

**Wootton St Lawrence Neighbourhood Plan,
Parish Council response to the Regulation 16 Consultation Responses**

Comments relating to objectives and non-policy specific aspects of the Plan

Respondent	paragraph/section of Plan document	Summary of comment/representation	Parish Council Comment
The Manydown Company Limited (Lucie Stone)	Section 2.3, Policy Objective B <i>'to maintain and visually enhance the physical separation of Wootton St Lawrence from the Manydown urban expansion of Basingstoke'</i>	Does not think the objective is consistent with adopted Local Plan policy SS3.10 (Manydown) and believe that the objective should be amended to be in general conformity.	This is a core objective of the Neighbourhood Plan which has emerged from extensive engagement with the local community and has received support from the local community at all the Plans consultation stages. It is considered that the Local Gap policy is consistent with Local Plan policy SS3.10 in particular with criteria (i) of that policy (see below) and as drafted does not hamper the delivery of the Country Park but reinforces one of its purpose.
HCC and BDBC as landowners (submitted by Matthew James)	Section 2.3, Policy Objective B <i>'to maintain and visually enhance the physical separation of Wootton St Lawrence from the Manydown urban expansion of Basingstoke'</i>	Does not think the objective is consistent with adopted Local Plan policy SS3.10 (Manydown) and believe that the objective should be amended to be in general conformity.	i. 'Retain the separate identity and character of Wootton St Lawrence and Oakley and restrict coalescence between the new development and these villages. The development will also retain the separate identity and character of Worting and Winklebury, including conserving the ancient boundary of the Roman Road as a green boundary. See also comment of the Local Planning Authority in respect of Policy WSL1 below.
Natural England	Section 4.2 – 4.6 Countryside and Environment section	No policy within the countryside and environment section of the NP directly relates to overall maintenance and enhancement biodiversity interest throughout the parish area. It is recommended that the NP has specific	National guidance makes it clear that policies within a Neighbourhood Plan should not cover areas which have been adequately covered in an adopted Local Plan. In this instance it is considered the matters raised by

		regard for the landscape and biodiversity and its enhancement within the parish.	Natural England are covered by Local Plan policy EM4 – Biodiversity, Geodiversity and Nature Conservation
Natural England	Section 4.2 – 4.6 North Wessex Downs AONB	No policy in the NP directly relates to the potential impacts of development within the AONB. It is recommended that specific regard for landscape is incorporated and the requirement for applications to be supported by a Landscape Visual Impact Assessment (LVIA) where appropriate, to address any impacts on the special qualities of the AONB.	In this instance it is considered the matters raised by Natural England are covered by Local Plan Policy EM1 – Landscape
Hampshire County Council Highways	Policy objective F (page 37) and Paragraph 5.3 (Action table, page 39)	The Manydown development is required to assess the potential impact on local highway network (including all local junctions) in order to provide appropriate highway mitigations. The exact details of highway improvements will be finalised through the planning application and determination process. As a general rule, the County Council are unable to use developer contributions for straight forward maintenance improvements unless they form part of the introduction of new infrastructure, for example, resurfacing the existing road as part of widening it to allow new cycleway/footway would be appropriate.	From the extensive community engagement undertaken the impacts of traffic on the everyday lives of residents came across as a key issue. Objective F' <i>to minimise the impact of new development on the local road network, and to improve road safety within the Parish;</i> This objective underpins a number of policies in the plan as a general comment the Parish Council will be seeking to ensure the Highway Authority address any potential off site highway impacts arising from the Manydown development on the country lanes of the Parish.

Representations Specific to Policies within the Plan

Policy WSL1: Local Gap Proposals for development within the Local Gap, will be acceptable provided it: 1. relates to the use of the land for informal recreation purposes 2. would not diminish the physical and/or visual separation of the village from the Manydown development area 3. would not compromise the integrity of the Local Gap, either individually or cumulatively with other existing or proposed development.			
Respondent	Policy	Summary of Representation	Parish Council Response
Basingstoke and Deane Borough Council	Policy WSL 1: Local Gap, (page 21)	The council has concerns about the specific boundaries of the Local Gap. Area 2 (as shown on Figure 9 of the supporting document) and Area 1 are considered to have been adequately justified. However, there are concerns that the land identified in Area 3 (to the east of the village) is not essential for preventing coalescence and delivering the aims of the policy. The LPA has provided a map showing what it considers to be a better justified boundary for the Gap.	The Parish Council welcome the acknowledgment by the LPA that the principle of the Local Gap has been justified. It is noted that the LPA are of the opinion that land to the east of the village of Wootton St Lawrence (referred to as Area 3 in the Gap Assessment Report) is not essential in preventing settlement coalescence. This area, lying between the village and the country park has been included on the basis of its contribution to the landscape setting of the village as is referred to in the supporting text to the policy (paragraph 4.3.4).
Gladman (Richard Agnew)	Policy WSL1: Local Gap	Object to the use of local gaps if they would act as an arbitrary tool to prevent sustainable development. Believe the local gap should be removed as it conflicts with basic condition a) and the local plan provides sufficient protection to prevent coalescence. Gladman don't believe sufficient evidence has been provided to justify the local gap.	See LPA comment above.

The Manydown Company Limited (Lucie Stone)	Policy WSL1: Local Gap	The assessment of consultation responses in the Regulation 14 Pre-Submission Neighbourhood Plan Consultation states that the former objection to the inclusion of land outside the country park and restriction of its use to informal recreation was not accepted on the grounds that there is “strong local support for the Local Gap”. Following the Regulation 14 Consultation Wootton St Lawrence produced a standalone document, following a recommendation from BDBC LPA, entitled “Assessment of the Landscape Setting of Wootton St Lawrence village to identify the extent of land or inclusion in a Local Gap” (“WSL Local Gap Evidence”). The WSL Local Gap Evidence is not dated nor does it have an author; it is contended that this document is an aspirational document rather than a sound report based on technical evidence. The BDBC Plan policies were adopted based on robust technical reports and intense examination in public. One such report included the Strategic Gap Topic Paper 2014 (“Local Gap Topic Paper”) which was produced with consideration of the Local Landscape Character Study which supported the inclusion of Policy EM2 “Strategic Gaps” in the BDBC Plan. The WSL Local Gap Evidence includes an extract from the Local Gap Topic Paper which states; <i>“The council considers that other strategic gaps to those listed in policy EM2 do not need to be identified as the threat of coalescence, as a result of allocated sites in the Local Plan, between other town and villages is not considered to be significant.</i>	See LPA comment above. Regarding the comment on the report titled “Assessment of the Landscape Setting of Wootton St Lawrence village to identify the extent of land or inclusion in a Local Gap” this was commissioned by the NP Working Group from the Planning Consultancy advising on the Plans preparation. It should be noted that the Local Gap is there to protect the villages downland setting and whether or not the development areas of the Manydown allocation are visible it is also intended to ensure that the country park and adjoining land adjoining the village to the south and east is not compromised by built development.
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		<i>However, the impact of any development in the future may need to be reviewed in a subsequent Local Plan.”</i> The WSL Local Gap Evidence then goes on to state <i>“Thus it was acknowledged that the need for further Gaps to be considered could arise.”</i> But this does not acknowledge that the creation of additional Local Gaps would be reviewed within the current BDBC Plan period thus were not considered necessary, either by the technical studies or the Inspector, at the current time. By its own admission the WSL Local Gap Evidence states that the topography to the south and east of the village, along with additional planting that is establishing within the proposed Country Park allocation, screens the village of Wootton St Lawrence from Basingstoke and will “limit views of The Manydown Garden Town from the village” (paras 2.5; and also referenced in paras, 2.6, 3.1). 4.3.2 of the WSL Plan refers to Policy EM2 Strategic Gaps of the BDBC Plan and states <i>“there is no consideration for the village of Wootton St Lawrence”</i>; this is incorrect. On 20 October 2015 “Coalescence and surrounding neighbourhoods” was subject of a discussion at the Examination in Public wherein changes to the policy wording of SS3.10 (i) were made further to the documented conclusion (MF18 – Statement on Policy SS3.10, criterion (i) – Coalescence and surrounding neighbourhoods); <i>“Through the pre-submission consultations and the discussion at the hearings, it was generally accepted</i>	
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		<i>that it would be appropriate for the policy to seek to retain the separate identity and character of Wootton St Lawrence and restrict coalescence between the new development and the settlement. This would be principally achieved by the proposed country park to the north-west of the allocation.” [MF18]</i> Whilst it is recognised that there is local support for a Local Gap there is no technical basis or evidence for inclusion of additional land which is outside the Country Park allocation as part of a Local Gap. The Manydown Company Limited continue to strongly object to their land being included in WSL1 Local Gap given the lack of supporting, technical evidence.	
HCC and BDBC as landowners (submitted by Matthew James)	Policy WSL1: Local Gap	Note that the policy has been amended since pre-submission, and has additional evidence to support the policy, however as the country park will be subject of detailed master planning and stakeholder engagement they believe that the proposed boundary may prejudice this process. They add that they would be keen to engage the Parish Council and others in developing ideas and strategies for the country park. Does not think the objective is consistent with adopted Local Plan policy SS310 (Manydown).	The offer to engage with the Parish Council and local community in master planning the Country Park is welcomed.

No representations were received in respect of policies WSL2 (Local Green Space) and WSL3 Public Rights of Way

Policy WSL4: Light Pollution

Outside of the Manydown site allocation, development proposals that include external lighting must be accompanied by a lighting scheme prepared in accordance with the latest national design guidance*. Permission will only be granted where the submitted lighting scheme demonstrates that the following criteria can be achieved:

- i. there is no adverse impact on neighbouring uses or the wider landscape;
- ii. will not have any adverse impacts on the habitats of protected species;
- iii. light levels are the minimum required for essential security and working purposes; and
- iv. the potential for glare and spillage is kept to a minimum.

Where appropriate, conditions will be imposed that will seek to control the times of external illumination.

Where the proposal is for new or extended buildings, the submitted details should demonstrate that they have been designed to avoid unnecessary light spillage from internal lighting.

** The Institution of Lighting Engineers 'Guidance Notes for the Reduction of Obtrusive Light' 2005*

Respondent	Policy	Summary of Representation	Parish Council Response
Natural England	Policy WSL4 (page 25)	Policy WSL 4 is welcomed and it is recommended that particular reference is made within this to impacts of light pollution on bats and lighting of ecologically sensitive areas.	The Parish Council are happy for the supporting text to this policy to be amended, to expanding on the existing sentence 'Artificial lighting can have detrimental impacts on wildlife habitats too. (Paragraph 4.6.1)

Policy WSL5: New Dwellings

New dwellings will only be permitted in the following circumstances:

- 1. Where the proposed dwelling(s) meet the criteria set out in Policy SS6 of the Local Plan. or**
- 2. The infilling of a restricted gap within the settlements of Wootton St Lawrence, Ramsdell, West Heath and Charter Alley subject to:**
 - a) the gap being within an otherwise continuous built up frontage to the public highway used by vehicular traffic**
 - b) the gap is not exceeding a width of 30 metres when measured between the buildings on either side.**

Other than dwellings permitted for the circumstances set out in Local Plan Policy SS6 (f) no dwelling consented should exceed 100 square metres gross external area (GEA) and where more than one unit is provided then at least 50% of the new units should not exceed 80 square metres gross external area (GEA) All proposals for new dwellings should demonstrate that they meet the following criteria:

- 1) There would be no harm to the amenities enjoyed by the occupiers of neighbouring properties by reason of overlooking or overshadowing,
- 2) Respects the character and pattern of surrounding development,
- 3) It would not lead to the loss of attractive features on or adjoining the site such as trees, hedges, walls or buildings that contribute to the character of the area

Respondent	Policy	Summary of Representation	Parish Council Response
Historic England	WSL5: New dwellings (page 27)	Request that an additional to bullet 2) to ensure that design of new buildings include consideration of the potential impacts to heritage assets including the contribution made by their setting and have included suggested wording within the representation.	The Parish Council are happy to take on board this request from English Heritage and amend the Policy wording.
Gladman (Richard Agnew)	Policy WSL5: New dwellings	Gladman believe that seeking to set a maximum external area is an overly prescriptive requirement and would not allow for schemes to take into account of the surrounding area or for larger plots to have equivalent space. They also believe it would conflict with the design policies in the NPPF, in particular paragraph 127 (e).	It is considered the policy as drafted accords with the spirit of paragraph 125 of the NPPF, in particular the text highlighted in bold below: <i>'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.'</i>

			Furthermore it is not accepted that there is any conflict with paragraph 127 of the NPPF. This policy acknowledges local circumstances and is supported both by evidence and the community engagement that we have undertaken.
HCC and BDBC as landowners (submitted by Matthew James)	Policy WSL5: New dwellings	Request that additional wording is added to exclude the Manydown site allocation from the policy. Believe that the inclusion of the Manydown site within the policy could affect its ability to meet Policy EM10(b) of the Local Plan and para 10.23 of the Manydown	The intention is that this policy does not apply to the Many down site allocation and the Parish Council are happy to amend the policy wording and supporting text to give greater clarity.
Policy WSL6: Replacement or extension of dwellings The replacement or extension of a 'dwelling' will be permitted where the proposal accords with the criteria set out in criterion (d) of Policy SS6 of the Basingstoke and Deane Local Plan (2011 – 2029) and provided that: 1. it would not result in a disproportionate increase in size over the existing dwelling 2. it is sympathetic to the appearance and character of the existing dwelling and the surrounding area 3. it would not harm the amenities enjoyed by the occupiers of neighbouring properties by reason of overlooking or overshadowing 4. it does not lead to the loss of attractive features on or adjoining the site such as trees, hedges, walls or buildings that contribute to the character of the locality Ancillary annexe accommodation Where an extension is to provide for a residential annexe it should accord with the above criteria and: a) not capable of being made into a separate dwelling b) be linked internally to the principal dwelling and be designed in such a way as to easily enable the annexe to be used as an integral part of the main dwelling at a later date. A separate external entrance to the annexe may be acceptable provided it is subsidiary to the entrance to the principal dwelling c) have no boundary demarcation or sub-division of garden areas between the curtilage of the principal dwelling and the annexe			
Respondent	Policy	Summary of representation	Parish Council Response
Basingstoke and Deane Borough Council	Policy WSL 6: (Page 29)	Policy WSL6 sets out a number of criteria for assessing applications for the replacement or extensions of dwellings in the parish. Additional clarity should be added to the supporting text to clarify what would constitute 'a disproportionate increase in size of the existing	The comment is noted and the Parish Council are happy to revisit the supporting text to provide greater clarity in the determination of planning applications.

		dwelling'. This would help the decision maker to apply the policy in a consistent manner.	
Historic England	Policy WSL 6: New dwellings	The plan area includes a number of listed buildings, whilst other buildings may qualify as non-designated heritage assets the loss of which would be encouraged through the present policy wording, therefore the policy requires some clarification on how consideration be varied where it would affect a heritage asset. They have included the following suggesting wording within the representation. <i>5. The loss of the building and construction of a replacement would not result in the unjustified loss of, or harm to, a heritage asset. Proposals that would result in harm to a heritage asset will require robust justification on the basis of public benefits that could not otherwise be delivered.'</i>	The Parish Council are happy to accept this additional criteria being added to the Policy.
No representations were received in respect of policies WSL7 (Detached buildings in the gardens of dwellings), WSL8 (Residential Garden Extension) and WSL9 (Valued Facilities)			
Policy WSL10: Provision of Community Facilities Where there is a clearly demonstrated need, new, replacement and relocated day nurseries, church and village halls will be permitted provided: 1. that there are appropriate levels of parking provided 2. where it is a replacement or relocated facility, it should be at least equivalent to the capacity and quality as the existing facility 3. it does not adversely affect the amenities enjoyed by any nearby residential properties 4. it is well related in both visual and accessibility terms to either Ramsdell or Wootton St Lawrence and 5. the building is of a scale and design that is in keeping with its surroundings.			

Policy WSL11 Employment Sites

Where new or extended employment uses are proposed, then, subject to all other relevant development planning policies, it will be permitted where they:

a) accord with all relevant development plan policies, including the criteria set out in Local Plan Policy EP4,

and

b) would not adversely impact on the amenities enjoyed by nearby residential properties.

Respondents	Policy	Summary of Representation	Parish Council Response
HCC and BDBC as landowners (submitted by Matthew James)	Policy WSL10: Provision of community facilities and Policy WSL11: Employment sites (pages 36 and 37)	Request that wording is added to exclude the Manydown site allocation from these policies.	The Parish Council are happy to amend the policy in line with this comment.