation of Fawconer Road Site for at least 12 New Dwellings

24. Concerns were raised in relation to the policy including:

- Residents value the screening offered by the line of mixed hedging trees along the stream and request that these are retained.
- Trees protect the bank from erosion and provide food / cover for birds.

- TPOs are in place on a number of Oak trees on the site. These trees enhance the area and are environmentally useful.
- It will be almost impossible to cram 12 dwellings onto the small site
- The access onto Ashford Hill Road is inappropriate and will add further issues to the road. The development should not be allowed on access reasons alone.
- The site was previously rejected by BDBC, one of the reasons being proximity to the A330 junction.
- Other sites should be considered where the traffic is not such an issue.
- Given the proximity of the site to the A339, a requirement for air quality mitigation measures should be added into the policy.
- Criterion b) states access will be from 'Ashford Hill Road'. There is no Ashford Hill Road in proximity of this site. The plan needs updating to correct the road name to 'George Street'.
- Site constraints include ecology, landscape, surface water flood risk and noise – no satisfactory evidence has been provided to illustrate these constraints can be overcome.

25. Support was given with suggestions for improvement, in particular:

- The site can support at least 12 dwellings. The approach of setting a minimum figure is supported.
- Delivery of the dwellings within the plan period is achievable.
- The access appraisal confirms that safe access can be achieved from Ashford Hill Road.
- Site development can be achieved without an adverse impact on key species and habitats. Ecological survey recommendations will be incorporated into the scheme.
- Amend criteria c) to ensure consistency with Policy EM4 of the ALP.
- The Noise Impact Assessment confirms development can be provided on site that achieves acceptable noise standards. The A339 is not considered a barrier to development.
- Appropriate green infrastructure can be provided on and off-site.

Policy K HA2: Allocation of Coppice Road Site for at least 26 New Dwellings

26. Concerns were raised in relation to the policy including:

- The lay-by on the A339 adjacent to the allocation is often used at night by refrigerated lorries. The running noise may affect those living in the proposed new houses.
- It will be impossible to cram 26 dwellings, adequate parking and space between the houses on such a small site.
- Access onto Ashford Hill Road is inappropriate and will add further issues to the road. Development should not be allowed for access reasons alone.
- Noise levels due to the A339 are too high for houses within the proposed development.
- Other sites should be considered where traffic is not such an issue.
- Given the proximity of the A339, a requirement for air quality mitigation measures should be added into the policy.

- Criterion b) states access will be from 'Ashford Hill Road'. There is no Ashford Hill Road in proximity of this site. The plan need updating to correct the road name to 'George Street'.
- The quality and usability of public open space on the site is questionable due to the space being so narrow.
- Given the number of units proposed and the limited developable area, densities will be high, out of character with the surrounding area, and therefore not in accordance with Policy K4.
- Outstanding site constraints include ecology, TPOs, surface water flooding, southern water and water main which would need to be overcome. Relationship with existing built up area due to shape of site unlikely to be satisfactory.
- There is no evidence that the site is under option from a housebuilder. This could delay site delivery. Land at Porch Farm has an option agreement in place with Linden Ltd.
- To recognise correct 'mitigation hierarchy' and requirement for net gains, where possible, enshrined in the NPPF suggest criterion c) is reworded.

27. Support was given in relation to the policy including:

- The site development supports all five of the KNP objectives.
- The site will not result in the loss of any existing facilities and will enable the creation of public open space.
- Careful consideration has been given to ecology and an ecological management plan has been provided.
- The acoustic report demonstrates that suitable mitigation will ensure satisfactory noise levels.
- The illustrative layout and access appraisal identifies how a safe and suitable access can be obtained, taking the Fawconer Road site into account.
- A 20mph design speed and pedestrian and cycle access are likely to be configured within the layout.
- There are no medium / long distance views of the site from the surrounding landscape and AONB.
- Near distance views of the sites are experienced in the context of the A330 and existing residential built form. The site has greater affinity with the urban edge than the countryside.
- There is no visibility of the site from Kingsclere's conservation area or Listed Buildings. Heritage assets will be unaffected.
- The site is substantially influenced by the 20thC development beyond the historic core. These factors reduce the sensitivity of the site and limit its remoteness and tranquillity.
- Key landscape and visual considerations incorporated into the proposed development are; retentions and reinforcements of existing perimeter vegetation, setting back of built form from the edge of the site to safeguard adjacent properties and trees, the provision of open space and footpath links.
- The proposed development will partly compensate for the limited loss of open character. There are potential benefits for some features such as canopy trees.
- A road but no other development will go through the SINC. The SINC conservation management plans will improve the condition of the natural features long-term.

- The noise assessment demonstrates acceptable noise levels will be achieved for residents, subject to mitigation.

Policy K HA3: Allocation of Strokins Road Site for at least 14 New Dwellings

28. Support was given in relation to the policy including:

- The allocation of 14 dwellings is supported
- The site development supports all of the KNP objectives
- The site will not result in the loss of any existing facilities and will enable the creation of public open space.
- The acoustic report demonstrates that suitable mitigation will ensure satisfactory noise levels.
- The garages to the north of Strokins Road can be relocated away from the front of the site to provide an attractive entrance and positive discussions have been held with Sentinel who own the garages.
- A 20mph design speed and pedestrian and cycle access are likely to be configured within the layout.
- There are no medium / long distance views of the site from the surrounding landscape and AONB.
- Near distance views of the sites are experienced in the context of the A330 and existing residential built form. The site has greater affinity with the urban edge than the countryside.
- There is no visibility of the site from Kingsclere's conservation area or Listed Buildings. Heritage assets will be unaffected.
- Key landscape and visual considerations incorporated into the proposed development are; retentions and reinforcements of existing perimeter vegetation, setting back of built form from the edge of the site to safeguard adjacent properties and trees, the provision of open space and footpath links.
- The proposed development will partly compensate for the limited loss of open character. There are potential benefits for some features such as canopy trees.
- A road but no other development will go through the SINC. The SINC conservation management plans will improve the condition of the natural features long-term by providing compensation and enhancement.
- For consistency, the indicative access road should be included on the Strokins Road site plan.

29. Concerns were raised in relation to the policy including:

- Suggest indicative access road should be shown on the site plan
- It will be almost impossible to cram 14 dwellings, adequate parking and space between the houses on such a small site.
- Noise levels due to the A339 will be too high for houses within the proposed development.
- Other sites should be considered where traffic is not such an issue.
- The requirement for air quality mitigation measures should be added into the policy given the proximity of the A339.

- The location of housing at this site is uncharacteristic and squeezed into the open space currently a buffer to the A339 for existing properties. The policy is therefore contrary to Policy K4
- The presence of the SINC and buffer will further limit the developable area.
- Outstanding site constraints requiring further investigation include ecology, landscape and noise.
- It would be difficult to achieve a development which successfully integrates with the existing built up area due to the site's relationship with the residential properties on Stokins Road.
- There is no evidence of an agreement in place which would allow access to the site. This could delay the site coming forward.
- There is no evidence that the site is under option from a housebuilder. This could delay site delivery. Land and Porch Farm has an option agreement in place with Linden Ltd.

Overarching comments for Section 6 and Policies K HA1, K HA2 and K HA3:

30. Support was given alongside suggestions for improvement:

- The development of these sites is likely to increase traffic at the A339 junction. The A339 junction is an accident blackspot and source of congestion during peak hours. Developments should be conditional on junction improvement works being undertaken.
- The A339 has standing queues during peak hours and a high rate of serious accidents. To avoid making the junction more dangerous measures should be taken to reduce the hazard.
- Supplement policies K HA1 and K HA2 with a policy to demonstrate the safety of the junction is not compromised or that it is improved.
- A solution to the junction would be a roundabout. Supplement policies K HA1 and K HA2 with a policy to not preclude a roundabout of a size appropriate for the requirements of the junction.
- Thames water would welcome the opportunity to work with the LPA and developers to understand location and proposed timing of housing delivery to understand impacts and what upgrades may be required.
- Infrastructure concerns regarding wastewater infrastructure capability are unlikely on the allocated sites.

31. Concerns were raised in relation to the policies including:

- The potential impact on any archaeological remains on any of the proposed sites hasn't been fully assessed to ensure it can be demonstrated there would be no adverse impact.
- The deliverability of the sites is questionable and therefore the KNP may not meet the strategic policies of the ALP ('at least 50 dwellings').
- The sites chosen for allocation do not represent the most appropriate location for housing development.

- The site 'North of Gaily Mill' is deliverable, viable and achievable and would contribute towards sustainable development. It would be a more suitable option against the alternative assessed by the KNPG.
- Gaily Mill and Strokens road are the least constrained sites.
- A more robust approach would be to include a larger site i.e. Land at Yew Tree farm to prevent shortfall in five year housing supply.
- The proposed sites are too small.
- The other sites originally proposed would be a lot better suited to the need and wants of the village. They have been ignored.
- The proposed allocations are contrary to other neighbourhood plan policies K4, K6 and K7.
- Due to dangers at the A339 junction some residents drive a longer route to avoid the stressful experience. Safety aspects of the proposed access arrangements need to be considered.
- The A339 is noisy and unsafe and will be worsened by the increased traffic volumes as development comes forward. The site allocations need to be rethought.
- The allocation of a reserve site would 'safeguard' the future of the KNP and ensure flexibility and resilience. Different respondents suggested that different sites could form a reserve allocation. Sites promoted as a reserve site were Land at Porch Farm, Gaily Mill and Yew Tree Farm. It is short sighted to use small strips of land next to the busy road as opposed to land at Yew Tree Farm or Porch Farm where all 50 homes could be accommodated. Either alternative would allow expansion as more homes are required in the future.
- The three buffer strips were originally to maintain the rural look and feel of the village and hold a wealth of wildlife.
- The granting of planning permission behind Longcroft Road doesn't create a precedent for development.
- The developments will impact current residents with regard to vehicle access and building noise.
- Traffic problems on the A339 will be exacerbated.

Policy K HA4: Revision of the Settlement Policy Boundary

32. Concerns were raised with suggestions for improvement, in particular:

- The KNP needs to allocate more than three sites to prevent a shortfall in housing should one of the sites fail to come forward, and to safeguard against windfall applications.
- The ceiling on housing numbers should be removed to ensure accordance with the ALP.
- There are other more suitable sites available, suggested in the previous stage of the plan where the SPB is not subject to change and are a lot safer for traffic.
- The sites were meant to be protected as a noise barrier following a decision in the 1970's.

Strategic Environmental Assessment (SEA)

32. Concerns were raised in relation to the SEA including:

- Reassessment of Land at Yew Tree Farm is required for Land, Soil and Water resource impact is required. There is no evidence to suggest that housing on this site would have greater detrimental effect than the sites allocated in the KNP.
- Reassessment of the transport implications of development at Land at Yew Tree Farm is required. The negative transport implications are overstated.
- The SEA Environmental baseline has not been informed by the County Historic Environment Record. The baseline is inadequate to determine what, if any, impact the KNP will have on the historic environment. There is risk the plan does not promote sustainable development. The sites need reviewing in collaboration with County Council Archaeological Officers.
- The permit for Kingsclere residents to use Newtown Road household waste centre is under review, this is not reflected in the SEA.
- The SEA doesn't assess all of the possible options. The SEA does not consider all reasonable alternatives.
- The supporting evidence providing a basis for housing allocation is inconsistent and the criteria unfairly applied.
- The application of mitigation measures between the sites is inconsistent.
- Weighted scoring is subjective, it would be more appropriate to utilise a colouring system (similar to the ALP).
- The possibility of phased development on Gaily Mill is not properly considered.
- Land at Porch Farm has been scored unfairly with regards to biodiversity, climate change and historic environment and landscape. Alternative scoring and reasoning set out in representation.
- The SEA is not 'proportionate robust evidence' as required through the NPPF.

Site Assessment Report

33. Concerns were raised in relation to the Site Assessment Report including:

- Site allocations in the KNP fall within areas identified as key conservation enhancement priorities in the KNP. The Site Assessment Report does not address this constraint.
- The landscape assessment is incomplete and requires reassessment to ensure soundness.
- It is unclear as to whether an appraisal has been undertaken regarding potential constraints related to Archaeology and Ecology. The archaeological implications of the site allocations have not been given adequate consideration.
- Diverging conclusions on the suitability of the site between the 2014 site assessment and 2017 site assessment.
- Inconsistencies in the assessment of sites in terms of taking account of mitigation measures identified. Concerns about absolute nature of the scoring system which doesn't allow enhancements and improvements to be taken into account.
- Disagreement with the approach to site assessment on a weighted scoring basis, which is subjective.
- There are significant implications for the overall ranking when scoring inconsistencies are then weighted.

- Critique of sites assessment report submitted as part of representation demonstrates that the KNPG has overplayed many of the environmental issues for north of Gaily Mill site, and perhaps more significantly highlights that its preferred options, notably that of Fawconer Road and Coppice Road, are constrained in landscape and ecology terms. Gaily Mill and Stokins Road sites are actually the least constrained when compared to the other site options available.
- With regards to Land at Porch Farm, there are a number of scores disagreed with: Ease of creating/impact of vehicular access to site, landscape character and diversity, visibility from rights of way, effect of public open space/ability to create more, AONB, impact on biodiversity, physical constraints, affect or detract from listed/historical buildings.

Site Assessment Report Appendix 10

33. Concerns were raised with suggestions for improvement, in particular:

- Regarding proximity to local amenities, there should be consistency between the submission documents. In the KNP Yew Tree Farm is reported as 1350m from local amenities but is reported as 900m in the SEA therefore scoring differently in the measurements evidence. The measurements evidence states the nearest bus stop is 1008m but a bus stop within 380m has been overlooked.
- The potential for Yew Tree Farm development to overlook existing houses can be overcome. Overlooking does not make the site unsuitable.

Site Assessment Report Appendix 11

34. Concerns were raised with suggestions for improvement, in particular:

- Yew Tree Farm landscape assessment score of 1.9 is too low. The score should be revised upwards.
- Yew Tree Farm visibility score of 1.8 is too low. Mitigation measures can reduce any visual impact of the site. The site would form a natural extension of the existing SPB.
- Yew Tree Farm AONB visibility score of 1.1 is too low as site represents small area compared to AONB as a whole and is well related to existing SPB.

Site Assessment Report Appendix 12

35. A statement was made to confirm that Yew Tree Farm is available, suitable, achievable and deliverable in accordance with the NPPG. The development could be delivered within the first 5 years of the plan period.

Appendix 1 – Summary of representations made by consultees in relation to the submission version (Regulation 16) of the Kingsclere Neighbourhood Plan (NP) (excluding comments from Basingstoke and Deane Borough Council)

Please note that the representations below are a summary of the representations made. The full representations made by respondents can be viewed here <http://basingstoke-consult.limehouse.co.uk/portal>

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Amec Foster Wheeler on behalf of National Grid	-	-	General	-	Assessment carried out of electricity and gas transmission apparatus. Note that there is a high voltage overhead powerline falling within the Local Planning Authority boundary: YYM Route – 400kV from Bramley substation in Basingstoke and Deane to Melksham in Wiltshire Unitary Authority The overhead powerline does not interact with any of the proposed development sites. Whilst there are no implications for intermediate/high pressure apparatus, there may be Low Pressure / Medium Pressure Gas Distribution pipes present within proposed development sites.	-
Enborne Parish (Alan Croney)	-	-	General	-	Note that the Parish is some distance from Kingsclere so will not be providing a response.	-
Environment Agency (Jack Moeran)	-	-	General	-	Unable to review the consultation due to resourcing issues.	-
Frank Cheevers	KHA2	-	-	-	Notes that the lay-by on the A339 adjacent to the Coppice Road allocation is often used at night by lorries. The running noise from refrigerated lorries can be heard a couple of hundred yards away in South Road. Suggests that those living in the proposed new houses may find the stationary lorries very noisy.	-
Highways England (Beata Ginn)	-	-	General	-	No specific comments. General comment that they would be concerned with any proposals with the potential to impact the safe and efficient operation of the SRN (M3 motorway).	-

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Health and Safety Executive (HSE) (John Moran)	-	-	General	-	No specific comments. Confirm that the Kingsclere Neighbourhood Plan boundary does not encroach on the consultation zones for major hazard establishments. Don't need to be consulted on next stages.	-
Sian Robbins (NHS West Hampshire CCG)	-	-	General	-	State that the Kingsclere Neighbourhood Area is not within the West Hampshire CCG area. Request that the relevant CCG are consulted.	-
Thakeham (Damian Sullivan)	K HA1, K HA2, K HA3, K HA4	-	Section 6 – Housing Allocations	Oppose	Suggest that the KNP needs to allocate more than 3 no. sites to add flexibility and resilience to its housing delivery strategy. Request that the KNP allocates additional sites, or 'reserve' sites in order to prevent a shortfall in housing should one of the allocated sites fail to come forward. Suggest this would help to safeguard against 'windfall' applications. Note that the inspector examining the Local Plan recommended the removal of the ceilings on housing numbers for NPs (i.e. 'from approximately 50' to 'at least 50'). As the Local Plan includes this amendment it is suggested that a similar approach is taken for the KNP to ensure accordance with the Local Plan	Suggests additional allocation/(s) or reserve sites to ensure flexibility and resilience to housing delivery strategy.
Thakeham (Damian Sullivan)	-	-	Site Assessment Report Appendix 10 (Measurements Evidence) Proximity to local amenities and bus stop and potential to overlook/dominat e existing houses	Oppose	<u>Proximity to Local Amenities:</u> Suggest that regarding proximity to local amenities, there should be consistency between the submission documents. Note that Yew Tree Farm is reported as 1350m from local amenities in appendix 10 of the site assessment report, however in the SEA it is reported as 900m and therefore scored differently in the measurements evidence. <u>Proximity to bus stops:</u>	Request re-assessment of measurements evidence.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Note that the Measurements Evidence states that the nearest bus stop is situated 1088m west, however a bus stop, 'Sandford Springs', 380m away has been overlooked. Whilst it is recognised that this bus stop still fall >250m and would still fall into category 1 the choice of two bus stops should be given due weight. Suggest that the potential of the developed site to overlook existing houses due to site elevation differences can be overcome with appropriate remediation and mitigation measures. State that overlooking does not make the site unsuitable for housing.	
Thakeham (Damian Sullivan)			Site Assessment Report Appendix11 (Landscape Scores) Landscape character	Oppose	Consider the landscape assessment score of 1.9 too low considering the site lies adjacent to the SPB and will therefore not dominate the surrounding landscape. Note that Kingsclere hosts a range of local facilities which can support housing development at Yew Tree Farm. Recommend upward revision of the landscape character assessment score. Note that the BDBC Landscape Assessment (2001) identifies key conservation and enhancement priorities for Kingsclere: "conserve ribbon of scrub and tree planting between the A339 and urban form of Kingsclere, retaining and enhancing its landscape and biodiversity values". Note that the site allocations in the KNP fall within this area and the Site Assessment Report (2017) does not address this constraint. Consider the landscape assessment incomplete and requiring reassessment to ensure soundness.	Request upward revision of the landscape assessment score. Request re-assessment of the landscape assessment.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Thakeham (Damian Sullivan)	-	-	Site Assessment Report Appendix11 (Landscape Scores) Site Visibility	Oppose	Consider the visibility score of 1.8 too low and inappropriate given that there are no PRoWs crossing, or immediate to, the site. Note that mitigation measures such as a robust landscaping strategy and scheme can reduce any visual impact of the site. Question the extent to which views are being impaired at harmful levels considering the sites location adjacent to the SPB.	Request upward revision of the landscape assessment score.
Thakeham (Damian Sullivan)	-	-	Site Assessment Report Appendix11 (Landscape Scores) AONB	Oppose	Challenge the AONB visibility score of 1.1, Note that the entire site does not lie within the AONB, there is an area of AONB to the west set within the SPB giving partly urbanise character. Note that NPPF paragraph 115; 'great weight should be given to conserving their landscape and scenic beauty', does not preclude development from taking place on site. Suggest that the site would form a natural extension of the existing SPB, preserving natural beauty, especially considering the small site area in relation to the AONB as a whole.	Request upward revision of the landscape assessment score.
Thakeham (Damian Sullivan)	-	-	Site Assessment Report Appendix 12 (Updated Site Assessment)	Oppose	Confirm that Land at Yew Tree Farm is available, suitable, achievable and deliverable in accordance with NPPG. State that Thakeham has the record and capacity to deliver the development within the first 5 years of the plan period.	-
Thakeham (Damian Sullivan)	-	-	Strategic Environmental Assessment (Section 3.6.7)	Oppose	Biodiversity: State that other than the Impact Risk Zone of the Greenham and Crookham Commons SSSI there are no statutory designations on site.	Request re-assessment of Land at Yew Tree Farm for Land, Soil, Water resource impact. Request re-assessment of the transport implications.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					State that appropriate mitigation and avoidance measures can ensure that any biodiversity impacts will not be at harmful levels. State that the area of deciduous woodland comprising of a Biodiversity Action Plan Habitat, situated in the eastern part of the site, can be appropriately managed. Consider it inappropriate to assess the proposed development as having negative implications for biodiversity. Historic Environment and Landscape: State that comments made in respect to Appendix 11, landscape character also apply here. Land, Soil and Water Resources: Note that housing development does not pose a significant risk to groundwater. State that there is no evidence to suggest that housing on this site would have a greater detrimental effect on land/soil resources than the allocated sites in the KNP. Recommend that Land at Yew Tree farm is positively reassessed. Transport: Consider that the negative transport implications are overstated and the assessment so amended. Preferred sites: Whilst recognise that Yew Tree Farm is said to conflict with Spatial Strategy Option 2 'Delivery on small sites'.	

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					Consider a more robust approach would be to include a larger site, especially considering the forthcoming government standardised methodology for calculating housing need, to prevent a shortfall in five year housing supply.	
Barbara and Jonathan Smith	K HA1, K HA2, K HA3	-	Section 6 – Housing Allocations	Oppose	Consider it short sited to use small strips of land next to the busy road as opposed to the land offered at either Porch farm or Yew Tree farm, where all 50 homes could be accommodated. Suggest that either alternative site would allow expansion as more homes are required in years to come in addition to allowing smoother traffic flow on / off the A339. State that the 3 buffer strips were originally to maintain the rural look and feel of the village and hold a wealth of wildlife. State that the Parish Council agreement to 8 affordable homes behind Longcroft Road was not intended to set a precedent for development of the strips. Consider that the developments will impact on current residents in terms of vehicle access and building noise. Consider that the traffic problems both to and from the A339 will be exacerbated. State that they do not wish to have properties to the rear of their garden and that although traffic noise will be mitigated by the new homes, noise from the new homes will have a negative impact.	-
Historic England (Martin Small)	-	3.5	-	Support	Welcome the detailed description of the conservation area. Welcome reference to the local list.	-

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Historic England (Martin Small)	-	3.5	-	-	Note that there is little mention of archaeological interest in the parish. Asks for clarification that information has been gained from the Hampshire Historic Environment Record / Hampshire Historic Landscape Character Assessment.	Requests reference and consideration of Hampshire Historic Environment Record
Historic England (Martin Small)	-	3.5.8	-	-	Regarding paragraph 3.5.8, note that Grade II* buildings are particularly important buildings of more than special interest, not simply of local / regional interest. Suggests wording amended to reflect this. Request to know how many listed buildings are outside the conservation area and for more information to be included in line with the NPPG.	Requests importance of Grade II* buildings reflected and more information about listed buildings outside the conservation area.
Historic England (Martin Small)	-	-	Section 4 Vision and Objectives	Oppose	Suggest that to generate objectives for the plan and the policies to deliver them, the vision should set out what the community wish the parish to be like at the end of the plan period. Note that at present, it is not clear how the objectives have been derived to deliver a plan that responds to needs based on an assessment of environmental sensitivities, socio-economic needs or sustainability issues. Disappointed in the lack of no specific objective for conservation and enhancement of the historic environment. Note that this is surprising given the importance of historic character is highlighted in paragraph 5.1.3.	Specific objective for conservation and historic environment.
Historic England (Martin Small)	-	5.2.4	-	Support	Welcome the recognition of “a) Ensuring development is appropriate to the character of the village and the Village Design Statement” as a key issue.	-
Historic England (Martin Small)	K1	-	-	-	Would welcome the addition of reference to ALP Policy EM11 to criterion b) of Policy K1.	Addition of reference to ALP Policy EM11 to criterion b) of Policy K1

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Historic England (Martin Small)	K4	-	-	Support	Welcome Policy K4 and the Kingsclere Village Design Statement as providing the required “understanding and evaluation of its defining characteristics”, as stated in the NPPF. Welcome the underpinning of Policy K4 by a thorough understanding of the character and special qualities of the area covered by the Plan.	-
Historic England (Martin Small)	K6	-	-	Support	Welcome Policy K6, particularly criterion d). Recommend further consideration of bullet point b) to more clearly define what aspects of the views identified need to be protected. State that defining what the policy is intending to protect about these views will make it more effective and consistent as a development management tool.	Views to be protected need to be identified and defined.
Historic England (Martin Small)	K12	-	-	Support	Welcome and support Policy K12 as an important element of managing a key feature at risk from incremental change.	-
Historic England (Martin Small)	K13	-	criterion e)	Support	Welcome and support criterion e) of policy K13.	-
Historic England (Martin Small)	K17	-	-	Support	Support Policy K17 as a clear and proportionate policy approach.	-
Historic England (Martin Small)	Policy K21	5.11	-	Support	Welcome and support sub-section 5.11 and Policy K21. Grateful for the revisions made in response to Reg 14 stage comments.	-
Historic England (Martin Small)	-	-	Site Assessment Report	-	Unclear as to whether an appraisal has been undertaken regarding potential constraints related to Archaeology and Ecology. These concerns follow the note in the Site Assessment Report that these constraints were not evaluated at the coarse sieve stage but were identified as important for later appraisal stages.	-

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					Concerned that the archaeological implications of the site allocations have not been given adequate consideration.	
Historic England (Martin Small)	-	-	SEA	-	Note that the SEA Environmental baseline does not appear to have been informed by the County Historic Environment Record. Consider the SEA Environmental baseline is inadequate to determine what, if any, impact the plan will have on the historic environment. State that there is a risk that the Plan does not promote sustainable development. Suggest working with the County Council Archaeological Officers to review the sites assessed and identify issues and mitigation measures that should be secured through the allocation policy.	Work with the County Council to review the sites assessed regarding impact on the historic environment.
Historic England (Martin Small)	K HA1, K HA2, K HA3	-	Section 6 Housing Allocations	Oppose	Object to the allocation of the three sites until the potential impact on any archaeological remains on any of the proposed sites has been fully assessed and it demonstrated that the development of these sites would not adversely affect the significance of any remains.	Work with the County Council to review the sites assessed regarding impact on the historic environment.
Thames Water (Savills)	Policy K9	-	Section 5.7 Infrastructure	Support	Support section 5.7 in principle. Consider there should be specific reference to sewerage/wastewater infrastructure and the need for developers to contact Thames Water as soon as possible to discuss infrastructure requirements. State that a key sustainability objective should be for development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. State that it is important to consider the net increase in water and wastewater demand to serve the development and also any impact	Include text in section 5.7 encouraging developer engagement with Thames Water at the earliest opportunity.

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					that developments may have off site, further down the network. Suggest the KNP seeks to ensure there is adequate water and wastewater infrastructure to serve all new developments. Note that it is important not to under estimate the time required to deliver necessary infrastructure (Local network upgrades: 18 months, Sewage Treatment & Water Treatment Works upgrades: 3-5 years). Recommend that developers engage with Thames Water at the earliest opportunity regarding the need for sewage/wastewater treatment and network infrastructure; and surface water drainage requirements and flood risk. Suggest text encouraging the above should be included in the KNP.	
Thames Water (Savills)	-	-	SUDS	-	<u>SUDS:</u> State that limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. State that SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. Request that the following paragraph should be included in the Neighbourhood Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."	Include in the Neighbourhood Plan the following text: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."

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Thames Water (Savills)	K HA1, K HA2, K HA3	-	Section 6: Site Allocations	-	State that Thames Water would welcome the opportunity to work with the LPA and developers to understand location and proposed timing of housing delivery to understand what impacts it may have and if any upgrades are likely to be required. State that on the information available to date they do not envisage infrastructure concerns regarding wastewater infrastructure capability on the allocated sites.	-
Natural England (Rebecca Aziz)	-	-	General	-	No specific comments.	-
Miss Diana Tait	K HA1	-	-	-	Notes that Residents of no. 10, 12, 14 and 16 Fawconer Road value the screening offered by the line of mixed hedging trees along the stream and request that these are retained. Notes that the trees protect the bank from erosion and provide food / cover for a variety of birds. Notes that TPOs are in place on a number of Oak trees on the development site. Notes that these trees enhance the area and are environmentally useful.	-
Mrs Ann Brown	-	-	General	-	Suggests that the main road junction needs to be addressed. Suggests a roundabout would be the best solution to slow down the traffic on all roads. Requests that if traffic lights were to be installed, could they be part time, peak hours only.	-
Hampshire County Council	-	-	Minerals and Waste	-	Note that there is no direct reference within the KNP to the Hampshire Minerals and Waste Plan (2013).	Inclusion of text setting out how the KNP forms part of local policy, including conformity with policies

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					Acknowledge that there is a brief reference to the Basingstoke Development Plan in the Executive Summary. Suggest it would be beneficial if the KNP made clear how it forms part of local planning policy, including conformity with policies within the adopted Hampshire Minerals and Waste Plan (2013) Note that the closest household waste centre is on Newtown Road, Newbury provided by West Berkshire. The permit allowing Kingsclere residents to use these facilities has been extended but is under review. This arrangement is not referred to in the SEA, but the existing situation is outlined as the baseline situation.	within the adopted Hampshire and Mineral and Waste Plan.
Hampshire County Council	-	-	Section B7	-	Note that regarding the last bullet points, The Waste Management Plan for England is a high level document which provides an analysis of the current waste management situation in England. It is the National Planning Policy for Waste that is the relevant document setting out planning policy.	Correct the last bullet point in Section B7 to reflect the correct policy document.
Chris Bates	K HA1, K HA2, K HA3 & K HA4		Section 6 Housing Allocations	Support	Broadly support the KNP, and specifically policies HA1, HA2, HA3 and HA4 Suggests that development of these sites is likely to increase traffic at the B3051-A339 junction. Notes that the junction is an accident blackspot and source of congestion during peak hours. Suggests that the developments should be conditional on junction improvement works being undertaken (e.g. provision of a roundabout) to improve traffic flow and road safety.	Developments should be conditional on junction improvement works being undertaken

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Roger Best	-	5.9.5	-	-	Considers that the phrase “concerns regarding its safety have already been expressed”, fails to recognise the number of serious accidents that have occurred at the junction. Suggests that as a key interface with the proposed development plans, all aspects need to be considered despite responsibility lying with others. Requests that the paragraph is rephrased to recognise the number and severity of accidents that occur.	Rephrase 5.9.5 to recognise the number and severity of accidents that have occurred at the junction.
Roger Best	K HA1 & K HA2	-	-	-	Notes that the road identified has standing queues during peak hours with traffic leaving the main road, requiring potential residents to wait a long time to get out. Suggests that to avoid making the junction more dangerous, measures should be taken to reduce the hazard. Notes that the A339 / B3051 junction is very busy with long delays during peak hours and a high rate of serious accidents. Suggests that the solution is a roundabout and although this may require additional space from the proposed developments, the proposed developments should not preclude the construction of a roundabout, and hence force a reduced level of safety.	Add a Policy (supplementary to Policies K HA1 and K HA2) to demonstrate that the safety of the junction is not compromised or is improved. Add a Policy (supplementary to Policies K HA1 and K HA2) to not preclude a roundabout of a size and construction appropriate to the requirements of the A339/B3051 junction.
Barton Willmore (on behalf of The Guinness Family)	K HA2	-	-	Support	Support the allocation of Coppice Road site for approximately 26 dwellings. Consider the allocated sites development would support all five of the Plan objectives. It would provide new homes, including affordable homes and reflects the pattern of existing development and integrity of the village.	Suggest rewording of bullet c) to read: “Avoid, mitigate or as a last resort compensate for direct and indirect adverse impacts on key species and habitats, including the part of the site designated as Kingsclere Fen Meadow Remnants SINC, and provide net gains where possible.” To recognise correct

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					State that the site will not result in the loss of any existing facilities and will enable the creation of public open space. Careful consideration has been given to ecology and an ecological management plan has been provided. Access and connectivity: Note that the illustrative layout and supporting access appraisal identifies how a safe and suitable access can be obtained, taking into account the development proposals at Fawconer Road. Note that a 20mph design speed and pedestrian and cycle access are likely to be configured within the layout. Landscape and visual appraisal: Note that due to the fact that the site is low lying, surrounded by topographical variation, extensive tree belt and woodland blocks, there are no medium / long distance views of the site from the surrounding landscape including from the AONB to the south / south east and south west of the site. Note that near distance views of the site are experienced in the context of the existing residential built form and the A339, giving the site a greater affinity with the urban edge of Kingsclere than with the open countryside. Note that there is no visibility between the site and Kingsclere's conservation area or Listed Buildings. Heritage assets will be unaffected by the proposal. Note that regarding settlement character, the site is substantially influenced by the 20th	'mitigation hierarchy' and requirement for net gains, where possible, enshrined in the NPPF.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					century development which has spread beyond the historic core. Consider that these factors reduce the sensitivity of the site and limit its remoteness and tranquillity. Note key landscape and visual consideration incorporated into the proposed development are; retentions and reinforcements of existing perimeter vegetation, setting back built form from the edge of the site to safeguard the setting of adjacent residential properties and trees, the provision of open space and footpath links. State that the proposed development will partly compensate for the limited loss of open character. Note that there are potential benefits for a number of features, including canopy trees. Ecology: Note that a road would have to go through a small area of the SINC in order to gain access. No other development is proposed in the SINC. Propose road passes through area of willow scrub avoiding rush pasture/fen meadow. Conservation management plans proposed for the SINC would improve the condition of the natural features in the long-term through compensation and enhancement. To recognise correct 'mitigation hierarchy' and requirement for net gains, where possible, enshrined in the NPPF suggest criterion c) is reworded. Noise assessment: State that the noise assessment demonstrates that acceptable external and internal noise levels will be achieved for residents subject to noise mitigation. Note that the layout of the site	

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					has been designed to achieve lower noise levels.	
Barton Willmore (on behalf of The Guinness Family)	K HA3	-	-	Support	Support the allocation of Strokens Road for approximately 14 dwellings. Consider the allocated sites development would support all five of the Plan objectives. It would provide new homes, including affordable homes and reflects the pattern of existing development and integrity of the village. State that the site will not result in the loss of any existing facilities and will enable the creation of public open space. Access and connectivity: Note that the garages to the north of Strokens Road can be relocated away from the front of the site to provide an attractive entrance to the development. Positive discussions with Sentinel who own the garages. Note that a 20mph design speed and pedestrian and cycle access are likely to be configured within the layout. Suggest that indicative access road should be shown on site plan. Landscape: Note that due to the fact that the site is low lying, surrounded by topographical variation, extensive tree belt and woodland blocks, there are no medium / long distance views of the site from the surrounding landscape including from the AONB to the south / south east and south west of the site. Note that near distance views of the site are experienced in the context of the existing residential built form and the A339, giving the	Request that, for consistency, the indicative access road (as shown on the Illustrative Layout) should be included on the Strokens Road Site Plan.

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					site a greater affinity with the urban edge of Kingsclere than with the open countryside. Note that there is no visibility between the site and Kingsclere's conservation area or Listed Buildings. Heritage assets will be unaffected by the proposal. Note that key landscape and visual considerations incorporated into the proposed development are; retentions and reinforcements of existing perimeter vegetation, setting back built form from the edge of the site to safeguard the setting of adjacent residential properties and trees and the provision of open space and footpath links. State that the proposed development will partly compensate for the limited loss of open character. Note that there are potential benefits for a number of features, including canopy trees. Ecology: Note that a road would run adjacent to the SINC in order to gain access. No other development is proposed in the SINC. Key features of the SINC would be avoided by the access road passing through the improved grassland part of the SINC. Note that conservation management plans proposed for the SINC would improve the condition of the natural features long-term providing for compensation and enhancement. Noise assessment: State that the noise assessment demonstrates that acceptable external and internal noise levels will be achieved for residents subject to noise mitigation. Note that the layout of the site	

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					has been designed to achieve lower noise levels.	
Barton Willmore (on behalf of The Guinness Family)	K2	-	-	Support	Support Policy K2. Support the delivery of new affordable homes prioritised for households with a local connection to the parish of Kingsclere.	-
Barton Willmore (on behalf of The Guinness Family)	K4	-	-	Support	Support Policy K4.	-
Barton Willmore (on behalf of The Guinness Family)	K6	-	-	Support	Support landscape character objectives set out in Policy K6.	-
Barton Willmore (on behalf of The Guinness Family)	K7	-	-	Support	Support the principle of seeking to retain important trees / woodland as detailed in Policy K7.	-
Barton Willmore (on behalf of The Guinness Family)	K14	-	-	-	Note that Policy K14 makes no reference to the need to protect designated ecological sites beyond the Parish, although a description of sites with the potential to be affected is included in Section 4 and within the SEA.	Suggest amendment to be made to Policy K14 to read "Development proposals will only be permitted if significant harm to designated ecological sites, local biodiversity and/or geodiversity resulting from development can be avoided, mitigated or if that is not possible adequately compensated."
Rebecca Kitch	K HA1, K HA2, K HA3 & K HA4	-	Section 6 Housing Allocations	Oppose	Considers housing allocations to be contrary to Policy K4. Considers that cramming houses in the small space available on the allocated sites would not be "sensitive or sympathetic to the community and its heritage".	-

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					Considers that all the biodiversity would be lost, more than 2 storey houses would not be sympathetic to the people and buildings already along Fawconer, Coppice and Strokins Road and with such small plots, car parking would be a huge issue and unless properly addressed. Considers that there should be no 3 storey town houses. Would like to see plans where there is space to keep as much biodiversity as possible. Fear that this cannot be done on such a small plot. Considers that the houses need to have driveways built to provide sufficient parking space. Fear that this cannot be done on such a small plot. Allocations are contrary to Policy K6 as considers that building anywhere in Kingsclere would affect the landscape and character. Suggests that if built at the Porch Farm site, the effect could be lessened with screening or buffers. Considers that this option would not be available over the three small sites. Considers that building on the allocated sites is contrary to Policy K7 due to the removal of trees. Suggests the larger Porch Farm site would benefit from residential development as green spaces, trees and woodland sites could be added to the area instead of it just being an empty field.	
Rebecca Kitch	K8	-	-	-	States that the A339 Junction is a dangerous accident hotspot.	-

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					Considers it necessary for the entire Kingsclere section of the A339 to be assessed due to safety concerns. Considers that the road layout needs changing at the Ashford Hill road junction and the speed limit reducing to 40mph.	
Neil Kitch		Section 2.2	-	-	Regarding the statement that residents had been sent a questionnaire to ask for their opinions on housing, their property did not receive the document and could therefore not give their opinions. Questions how many other households may not have received the housing questionnaire that was not delivered to their address.	-
Neil Kitch	K2	5.3.2	-	Oppose	Considers 78 responses to the housing need questionnaire not an appropriate level of responses upon which a village plan should be based. Suggests more responses should have been sought before drawing conclusions.	-
Neil Kitch	K HA1, K HA2, K HA3 & K HA4	Section 6 Housing Allocations	-	Oppose	Note that Policy K7 sets out that the plan should take into account the impact of any potential development on the trees in the village. Considers that by building on the sites allocated in the plan there will be impact on many trees, especially on the land at Fawconer Road. Notes that there are many trees that shelter noise from the A339 from the residents and to remove these trees would go against Policy K7. States that other sites should be considered where there is less environmental impact and where the traffic is not such an issue	-

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					Considers the housing sites proposed to be too small and notes the previous unwillingness of developers to build three small developments as opposed to one site. Mentions the decision in the 1970's to keep the land upon which the sites are allocated as a natural noise barrier from the road and the village. Raises concern towards the fact that this was supposed to be protected. Considers other sites that were originally proposed would be a lot better suited to the needs and wants of the village, but considers they seem to have been ignored. Considers the A339 traffic issues have been ignored by the planning committee. Reiterates the danger of the junction and the fact this is visible from a simple Google search.	
Neil Kitch	K8	-	-	-	Considers that the safety of the A339 / Ashford Hill Road junction should be paramount. Notes that cars block the A339 as they try to move into the turning lane but cannot then exit safely. Considers that the junction could not cope with the extra capacity introduced by the increase in housing on this busy road. States that there is evidence of fatality and serious injury occurring as a result of accidents at the junction.	-
Neil Kitch	K HA1	-	-	Oppose	Considers it will be almost impossible to cram 12 dwellings onto such a small site. Considers that the access onto Ashford Hill Road is inappropriate and will add further issues to the already unsuitable stretch of road.	-

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					Considers that the development should not be allowed for access reasons alone. Notes that the site was previously rejected by a BDBC Officer, one of the rejection reasons being that the site would be too close to the A339 junction. Considers noise levels due to the busy A339 too high for houses within the proposed development. Suggests that other sites should be considered where the traffic is not such an issue.	
Neil Kitch	K HA2	-	-	Oppose	Considers it will be almost impossible to cram 26 dwellings, adequate parking and space between the houses on such a small site. Considers that the access onto Ashford Hill Road is inappropriate and will add further issues to the already unsuitable stretch of road. Considers that the development should not be allowed for access reasons alone. Considers noise levels due to the busy A339 too high for houses within the proposed development. Suggests other sites should be considered where the traffic is not such an issue.	-
Neil Kitch	K HA3	-	-	Oppose	Considers it will be almost impossible to cram 14 dwellings, adequate parking and space between the houses on such a small site. Considers noise levels due to the busy A339 too high for houses within the proposed development.	-

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					Other sites should be considered where the traffic is not such an issue.	
Neil Kitch	K HA4	-	-	Oppose	States that it seems like the SPB is being changed just to accommodate the unsuitable sites. Suggests that other sites should be considered where the SPB is not subject to change and suggests other more suitable sites are available.	-
Neil Kitch	-	-	General	Oppose	Notes that the KNP does not address concerns raised at the village meeting regarding provisions in the village. Reiterates the reference in the KNP to the fact there are only 20 places left at the village school. Considers that in a few years these places will be gone with the new housing developments. Notes there are no plans to build new classrooms. Raises the concern that residents will have to fight for places at their school.	-
Amanda Keable	-	-	General	Support	States that they are not opposed to the plan or location of new housing. Raises concerns about the impact of two additional junctions in close proximity to the dangerous A339/B3051 crossroads. Notes that crashmap.co.uk lists injuries at the junction and adds that the figure is higher than this as some accidents are not reported. Notes that due to the danger at the A339 / B3051 junction some residents drive a longer route via Longcroft Road end roundabout to avoid the stressful experience.	Request that the road safety aspects of the proposed allocations access arrangements are taken into consideration

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					Suggests that the imminent Sandford and Manydown developments will increase thoroughfare along the A339, exacerbating the dangers at this junction. Request that the road safety aspects of the proposed access arrangements are taken into consideration for the sake of current and future users of the junction.	
Gladman (Richard Agnew)	K1	-	-	Oppose	Consider that, without a further policy setting out the circumstances upon which development adjacent to or outside the SPB would be supported, Policy K1 is restrictive and would not accord with basic condition (a) set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). Consider that as the strategic policy in the ALP sets the housing target for Kingsclere as a minimum, KNP should include a permissive SPB which would support development adjacent to the SPB. Do not consider the use of a restrictive SPB an effective response to future development proposals. Suggest that it would act to preclude the delivery of otherwise sustainable development opportunities.	Inclusion of additional policy setting out the circumstances when development would be supported adjacent or outside to of the SPB.
Gladman (Richard Agnew)	K2	-	-	Oppose	Consider the requirement for all housing schemes to deliver 40% affordable housing, more restrictive than the ALP policy (5 or more dwellings). Consider the setting of affordable housing targets to be a strategic issue best dealt with by a Local Plan, supported by a viability study. Suggest this element of the policy is deleted.	Delete element regarding affordable housing provision and allow policy to default back to the ALP requirements.

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Turley (on behalf of Middleton & Portway Estates / Wades Estate Trust)	K HA1, K HA2 and K HA3	Section 6 Housing Allocations	-	Oppose	Supports identification that Kingsclere should accommodate growth over the plan period (as per the ALP). Questions the deliverability of the proposed site allocations and therefore doubt the consistency of the KNP meeting the strategic policies of the ALP in seeking to provide 'at least 50 dwellings'. This risks undermining the borough council's strategy to meet housing needs. Consider that the sites chosen for allocation do not represent the most appropriate location for housing development. Proposed housing allocation sites are highly constrained with likely implications for deliverability or at the very least reduced capacity. The KNP should identify further allocations at other sites to provide the necessary flexibility to accommodate housing requirements of Kingsclere and the wider District up to 2029, and to ensure consistency with the strategic policies of the BDLP and national policy. Promotes site 'North of Gaily Mill' confirming it to be deliverable, viable and achievable and would contribute towards sustainable development. Note that there are no overriding constraints to the delivery of Gaily Mill and consider it a more suitable option for development against the alternatives assessed by the KNPG. Consider Gaily Mill and Strokens Road to be the least constrained sites in comparison to the other site options.	Neighbourhood plan should identify a reserve site. Promoters suggest land 'North of Gaily Mill'.
Turley (on behalf of Middleton & Portway)	K HA1	-	-	Oppose	Notes outstanding site constraints include ecology, landscape, surface water flood risk and noise. Satisfactory evidence hasn't been provided to demonstrate how they can be	-

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Estates / Wades Estate Trust)					overcome. Mitigation is likely to limit the overall developable area and capacity of the site. Suggest that the site does not represent the most appropriate and sustainable allocations for meeting the Local Plan housing requirements of Kingsclere.	
Turley (on behalf of Middleton & Portway Estates / Wades Estate Trust)	K HA2	-	-	Oppose	Notes outstanding site constraints include ecology, TPOs, surface water flooding, southern water and water main which would need to be overcome. Relationship with existing built up area due to shape of site unlikely to be satisfactory. Suggest that the site does not represent the most appropriate and sustainable allocations for meeting the Local Plan housing requirements of Kingsclere.	-
Turley (on behalf of Middleton & Portway Estates / Wades Estate Trust)	K HA3	-	-	Oppose	Notes outstanding site constraints requiring further investigation include ecology, landscape and noise. Suggests it would be difficult to achieve a development which successfully integrates with the existing built up area due to the site's relationship with the residential properties on Strokens Road. Notes Site Assessment Report (in paragraph 5.10.6) states that the developer of Strokens Road considers the capacity to be 12 dwellings, yet the site has been allocated for 14. This suggests that the delivery of 14 units highly unlikely. Suggest that the site does not represent the most appropriate and sustainable allocations for meeting the Local Plan housing requirements of Kingsclere.	-

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Turley (on behalf of Middleton & Portway Estates / Wades Estate Trust)	-	-	SEA	Oppose	Suggest that the SEA does not consider all reasonable alternatives due to the approach to deriving options. State that the SEA does not properly consider the possibility of phased development being brought forward on the north of Gaily Mill site (if it were to be allocated as a reserve site) under option 1. Options 2 is flawed as it assesses potential housing allocations in relation to the capacity of the site as a primary factor not on the basis of bringing forward the most suitable sites for development. Consider the supporting evidence providing the basis for the allocation of housing sites (SEA and Site Assessment Report) is inconsistent and the assessment criteria unfairly applied. Discrepancies are set out in full in representation. Consider application of mitigation measures within the SEA inconsistent between the sites assessed for allocation. Notes overall, the assessment of the two options relative to the spatial strategy of the KNP is flawed, as it does not consider all potential alternatives. The context of the assessment is too narrow as it excludes within its analysis the possibility of several of the sites (including the north of Gaily Mill site) coming forward as housing allocations.	-
Turley (on behalf of Middleton & Portway Estates /	-	-	Site Assessment Report	Oppose	Diverging conclusions on the suitability of the site between the 2014 site assessment and 2017 site assessment.	-

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Wades Estate Trust)					Critique of site assessment report submitted to support representation. Critique of sites assessment report demonstrates that the KNPG has overplayed many of the environmental issues for north of Gaily Mill site, and perhaps more significantly highlights that its preferred options, notably that of Fawconer Road and Coppice Road, are constrained in landscape and ecology terms. Gaily Mill and Strokings Road sites are actually the least constrained when compared to the other site options available. Notes inconsistencies in the assessment of sites in terms of taking account of mitigation measures identified. Contend that appropriate mitigation measures could equally be put in place for the Gaily Mill site as for the proposed housing allocation sites. Fundamentally disagree with the approach to site assessment on a weighted scoring basis, which is subjective. Following discrepancies in sites assessment scoring identified: Unclear why access for allocated sites scores are high when accesses must pass through SINCs. Unclear why Gaily Mill scores 1 for impact on biodiversity where there are no designated habitats within the vicinity. The three sites proposed for allocation have been scored 5 in terms of flooding potential, which is not consistent with evidence in the SEA as there are areas at risk of surface water flooding.	

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					The three sites proposed for allocation have been scored 5 in terms of agricultural land classification while Gaily Mill has been scored 2. This is not consistent with the map for the London and South East Region,3 produced by Natural England, which confirms that the whole of the Kingsclere area is classed as grade 3 agricultural land. There are implications for the overall ranking when scoring inconsistencies are then weighted.	
Barton Willmore (on behalf of David Wilson Homes)	K HA1	-	-	Support	Confirm that the site can accommodate at least 12 dwellings and support the approach of setting a minimum figure for development. Note that David Wilson Homes has advised KNPG that delivery of dwellings within the plan period is achievable. Note that an access appraisal has been submitted to confirm safe access can be achieved from Ashford Hill Road. Consider that site development can be achieved without an adverse impact on key species and habitats. Note that ecological surveys have been commissioned, following which any recommendations will be incorporated into the scheme. Suggest amendments to criteria c) to ensure consistency with Policy EM4 of the ALP. Note that the Noise Impact Assessment confirms development can be provided on the Site that achieves acceptable noise standards both internally and externally with suitable mitigation. Note that consequently, the A339 is not considered a barrier to development.	Amend criteria c) as follows: <i>Avoid or mitigate direct and indirect adverse impacts on key species and habitats, including the deciduous woodland designated as Biodiversity Action Plan Priority Habitat, by mitigating ~~and/or compensating~~ any adverse impacts to ensure a net gain in biodiversity.</i>

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Note that appropriate green infrastructure can be provided on and off-site. Consider that overall, with the amendment to criteria 'c' Policy H KA1 is in accordance with the development plan and meets the 'Basic Conditions'.	
Pro-Vision (on behalf of Greenham Trust)	-	-	General	Support	Generally support the KNP.	-
Pro-Vision (on behalf of Greenham Trust)	K13	-	-	Oppose	Consider that K13 does not meet the test of being in general compliance with Policy EP4 of the ALP. Note that where K13 only allows for the reuse of rural buildings. Policy EP4 allows for extensions or replacement buildings in support of the rural economy. Also considers that, regarding traffic impact, Policy K13 does not reflect the differentiation in Policy EP4 between the impact of traffic on unclassified rural roads and the SRN. Suggest Policy K13 is amended to allow for the provisions set out in Policy EP4.	Reword Policy K13 title as follows: ~~Re-use~~ <i>Redevelopment of Agricultural and other existing Rural Buildings and sites for Business Purposes.</i> Amend the criteria of Policy K13 to include 'extensions to existing rural buildings' and 'redevelopment of appropriate buildings for existing or new business purposes'. Amend the criteria of Policy K13 to clarify the difference between unclassified roads and the SRN in terms of assessing traffic impacts in the rural area.
Mr Andrew Beall	K HA1, K HA2, K HA3 & K HA4	Section 6 Housing allocations	-	Oppose	Disagrees with the decision that Fawconer Road, Strokens Road and Coppice Road are the best options for development. Considers the A339 to be noisy and unsafe. Suggests Fawconer road is visited during an evening by BDBC to assess the poor parking situation.	-

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Suggests the site allocations are rethought. Considers the A339 junction to be a dangerous crossing which will be worsened by the increased traffic volumes as allocated development comes forward.	
Boyer (on behalf of Linden Ltd)	K2	-	-	Oppose	State that Policy K2 provides no basis for the mix of housing required and no clear direction on housing mix and need within the KNP area. Suggest that Policy K2 is clarified, with a clearer housing mix requirement in order to comply with the NPPG.	Clarify evidence and provide direction regarding housing mix.
Boyer (on behalf of Linden Ltd)	K3	-	-	Oppose	Consider it unclear to what extent applications need to 'address' the 'local housing need of elderly and infirm residents'. Suggest the Policy K3 is clarified in order to be clear and unambiguous to comply with the NPPG. Suggest that reference to the Lifetime Homes Standards is removed from the final sentence of Policy K3 due to the fact that during the BDBC Local Plan Examination, the statement of common ground confirms that Lifetime Home Standards have been replaced with Building Regulation requirements. Consider the requirement in Policy K3 for all homes to accord with Part M of the Building Regulations to be contrary to the NPPG. Consider this requirement to have no regard to viability and the potential to frustrate development.	Clarify Policy K3 regarding the need to address the housing needs of the elderly and infirm. Remove reference to the Lifetime Homes Standards from the final sentence of Policy K3.
Boyer (on behalf of Linden Ltd)	K12	-	-	Oppose	Suggest amendments to the wording of Policy K12 to bring it into accordance with the definition of conservation for heritage policy in Annex 2 of the NPPF.	Amend text as follows: <i>"...preserve, and <u>where appropriate</u> enhance the character of the area."</i>

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Boyer (on behalf of Linden Ltd)	K HA1	-	-	Oppose	State that, due to the close proximity of the A339, sufficient noise mitigation would be required at Fawconer Road to ensure amenity for future residents. Suggest that a requirement for air quality mitigation measures is added into Policy K HA1 given the proximity of the A339. Note that Criterion b) states access will be from 'Ashford Hill Road'. Suggest that as there is no Ashford Hill Road within proximity of this site, the Plan is updated accordingly. Assume the access will be from George Street, however this is unclear.	Add policy requirement for air quality mitigation measures. Update KNP accordingly to represent correct road name.
Boyer (on behalf of Linden Ltd)	K HA2	-	-	Oppose	Suggest that a requirement for air quality mitigation measures is added into Policy K HA2 given the proximity of the A339. Note that Criterion b) states access will be from 'Ashford Hill Road'. Suggest that as there is no Ashford Hill Road within proximity of this site, the Plan is updated accordingly. Suggest this should refer to George Street. Question the quality and usability of public open space in the east of the site due to the site being so narrow. Raise concerns that given the number of units proposed and the limited developable area (worsened by the presence of the SINC which will also require a buffer), densities will be high, out of character with the surrounding area, and therefore not in accordance with Policy K4. Note that there is no evidence that the site is under option from a housebuilder and state that this could delay site delivery. State that Land at Porch Farm has an option agreement in place with Linden Ltd.	Update KNP accordingly to represent correct road name. Add a requirement for air quality mitigation measures into Policy K HA2.

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
Boyer (on behalf of Linden Ltd)	K HA3	-	-	Oppose	Suggest the requirement for air quality mitigation measures is added into Policy K HA3 given the proximity of the A339. Consider the location of housing at this site uncharacteristic and squeezed into the open space currently acting as a buffer to the A339 for existing properties. Consider this contrary to Policy K4. Consider that the presence of the SINC and associated buffer will further limit the developable site area. Note that there is no evidence of an agreement in place which would allow access to the site and suggest this could delay the site coming forward. Note that there is no evidence that the site is under option from a housebuilder and state that this could delay site delivery. State that Land at Porch Farm has an option agreement in place with Linden Ltd.	Add a requirement for air quality mitigation measures into Policy K HA2.
Boyer (on behalf of Linden Ltd)	-	-	SEA	Oppose	Disagree with some of the conclusions reached at Land at Porch Farm. Consider the site has been scored unfairly with regards to biodiversity, climate change and historic environment and landscape. Disagree with a number of points in the SEA regarding the allocated sites. Question whether there is 'proportionate, robust evidence' as required through the NPPF. Representation provides alternative scoring and reasoning.	-

Respondent	Policy	Paragraph	Other	Support/Oppose	Summary of comments	Respondents suggested modifications
					Consider that the allocation of a reserve site would 'safeguard' the future of the KNP and suggest that Land and Porch Farm could form a reserve allocation. This could respond to changes to the housing requirement at borough level. The SEA considers development of the three smaller sites only, and considers the allocation at Land at Porch Farm with a smaller site forming a reserve site. The conclusion is reached in the SEA that Land at Porch Farm should not form the main allocation due to concern over the impact on the Grade II listed Porch Farm and the Grade 3 agricultural land at Porch Farm and in light of public opinion for smaller sites. Refute a number of these conclusions.	
Boyer (on behalf of Linden Ltd)	-	-	Site Assessment Report	Oppose	Object to the absolute nature of the scoring system and consider flexibility should be able to be applied to take into account the ability of some sites to enhance and improve on current situations. With regards to the site at Land at Porch Farm, there are a number of scores disagreed with: Ease of creating/impact of vehicular access to site, landscape character and diversity, visibility from rights of way, affect of public open space/ability to create more, AONB, impact on biodiversity, physical constraints, affect or detract from listed/historical buildings. Also disagree with the scores attributed to the allocated sites which don't account for potential high densities.	-
Boyer (on behalf of Linden Ltd)	-	Section 6 Housing allocations	Reserve Sites	-	Consider that the allocation of a reserve site would 'safeguard' the future of the KNP and suggest that Land and Porch Farm could form a reserve allocation.	Suggest allocation of a reserve site – promotes Land at Porch Farm.

Appendix 1: Full representation (including covering letter, which includes a summary of the comments, and appendix) from Basingstoke and Deane Borough Council (as Local Planning Authority) on the Submission version (Regulation 16) of the Kingsclere Neighbourhood Plan



**Basingstoke
and Deane**

Basingstoke and Deane Borough Council

Civic Offices, London Road,
Basingstoke, Hampshire RG21 4AH

www.basingstoke.gov.uk | 01256 844844
customer.service@basingstoke.gov.uk

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Ms L Porton
Parish Clerk
Kingsclere Parish Council
37 George Street
Kingsclere
RG20 5NH

Tuesday 13 March 2018

Dear Ms Porton

Local Planning Authority response to the Kingsclere Neighbourhood Plan: Post-Submission Consultation (Regulation 16)

The Local Planning Authority (LPA) fully supports the initiative of Kingsclere Parish Council to produce a Neighbourhood Plan (NP). The LPA recognises that a significant amount of work has gone into the development of the NP, and that extensive community involvement has taken place. The Neighbourhood Planning Group are commended for all their efforts in order to reach such an advanced stage in the NP making process.

Following the submission of the Kingsclere Neighbourhood Plan (KNP) on 4 January 2018, the LPA undertook a Compliance Check. The LPA confirmed, via letter to the parish council on 29 January 2018, that it is satisfied that the KNP and accompanying documents comply with the statutory requirements as set out in Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The following comments on the Submission KNP have been provided to assist the Independent Examination of the NP. This response is based on the documents and evidence submitted to the LPA, which includes the Submission KNP, Strategic Environmental Assessment Environmental Report, Basic Conditions Statement, Consultation Statement and Site Assessment Report. This response is

Many of the LPA's comments on the Pre-Submission KNP have been addressed as a result of amendments made to the submission version. These amendments are welcomed. However, the LPA considers that some of its comments remain either partially or not met.

The LPA's key areas of concern are:

- Additional clarity could be added to many of the policies and supporting text in order to help the decision maker to apply policies with confidence and clarity when determining planning applications and to ensure general conformity with the adopted local plan.
- Additional information would be beneficial to demonstrate that the housing allocation sites of Strokens Road, Fawconer Road and Coppice Road are capable of accommodating their stated dwelling capacities, as required by Policy SS5 of the Adopted Local Plan.
- The accuracy and precision of the maps needs to be improved. The council is able to assist with ensuring the maps used are of a high resolution and accuracy.

A schedule has been set out below which records how the comments made through the course of the pre-submission consultation have been addressed in the submission version. This also sets out where outstanding issues/concerns remain.

The LPA will be in touch shortly with regards to the examination procedures. If you require further information please contact me by phone on 01256 845318 or by emailing Vashti.gooding@basingstoke.gov.uk.

Yours sincerely



Vashti Gooding

Senior Planning Officer

CC: Sue Adams – Kingsclere Neighbourhood Plan Group and Parish Council

Enc. Local Planning Authority response to the Kingsclere Neighbourhood Plan: Post-Submission Consultation (Regulation 16)

Part 1 – How the LPA's comments on the Pre-Submission draft Plan have been addressed in the Submission Neighbourhood Plan and Remaining Issues.

The table below relates to the LPA comments provided in connection with the pre-submission Regulation 14 consultation, which was carried out between 9th January and 20th February 2017.

Where the Local Planning Authority comments on the Pre-Submission Neighbourhood Plan have been overcome (i.e through amendments) these have not been included.

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
Policy K1 Infill Sites	Policy K1 Sites within the Settlement Policy Boundary	It is questioned how this policy would operate and how it relates to the general presumption within the adopted Local Plan (ALP) that development of new housing is already acceptable in principle within the Settlement Policy Boundary (SPB). Furthermore the policy is titled 'infill sites' which is not consistent with the general approach of infill policies which are generally predicated on infilling small gaps in existing built up frontages within settlements which don't have SPBs. The LPA has concerns that this policy is not clearly defined and may not provide a practical framework for decision making. It is recommended that further consideration is given	PPG refers to policies being clear and unambiguous so they can be applied consistently.	Partially met. Policy title has been amended and reference to sites of a specified size removed. There is still a question around how this policy would operate and how it relates to the general presumption within the adopted Local Plan that development is already acceptable in principle within the SPB. New text has been added to criteria b). It is suggested that criteria b) is split into two criteria and additional wording added as follows to reflect the hierarchy of the documents listed:

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		to what the policy is seeking to achieve, how it would be implemented and how it relates to the policies of the ALP and the NPPF concerning the provision of new housing.		"b) comply with the design policies set out in the Neighbourhood Plan and EM10 of the Adopted Local Plan c) have regard to the Village Design Statement, Conservation Area Appraisal and policy."
Policy K2 Mix of Housing	Policy K2 Provision of housing to meet local needs	This policy needs to be clearly justified by evidence for the desired housing mix. Furthermore the terms 'greater proportion' and 'lower proportion' are ambiguous.	PPG refers to policies being concise, precise and supported by appropriate evidence	Partially met. Ambiguous terms 'greater and lower proportion' removed from policy. This policy needs to be clearly justified. Whilst sections 3.7 and 3.8 of the KNP refer to evidence from the census concerning the population of the parish and the current tenure and mix, there doesn't seem to be any specific local evidence referred to in the supporting text for this policy which sets out the housing needs of the parish.

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
				New text has been drafted for the first part of the policy. Suggest this text is amended as follows to ensure policy is clear and concise: “All proposals for new housing development must demonstrate how the types of dwellings provided will help ensure a balanced mix of housing for Kingsclere, particularly through the provision of homes designed for smaller households ~~including~~ of one, two and three bedroom accommodation and accessible purpose-designed homes for older people. ~~In view of the demographic trend towards an older population and the desire for smaller homes,~~” The final part of the policy refers to applicants providing evidence proportionate to the scale of the development proposed to justify the housing mix but there is no indication of what evidence is required and how it is determined what is proportionate.
paragraph 5.2.17	paragraph 5.2.13	The Council's Housing Team does not consider that local connection requirements should be imposed through planning policies and this issue should be addressed by the Council's Housing Allocation Policy, which prioritises affordable housing for those with a local connection. Policy K4 refers to determining local connection through	-	Not met. Supporting text still specifies local connection requirements and isn't in line with policy K2 which refers to the local connection being defined by the Basingstoke and Deane Borough Council Housing Allocations Scheme and any relevant planning policy guidance.

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		the Borough Council's Housing Allocation Policy – this approach is supported. This paragraph sets out very specific criteria for meeting the local connection which are unnecessary as the policy refers this test to the Council's Housing Team.		
Policy K5 Housing for older people	Policy K3 Housing for older people	This second sentence is more of a statement than a policy.	PPG refers to policies being clear, unambiguous and drafted so they are concise.	Partially met. It is suggested that this policy clarifies what is meant by the term 'housing for older people' and whether this includes all housing or just specialist housing. If this policy does require all homes to be in accordance with M4(2) and M4(3) of Building Regulations, this is more onerous than the adopted Local Plan requirements which could have implications for viability. Also suggest that policy wording is amended as follows to ensure general conformity with ALP policy CN4: "Planning applications which address the local housing need of elderly and infirm residents will be permitted where they meet a proven identified need and where the location

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
				~~provides access~~ is appropriate in terms of access to the facilities and services in the village along with access to public transport...”
Section 5.8	Section 5.5	Open spaces are an important part of the character of an area and Kingsclere benefits from a number that not only provide a setting for some of the significant trees but also contribute to the distinctive character of Kingsclere. This is separate from the functional role of open spaces that is covered elsewhere but deals with the contribution that they make to the character of a place, regardless of use. The importance of open spaces could be added here.	-	Partially met. Policy K6 now refers to open spaces. The supporting text hasn't been updated accordingly to refer to open spaces forming part of the character of the area.
Policy K8 Reinforcing Kingsclere's local character	Policy K6 Reinforcing Kingscleres Landscape character	The word 'Local' in the policy title should be replaced with 'Landscape' to clarify that this policy is aimed primarily at landscape rather than built form which is more suitably the subject of Policy K6. Consider adding another criteria to the policy to 'respect the open spaces within Kingsclere which contribute to its distinct character'	-	Partially met. Policy title amended to refer to landscape character and additional criteria added to refer to open spaces. Criteria a) should be amended as follows to ensure internal consistency and the hierarchy of planning policy documents: “Future development should respect the character and settlement pattern of the village ~~described in~~ by having regard to the BDBC Landscape Assessment and Kingsclere Village Design Statement.”

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
				Criteria b) now refers to views from the countryside and from local rights of way. The addition of views from anywhere in the countryside to this criterion needs to be defined to provide clarity for the decision-maker. For example the recently reviewed conservation area appraisal refers to particular views which could be referenced here or defined on a map. Other made neighbourhood plans in the borough have included illustrations of important views e.g. Bramley
Policy K12 Change of use for local shops, pubs and businesses	Policy K11 Change of use for local shops, pubs and businesses	Concerns are raised about this policy in relation to the evidence base to support its inclusion and whether sufficient clarification has been provided for its implementation. In addition, the final sentence is not considered to be precise enough to be effective in determining planning applications. The policy also needs to provide guidance of how viability will be tested.	PPG refers to policies being clear, unambiguous and drafted so they are concise, precise and supported by appropriate evidence.	Not met. It's assumed that the policy title should include the word conservation area to clarify that the policy only applies within the conservation area. This would be in line with the title of policy K12. Suggest policy title amended as follows: "Change of use for local shops, pub and businesses <i>in the conservation area</i>" The general conformity of this policy with ALP policies CN7 and CN8 is questioned. Policy CN7 and CN8 include additional criteria including: clearly demonstrating that the service or facility is no longer needed or, it is no longer practical, desirable or viable to retain them

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
				Furthermore this policy would be clearer if it was a criteria based policy referring to what would need to be demonstrated to comply, with a stand-alone sentence at the end. In addition there is no guidance in the supporting text to advise applicants of the evidence required.
Policy K13 Design of local shops, pubs and businesses in the conservation area	Policy K12 Design of local shops, pubs and businesses in the conservation area	It is unclear how much this policy adds to national guidance which requires development to 'preserve and enhance' the conservation area. The conservation area appraisal should be referenced here as it provides the evidence which the decision maker will need to assess planning applications.	NPPF section 12 deals with conserving and enhancing the historic environment. PPG states plans 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.	Partially met. Policy refers to Conservation Area Appraisal. However, it is suggested that the wording is amended as follows for internal consistency and the reflect the hierarchy of planning policy documents: "Business premises within the conservation area should ~~adhere to~~ have regard to policies in the Village Design Statement and Conservation Area Appraisal."
Policy K14 Re-use of agricultural and other	Policy K13 Re-use of agricultural	It is suggested that this policy is given further consideration in light of the approach in the NPPF (para 28) and policy EP4 (Rural Economy) in the ALP as there are some areas of potential	NPPF paragraph 28 refers to supporting a rural economy. Bullet point 1 refers to both	Partially met.

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
rural buildings for business purposes	and other rural buildings for business purposes	conflict as a more flexible approach is taken – for example they allow for both conversions of existing buildings and well designed new buildings in certain circumstances. It is also questioned whether this policy adds anything to the existing policy framework in the ALP. If this policy is retained then a positive addition to criterion a) would be to also refer to: “any adverse environmental impacts on the surrounding rural landscape <u>or adversely affect protected species</u>”.	conversions and sensitively designed new buildings.	Support clarification that the policy refers to permanent buildings. General conformity with ALP policy EP4 and national policy is questioned for the following reasons: - Some agricultural buildings can change use under permitted development rights. - Policy EP4 refers to both permanent buildings and previously developed land. - Policy EP4 refers to well-designed proposals of a scale appropriate to location referencing landscape, heritage and environmental impacts.
Policy K15 Conserving and enhancing biodiversity	Policy K14 Conserving and Enhancing biodiversity,	Whilst the goal of seeking to ensure that robust protection is provided in relation to biodiversity is supported, the second paragraph sets out some onerous requirements to quantify the level of biodiversity offsetting. This appears to be more prescriptive than the NPPF and EM4 of the ALP. A more general requirement could be more appropriate such as:	NPPF paragraph 118 refers to compensation for loss of biodiversity as a last resort.	No met. Suggest following policy wording to ensure general conformity with national policy and ALP Policy EM4: “Development proposals will only be permitted if significant harm resulting from development to designated ecological or geological sites and/or important habitat can be avoided, or if

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		'Where a net gain of biodiversity is possible, the details of such measures should be clearly set out in the information submitted with the planning application.'		that is not possible <i>adequately mitigated by developing an approach which results in a net gain in biodiversity.:</i> Where ~~net gain in biodiversity is possible~~ , development proposals <i>are likely to lead to significant harm to ecological or designated sites</i> should quantify how this will be achieved within the planning applications using a recognised and appropriate method. This may include ~~compensation, mitigation or offsetting measures and~~ must be based on thorough baseline surveys of habitats and species present on the site prior to development. Where a survey or assessment is required under this policy, it should be conducted at the appropriate time of year for the relevant species....."
Policy K17 Pedestrian walkways	Policy K16 Pedestrian walkways	This policy could also refer to provision of new or missing links. It would be beneficial if this policy was supported by evidence and maps showing existing footpaths and connections and priority locations for improved linkages.	PPG states that proportionate, robust evidence.	Partially met. Map has been inserted but it is of low resolution. The LPA are happy to work with the neighbourhood planning group to improve the quality of the map.
Policy K18 Parking	Policy K17 Parking	The Council is supportive of an approach to parking provision which is sensitively designed which reflects and enhances the rural character of the area as set out in the policy intent.	-	Partially met. The inclusion of wording 'where possible' allows for parking to be considered on a site by site basis. However it is

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		However it is suggested that this policy is given further consideration in light of the approach taken in policy CN9 (Transport) in the ALP particularly criterion h). Criterion h) refers to appropriate parking provision in terms of amount, design and layout. It also refers to the Council's adopted parking standards. This wording allows for flexibility on a site by site basis as there may be some instances where setting garages back from the street frontage or locating parking between houses (K18 criterion c) and d) may not be desired. The parking standards are currently being reviewed and it is intended that they will be adopted as an SPD in due course. The policy could stand alone as drafted with some refinement or could be included within the Good Quality Design policy.		suggested that the wording 'where appropriate' would align more closely with ALP policy CN9.

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
Policy K19 Local Green Spaces	Policy K18 Local Green Spaces	Concerns are raised about this policy in terms of the evidence base to justify each Local Green Space. It is possible to designate green space through neighbourhood plans but clear justification and evidence for their designation needs to be provided. It is recommended that additional information be provided within the plan setting out the particular local importance of the spaces identified and how their designation would accord with the requirements of paragraph 77 of the NPPF. Detailed maps are included in the appendix – the relationship between this policy and the appendix needs to be explicitly set out. It should also be considered whether these spaces already benefit from other forms of protection, e.g. through other legislation, as if they do then this would reduce the justification for designating them as Local Green Space. In this regard the PPG states that:	NPPF Paragraph 77 sets out the requirements for designating Local Green Spaces. PPG states that proportionate, robust evidence should support the choices made and the approach taken.	Partially met. Additional justification has been provided in Table 1 (pages 47-50) which is welcomed. This table usefully sets out how each open space meets the criteria for designation. However, the addition of LGS10 Newbury Rd/Cedar Drive which is made up of a number of smaller green spaces (a)-(j) needs to be fully justified. LGS10 is within table 1 but each green space within LGS10 would benefit from its own justification. It is understood that the neighbourhood planning group has contacted the owners of the open spaces being proposed including the borough council but received no responses. Policy K18 states “Development (housing &/or car parking) on designated Local Green Spaces will only be permitted in very special circumstances, such as essential utility infrastructure...” As the very special circumstances only apply to such things as essential utility infrastructure this conflicts with “housing

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		<i>"If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space."</i> For example it is noted that part of the Dell Recreation Ground (7) is a designated SINC. The PPG explains that Local Green Space does not need to be in public ownership, but does state that the qualifying body should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. If the landowners have not already been contacted it is recommended this is done.		and/ or car parking". It is suggested that "housing and/ or car parking" is deleted. It is also suggested that the following wording is deleted to ensure general conformity with national guidance and ALP policy EM5: ~~"...where the benefit outweighs any harm or loss and it can be demonstrated there are no reasonable alternatives."~~ It is noted that the maps contained in the appendix need to be snapped more accurately to the base map. The council is happy to work with the Neighbourhood Plan Group to improve the accuracy of these maps.
Policy K20 Green spaces in new developments	Policy K19 Green spaces in new developments	This policy would benefit from the provision of evidence demonstrating the need for a greater range of green space assets and what types of greenspace are required.	PPG states that proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the	Partially met. The addition of reference to BDBC Green Space Standards is welcomed. The supporting text could usefully provide detail of the type of green space required.

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
			intention and rationale of the policies.	
Policy K22 Heritage Assets	Policy K21 Heritage Assets	Whilst the principle of protecting the historic environment through the neighbourhood plan is supported, the policy does not appear to add to the existing policy framework set out in the NPPF and policy EM11 of the ALP.	PPG states Plans 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.	Not met. This policy is lengthy and would benefit from some of the content being included as supporting text. The use of criteria would help to break this policy up. References to the Kingsclere Village Design Statement and Conservation Area Appraisal should refer to ' having regard to ' these documents rather than 'adhering to' them to ensure internal consistency and to reflect the planning policy document hierarchy. The policy should also clarify if it applies to just designated heritage assets or non-designated heritage assets such as Buildings of Local or Architectural Interest for which a local listing is made by the council.
Site allocations (policies HA1, HA2, HA3)		The KNP would benefit from further explanation regarding the sites selected and those rejected. The Council also has some concern that it has not been demonstrated, to a satisfactory extent, that the housing allocation sites of Strokings	PPG states that proportionate, robust evidence should support the choices made and the approach taken.	Partially met. The supporting text now refers to the site selection process being set out in the site assessment report and the SEA,

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		Road, Fawconer Road and Coppice Road are capable of accommodating their stated dwelling capacities, as required by Policy SS5 of the Adopted Local Plan. A considerable number of constraints apply to these sites including: the presence of SINC's within or adjoining the site; trees within the sites; tree belts adjoining the sites which may merit a protective buffer; the need for landscape buffers within the site to protect the character of the area; and the impact of traffic noise from the A339 on the sites. It is not clear from the evidence presented that the housing capacity assessment has adequately taken account of these constraints. It is recommended that a more in-depth assessment of the housing capacities of these sites is provided. The Council can assist in this regard, if required. Further information on the deliverability of the sites would also be welcomed. These policies could also usefully benefit from some supporting text to set out the	With regard to housing capacity and deliverability, the PPG sets out what needs to be considered in a strategic housing land availability assessment which is essentially focused on deliverability encompassing an analysis of availability, suitability and achievability.	which accompany the Plan as supporting documents and provide a comprehensive background to the approach taken. It is understood that the neighbourhood planning group have sought confirmation from the site promoters that the capacity of the sites are reasonable taking account of the complex constraints present. This information was not provided as part of the submission documents and would be beneficial to demonstrate that the housing allocation sites are capable of accommodating their stated dwelling capacities, as required by the Adopted Local Plan. ALP Policy SS5 requires Kingsclere parish to identify sites/opportunities to meet at least 50 homes in and around the settlement. Small developments of less than nine units within the SPB will not qualify towards the target. Outside the SPB developments of less than five dwellings will not qualify. Therefore, if the SPB is to be redrawn as suggested, each of the allocations will need to accommodate at least 10 units in order to qualify against the requirement in Policy SS5. Overall, in order to comply with ALP policy SS5 the neighbourhood plan needs to allocate enough land to accommodate a minimum of 42 dwellings as 8 dwellings have already been delivered against the SS5 requirement via a qualifying planning permission (Planning application

Section/ Policy of Pre- submission Plan (reg14)	Section /Policy of Submission Plan (reg16) (where different)	Issue	Relevant National Guidance (NPPF and PPG)	Not met/Partially Met/Comment
		background/explanation of the site specific policy requirements. The maps in this section would benefit from being clearer so that any potential dispute over site boundaries is minimised. The Council can assist with the provision of these.		reference: 75019/BDB Land at OS parcel 452508 159220 rear of Longcroft Road). It would also be beneficial for criteria (a) of each of the policies to use the term 'approximately' rather than 'at least' when referring to yield. The resolution of maps 8-12 should be improved. The LPA is happy to work with the neighbourhood planning group to improve the resolution of the maps.
Appendix 1		As highlighted above, it is important that the NP sets out a clear position regarding the funding of infrastructure as it is not permitted to seek S106 for items that are intended to be funded by CIL. Appendix 1 refers to making an application to S106 funding but planning obligations should be sought to make an otherwise unacceptable development, acceptable in planning terms. Therefore S106 funding streams should be for specific projects. Applications could not be made for this funding.	The PPG sets out the operation of CIL	Partially met. Wording has been removed which referred to S106 and CIL funding. Suggest that in relation to project 1, the first sentence should also refer to Basingstoke and Deane Borough Council.

Part 2: Additional comments raised in relation to the Submission version of the KNP

In addition to the comments set out above which were raised in response to the pre-submission consultation, following consultation with specialist consultees, the LPA would like to make the following additional comments on the Submission version of the KNP.

Policy/section	Comments
General comment	The Plan would benefit from additional context being set out in the supporting text for each policy to explain the background and approach.
Policy K5	The supporting text could provide more detail to introduce the policy and set out the issue. Suggest that 'external lighting' is defined in the supporting text so that it is clear when this policy applies. Paragraph 5.5.4 states "Artificial lighting schemes are a consideration for new residential development..." but policy K5 does not specifically refer to residential development. Clarification of where this policy applies and whether it is only in relation to residential development proposals is required. The lighting specifications listed in the policy could more usefully be provided in the supporting text to ensure the policy remains concise.
Policy K7	The words 'and/ or' are included at the end of each criteria. This will cause problems when interpreting the policy. It is suggested for internal consistency that '/or' is removed from the end of each criteria. Also suggest that "would be affected" is amended to "may be affected" in criteria b).
Para 5.62	Suggest following wording for clarification: "Green spaces are an important part of the character of an area and Kingsclere benefits from a number that not only provide a setting for some significant trees but also contribute to the distinctive character of village. However, B&DBC's Green Infrastructure Assessment identifies Kingsclere as having a lack of green spaces. Although there are four children's play areas and two sport pitches in the village, these are underfunded and in need of repair. Informal green space is also lacking. Policies K19 and K20 seek to address this by provision of further informal green space however, community planning obligations or use of the Neighbourhood Fund element of CIL could be used, where this is in line with the Borough Council's R123 list and / or meets the Government regulations on the use of planning obligations. These could be used to Infrastructure Levy (CIL) contributions could also be sought to improve not just the provision of green spaces but other key B&DBC Green infrastructure objectives such as enhancing pedestrian access and links to existing formal green spaces as well as safe pedestrian access to the wider countryside surrounding the village and parish."
Para 5.6.4	Suggest the following addition for clarification: "It is important that both the B&DBC and Kingsclere allocations of CIL and investment and developer contributions under S106 are used to address the areas which residents have identified as a priority. B&DBC administer the CIL with 25% going to Neighbourhood Plan areas (the Neighbourhood Fund) to aid funding types of infrastructure that support the development of the area. Section 106 agreements will be used to secure planning obligations where appropriate."

Policy K8	Suggest following amendments for clarification: "The Neighbourhood Plan identifies the following strategic infrastructure projects as desirable to receive funding from the Kingsclere Parish Council allocation of the ~~CIL Funding~~ Neighbourhood Fund (in no particular order): a) The Recreation Playground equipment; b) Refurbishment / redesign of the Fieldgate Centre including outdoor equipment and playing fields; c) Provision for a dedicated space for the Youth Club and/or other youth facilities within the curtilage of existing community buildings; d) Provision of further informal green space within the Parish; and e) Provision of gym facilities in the Parish. The Neighbourhood Plan identifies the following strategic infrastructure projects as desirable to receive funding from Basingstoke and Deane Borough Council, or Hampshire County Council: a) Improvements to safe pedestrian use of the A339; and b) Improvements to the safety of the junction on the A339/Ashford Hill Road"
Section 5.7	The introduction to the infrastructure section doesn't seem to refer to the content of the policies following it.
Policy K10	The way policy K10 is currently worded means that 'all development' must meet the requirement to provide a connectivity statement. It is assumed that this wouldn't be required, for example, for individual dwellings or conversions of existing buildings to other uses. Suggest the following amended wording: "Where relevant, proposals for new developments must provide a Connectivity Statement setting out how the development will help achieve a fibre optic connection to the nearest connection chamber in the public highway. Wherever possible the development must provide suitable ducting to enable more than one service provider to provide a fibre connection to the development."
Policy K15	Suggest that "resilient to predicted impacts of climate change" is amended to "resilient to predicted impacts of climate change, pests and disease "
Policy K20	The wording of policy K20 would benefit from clarification of where this policy applies for example the addition of "in line with other policies" could be added to the end of the policy.
Appendix 3	As referenced above the accuracy of the maps in appendix 3 should be improved to ensure clarity. The Council is happy to work with the neighbourhood plan group to produce new maps or graphics throughout the neighbourhood plan.
General comment	The contents would benefit from listing all the policies. This will help the reader when navigating.

