

Gosport Borough Local Plan 2011-2029: Consultation Draft (December 2012)

SUMMARY AND ANALYSIS OF CONSULTATION RESPONSES



GOSPORT
Borough Council

Introduction

Gosport Borough Council conducted consultation on the Gosport Borough Local Plan 2011-2029 between 19th December 2012 and 13th February 2013. The Council received 50 representations, of which 18 were from residents and 32 from a range of organisations which resulted in 486 comments. This document sets out a summary of comments received together with a consideration of each comment together with any proposed changes to the Local Plan. The schedule also contains comments relating to associated documents including the Sustainability Appraisal and Habitats Regulations Assessment.

The original comments are available to view at the Council Offices and the reference number enables the particular comment to be found easily in the original representation.

Abbreviations used.

BRT	Bus Rapid Transit	HRA	Habitats Regulations Assessment	SHLAA	Strategic Housing Land Availability Assessment
CIL	Community Infrastructure Levy	LDF	Local Development Framework	SINC	Site of Importance for Nature Conservation
CMP	Construction Management Plan	LTP	Local Transport Plan	SLA	Service Level Agreement
CPO	Compulsory Purchase Order	MCA	Maritime and Coastguard Agency	SPD	Supplementary Planning Document
DIO	Defence Infrastructure Organisation	MMO	Marine Management Organisation	SRN	Strategic Road Network
EA	Environment Agency	MoD	Ministry of Defence	StAG	Strategic Access to Gosport (study)
GBC	Gosport Borough Council	NE	Natural England	TA	Transport Assessment
FBC	Fareham Borough Council	NPPF	National Planning Policy Framework	TfSHIoW	Transport for South Hampshire and Isle of Wight
HA	Highways Agency	PUSH	Partnership for Urban South Hampshire	UAB	Urban Area Boundary
HCC	Hampshire County Council	RCY	Royal Clarence Yard	WRAP	Water Resource Management Plan

RESPONSE TABLE: SUMMARY AND ANALYSIS OF CONSULTATION RESPONSES

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
Overall Comment			
A1/1	A resident	The Plan is welcome and visionary. When achieved it will transform Gosport.	Noted
A1/2	A resident	The Plan needs a summary or highlights for the average reader.	Expanding Paragraph 5 relating to contents of the Plan will in effect be a summary of the Plan's key points.
A2/1	A resident	The Plan includes a very impressive set of proposals.	Noted
A10/1	A resident	The Borough Council is commended on producing one overarching Local Plan rather than a number of documents proposed under the previous system which included a Core Strategy and a Site/Allocations and Delivery Plan.	Noted
A15/40	English Heritage	English Heritage considers that the Draft Borough Local Plan gives a real sense of the extent and importance of maritime heritage in the Borough, and the importance attached to that by the Council, which we very much welcome.	Noted
A18/24	A resident	Overall, this is an excellent document and it is pleasing that numerous references are made throughout concerning the need to have regard for nature conservation and biodiversity issues in future planning and development within the Borough.	Noted
A22/1	HCC Archaeology	Pleased to see that due regard has been given to the historic environment of Gosport which has a considerable number of locally and national heritage assets that make a major contribution to its character and local distinctiveness.	Noted

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A29/1	Hampshire & Isle of Wight Wildlife Trust	Pleased to see the councils commitment to nature conservation as set out in this local plan. Particular concerns outlined below.	Noted
A30/1	Beaulieu Properties LLP (Savills)	<p>Generally supports the Plan. Reservations are set out below.</p> <p>The Plan is a clear, concise and well referenced document, clearly highlighting the Plan's accordance with the National Planning Policy Framework and local evidence base studies, including the South Hampshire Refresh and the Gosport Borough Council Strategic Housing Land Availability Assessment.</p>	Noted
A31/1	Lee-on-the-Solent Residents Association	We found the plan less satisfactory than the old Local Plan, although we understand that the final review plan will be more precise, this document was difficult to read given the level of repetition and the number of documents that it refers to at the bottom of each page.	<p>It is considered that the Plan is as detailed as necessary to address the key issues identified and to accord with the NPPF. However it is recognised that certain elements of the plan, for example particular development sites as well as issues such as design and parking, will be subject to more detailed Supplementary Planning Documents.</p> <p>It has been necessary to introduce an element of repetition as the Plan will not normally be read in its entirety and therefore it has been necessary to include important elements in more than one section. It is hoped that the references will make it easier for users to link to other documents. These footnotes do not form part of the Plan and will be updated periodically once the Plan is adopted. Footnotes also reduce the need for additional text thus making the plan shorter</p>

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			than it otherwise would need to be.
A35/1	Environment Agency	In general we are pleased with the scope and content of the document and are encouraged by the inclusion of most aspects that fall within our remit.	Noted
A47/1	A resident	I support the sentiments in these proposals, I just cannot and do not believe in Gosport Borough with regard to (a) keeping their word (b) protecting land/heritage. You seem to take pleasure in destroying things that should be preserved.	The Local Plan will provide the framework for future decision-making on planning applications and any departures from it will be explained within the relevant Committee Report (and accompanying minutes) setting out any other material considerations. The Borough Council is proud of its record on restoring heritage sites in the Borough, of which there have been many. Several of these sites have won national awards for the regeneration historic sites in a sensitive yet viable manner.
A49/1	A resident	Support - Excellent document, I just want it to happen more quickly!	Noted
CHAPTER 1: INTRODUCTION			
A7/1	Marine Management Organisation	The Borough Council may wish to make reference to the Marine Policy Statement in the introductory section of the document.	Include a reference in the Introduction regarding the Marine Planning Statement.
A38/1	Gosport4Sail Community Interest Company	Section 1.5 should mention "the importance of maximising the superb harbour asset in the regeneration of Gosport and recognise the importance of supporting initiatives which will maximise the advantage in marine and other businesses, jobs, tourism etc."	Include similar wording under the 'Delivering a Prosperous Economy' bullet point.
CHAPTER 2: NATIONAL AND SUB-REGIONAL CONTEXT			
A31/2	Lee-on-the-	Box 2.1, First point - New development on urban	Agree and it is acknowledged in Box 2.1 that the PUSH

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	Solent Residents Association	sites could cause further strains on existing infrastructure. Brownfield sites should be used but regard must be given to the infrastructure. In some cases there may not be any way to improve a limitation e.g. need for more school places.	authorities need to plan for improvements to transport and other infrastructure to accompany new development.
CHAPTER 3: GOSPORT PROFILE AND KEY ISSUES			
A34/1	A resident	3.4 - Hard to believe that the Council is expecting an increase in population of 1.2% by 2029, just under 1,000 people. What are you doing to plateau, and ultimately reduce, your population? Could your family planning and counselling facilities be improved?	Latest populations from HCC indicate a population increase of about 2.2%, just under 2000 people. Issues of population control are beyond the scope of the Local Plan. Instead it is the Local Plan's role to manage growth and to ensure that there is sufficient land available for housing, employment facilities and infrastructure whilst protecting the quality of the local environment.
A15/1	English Heritage	We welcome the recognition in paragraph 3.9 of the significant naval heritage across the Borough, including the forts and listed buildings. However, this seems then to be rather underplayed in paragraph 3.34, where one would have expected the significant naval heritage to be proclaimed and celebrated. This paragraph should also explain the significance of non-designated but locally important assets.	Some of the detailed references to heritage in Paragraph 3.9 are more appropriate in Paragraph 3.34. Therefore it is appropriate to amend both accordingly to place greater emphasis on the Borough's maritime heritage in Paragraph 3.34. Section 3 is intended to be a brief overview of the characteristics and issues of the Borough and consequently an explanation regarding the 'significance of non-designated but locally important assets' is more appropriate in sections which deal with policy, particularly Section 8 relating to design and heritage.
A38/2	Gosport4Sail Community	Section 3.9 under Gosport Profile and Key Issues and Economy and Employment sub section, there	Agree that it would be useful to mention the utilisation of the Harbour asset to stage international sailing

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	Interest Company	should be mention of the importance of utilising the harbour asset to stage international sailing events and to encourage initiatives executing this aim and perhaps add to Summary section too.	events. It is considered that the text associated with Policy LP19 may be a more appropriate section.
A31/3	Lee-on-the-Solent Residents Association	3.19 – We disagree with the statement re bus coverage being relatively good. Not all areas in Borough have adequate coverage especially at night.	Re-phase acknowledging that there some weaknesses in coverage.
A31/4	Lee-on-the-Solent Residents Association	3.20 – We would agree strongly with last sentence. If the Eclipse bus had a route to include Daedalus this would go a long way to encourage people out of cars.	The Borough Council agrees that such services to Lee would encourage greater use of non-car modes. There are currently no plans at this stage to introduce Eclipse Services to Lee-on-the-Solent but there may be opportunities in the future to introduce bus priority measures to link Lee including the Daedalus site with the BRT bus way particularly as demand increases in relation to the Daedalus site.
A31/5	Lee-on-the-Solent Residents Association	3.28 – This is an optimistic view of Gosport’s High Street	It is considered that this represents a fair assessment of the Town Centre in terms of both its strength and weaknesses. More detailed assessment is contained in supporting evidence studies.
A31/6	Lee-on-the-Solent Residents Association	3.29 – There is mention of Lee’s thriving High Street, which could attract people into Gosport. We are slightly concerned that money spent on Gosport’s High Street may not alter the current situation and that at this stage this has to be accepted. It might be better to invest in more thriving shopping areas, which show potential for growth such as the Lee High Street.	The Local Plan identifies regeneration opportunities in both Lee-on-the-Solent and Gosport which have the potential to benefit both centres.
A31/7	Lee-on-the-Solent	Summary of Issues 3.36 – We strongly support the	Noted

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	Residents Association	issue that Jobs should come before housing.	
Summary of Issues			
A15/2	English Heritage	We welcome and support the inclusion of references to the Borough's built heritage and distinct maritime character in the summary of issues.	Noted
A35/2	Environment Agency	We support the recognition of bullet points 2, 5, 9 and 11 within this list. However, we do feel that flood risk could be specifically mentioned within bullet point 11.	Amend to specifically mention flood risk as an issue.
CHAPTER 4: VISION FOR GOSPORT BOROUGH AND LOCAL PLAN OBJECTIVES			
Vision: Gosport to 2029			
A15/3	English Heritage	Welcome and support the inclusion of references to making the best use of the Borough's maritime heritage.	Support welcomed.
A26/1	Natural England	Support the intentions set out within the Borough's Vision and Objectives, in particular the reference within the Vision to enhancing the environment; <i>'Development will respect and where possible enhance the environment.'</i>	
A30/2	Beaulieu Properties LLP (Savills)	The plan has a clear vision that looks to ensure the regeneration of the Borough and sets the strategic context up to 2029. The recognition of the need to regenerate Gosport through key opportunities is supported. The balance between embracing new opportunities and protecting and enhancing existing businesses is recognised, but may need to be more explicitly set out in places. These are touched on in individual areas of objection.	
Objectives			

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A35/3	Environment Agency	We particularly support the inclusion of the following Objectives: 1, 2, 6, 19, 20, 21, 22, 23, 24 and 26.	Support welcomed
A30/3	Beaulieu Properties LLP (Savills)	Objective 1 -The prioritisation of brownfield urban regeneration is supported The recognition that brownfield sites in accessible locations should be used to maximise efficiency and effectiveness of development in order to encourage sustainable development is paramount and supported.	Support welcomed
A30/4	Beaulieu Properties LLP (Savills)	Objective 2 Support - The need to maximise economic regeneration opportunities at the Waterfront is crucial to ensuring the vitality and viability of Gosport is secured and to deliver both social and economic benefits.	Support welcomed
A15/4	English Heritage	Particularly welcome and support Objectives 2, 3, 4, 7, and 8.	Support welcomed.
A18/1	A resident	Objective 6: This is laudable and I support the policy, but no habitat management has been carried out on this area since the housing development was completed several years ago.	Support of the objective is welcomed. Detailed issues such as a habitat management plan are not appropriate to be included in the overriding Local Plan objectives.
A26/3	Natural England	Objective 7 could be amended to include ' <u>...landscape character and historic built environment...</u> '	Include landscape character in Objective 7.
A30/5	Beaulieu Properties LLP (Savills)	Objective 8 Support - The recognition that access has to be safe is crucial. Obtaining access along the waterfront has to be weighed up with the issue of health and safety whilst retaining active boatyard and marine uses along the water's edge. In such active locations safety and security is of the utmost concern to occupiers.	Support welcomed
A30/6	Beaulieu	Objectives 9-12 Support - The support for the	Support welcomed

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	Properties LLP (Savills)	economy through local jobs, sufficient employment land being earmarked and support for leisure and tourism is important and will echo Objective 2 in maximising regeneration opportunities and balance with Objective16 in providing for housing need. These latter two may involve some employment uses being relocated to free up sites more suited to housing or moving employment sites to new rationalised premises. This is an overall benefit for the Borough as a whole, and such a comprehensive approach needs to be taken.	
A30/7	Beaulieu Properties LLP (Savills)	Objective 16 Support - This is crucial to meeting Gosport's needs and the range of housing types is crucial to a suitable population mix that will ensure the Borough's ongoing success.	Support welcomed
A37/1	Sport England	Support Objectives 18, 19 and 20 although include 'sport' within objective 19 to ensure the policy links with the NPPF	Amend accordingly
A26/2	Natural England	Strategic objectives 21-26 are supported.	Support welcomed
A1/3	A resident	The Plan is light on how the objectives will be achieved.	The objectives set out the Council's overall aims for the Plan. The polies in the Plan aim to deliver the objectives. The implementation of the policies will be monitored through measures set out in the Implementation and Monitoring Section and a progress report on these objectives will be included in the Annual Monitoring Report.
A38/3	Gosport4Sail Community Interest Company	Vision should include mention of supporting sailing initiatives which showcase Gosport to the world, generate jobs and support marine businesses.	Include reference to the importance of sailing events in the vision at the start of the ' Delivering A Prosperous Economy' section.

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		Furthermore, with little or no facilities for teaching children sailing in the area, the Gosport Plan should support creating a training centre on one of the redundant MOD sites in the Haslar Marine Technical Park and adjacent lake. This will greatly enhance youth facilities in the area and create jobs - particularly in the 19-25 age group.	Include training with regard to Blockhouse in the 'Vision-Regenerating Gosport through the delivery of high quality sites'. Policy LP6 (point 4a) in relation to Blockhouse already mentions training uses including marine related training within the Policy. The supporting text also mentions the potential to expand sailing training on the site.
CHAPTER 5: SUSTAINABLE DEVELOPMENT			
A13/1	Portsmouth Water	Fully supportive of policies to use natural resources prudently and adapt to climate change. This is reflected in our current Water Resources Management Plan and will form the basis of our next plan.	Noted
A30/8	Beaulieu Properties LLP (Savills)	Support - The recognition that there is a need to ensure that sufficient land of the right type and in the right place is available is the first part of the solution; the second part is that this may require some uses to move to enable the right land to be freed up in the right places for the right uses. This is recognised in the proposals for, amongst other areas, the Waterfront Regeneration Zone, including specifically Royal Clarence Yard as the key element of this zone for employment uses, and the Daedalus Enterprise Zone in accommodating marine employment uses.	Noted
Policy LP1: Sustainable Development			
A25/1	Hampshire County Council	Hampshire County Council supports the aspiration of this policy because it is effective, justified and	Support welcomed.

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		sufficiently flexible to respond to the changing demands of the County Council in its role as a public service provider. The County Council also considers Policy LP1 to be sound as it is consistent with the National Planning Policy Framework.	
A35/4	Environment Agency	Within Paragraph 1 of this policy, reference is made to working proactively with applicants jointly to find solutions we would suggest in order to make this policy even stronger the following wording should be included... <i>'Proactive and early engagement with relevant agencies should also be encouraged'</i>	Whilst agreeing with the sentiment as this is the Planning Inspectorate's model policy it is not proposed to amend it.
Infrastructure			
Introduction and Local Context			
A35/5	Environment Agency	We support the principle set out in Paragraph 5.4 of the justifying text of this policy and very much encourage the principle of Paragraph 5.6	Support welcomed
Policy LP2: Infrastructure			
A23/1	Southern Water	Support Policy LP2 which seeks to co-ordinate development with provision of infrastructure. This will help to ensure that a high level of service can be maintained to both new and existing customers.	Support welcomed.
A25/2	Hampshire County Council	The County Council broadly supports Policy LP2.	Support welcomed and the need for on-going dialogue for the use of developer contributions is acknowledged.
Overarching approach (point 1 and supporting text)			
A26/4	Natural England	Include green infrastructure within the listing provided within para 5.10.	Agree and amend accordingly.
A35/6	Environment Agency	We support the recognition and inclusion of bullet points seven and nine in Paragraph 5.10 and support the underlying principle of Paragraph 5.11.	Support welcomed

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A46/1	Gosport Society	Support – We fully support this policy, however, the important point in 5.11 ‘delivering the necessary infrastructure at the right place and at the right time’ needs to be strongly emphasized. In the past this has not always been the case.	<p>The appropriate infrastructure to support new development will normally be achieved through the implementation of the Local Plan policies in liaison with the infrastructure providers (as outlined in the Infrastructure Delivery Plan).</p> <p>In certain cases not all the infrastructure will be secured due to competing pressures and priorities which can affect the viability of the development. In such circumstances the benefits of regenerating the site will need to be considered against securing these other requirements. On major applications such considerations will be reported to the Council’s Regulatory Board. However it is important to recognise that there will be certain infrastructure which will be absolutely essential for a scheme to go ahead and which could not take place without it (eg certain flood management, transport or green infrastructure measures).</p>
Infrastructure supporting new development (point 2)			
A31/8	Lee-on-the-Solent Residents Association	2 b) – We welcome the inclusion of “off-site” requirements. Will the Inspector support this?	It is a well-established principle that developers can make arrangements to fund off-site infrastructure which are made necessary by the development.
Developer contributions (point 3)			
A25/42	Hampshire County Council	<p>The County Council supports the Borough Council’s intention to secure necessary infrastructure and community facilities via developer contributions.</p> <p>The County Council also acknowledges the importance of S106 contributions. The County</p>	Support welcomed.

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		Council, as a major public service provider, would seek a formal role in the establishment of appropriate S106 contributions and in the preparation of any forthcoming Community Infrastructure Levy and therefore looks forward to a continuing dialogue with the Borough.	
A25/3	Hampshire County Council	An additional paragraph is required to explain how developer contributions for transport infrastructure will be gathered using the Highway Authority's Transport Contribution Policy until CIL is adopted. The text of such a paragraph could be as follows: <i>"Until CIL is adopted transport Infrastructure will continue to be funded by developers in accordance with the Highway Authority's Transport Contribution Policy."</i>	It is the Borough Council's intention that the CIL Charging Levy and the Local Plan 2011-2029 will be examined and adopted at the same time. Consequently it will not necessary to set out an interim arrangement in the Pre-Submission version. Prior to their adoption the current arrangements set out in the Gosport Borough Local Plan Review (2006) and outlined on the Borough Council's pre-application web pages will still apply.
A23/2	Southern Water	Propose an additional bullet point to policy LP2 in order to recognise that contributions in addition to the CIL and S106 planning obligations may be required: <u><i>Contributions in addition to the CIL and S106 planning obligations may be required on a site by site basis, for example towards local sewerage infrastructure. Developers should contact service providers as early as possible in the planning process to determine contributions required.</i></u> Clarification is required regarding developer contributions. Bullet point 3 does not been recognise that developer contributions may also be required	It is considered that Point 2 requiring adequate infrastructure will cover most of Southern Water's concerns. Additional reference to Southern Water's concerns can be included in the justification text. Such measures relating to local sewerage infrastructure can be secured by a planning condition and there would need to be an agreement between the service provider and developer to implement the infrastructure to support the development.

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		<p>through direct agreements with utility providers.</p> <p>Southern Water seeks developer contributions towards local on-site and off-site wastewater infrastructure. This is because Ofwat, the water industry's economic regulator, takes the view that local enhancements required to the sewerage system as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>However, water companies have limited powers to prevent connections to the sewerage system, even when capacity is insufficient. Planning authorities therefore have an important role to play, through planning conditions, to ensure that the necessary local sewerage infrastructure is delivered. If the necessary infrastructure is not delivered, pollution from foul water flooding would occur as a result of overloaded local sewerage systems.</p>	
A30/9	Beaulieu Properties LLP (Savills)	<p>Object - Paragraphs 5.12 and 5.13. It is necessary to ensure that developer contributions do not make sites unviable and that sites can be delivered.</p> <p>There are complexities associated with larger sites, such as the Gosport Waterfront, including land</p>	<p>Agree that viability is an important consideration and it is proposed to include a reference to this in the text.</p> <p>With regard to the relationship between CIL and Section 106 and their relevance to different sites the Borough Council will produce a Planning Obligations</p>

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		<p>assembly and the associated infrastructure burdens. The burden of infrastructure must remain relevant, proportionate and proficient for sustainable development delivery.</p> <p>In supporting paragraph 5.13 we are pleased to see that it is recognised that Section 106 may still be relevant to some developments as opposed to CIL. This we propose should however be more explicitly stated as relevant to in particular, but not exclusively, strategic sites which need a site specific review to ensure delivery and viability.</p> <p>It is important that the Local Plan and any future charging schedule is clear what is Section 106 development or CIL, otherwise there is a danger of double charging for payments, making development unviable. The charging authority should... set out those known site-specific matters where Section 106 contributions may continue to be sought.</p>	<p>and Developer Contributions Strategy which will provide further clarification on this issue. It also aim to demonstrate that there is no actual or perceived double-counting.</p> <p>It is proposed to reference this document in the Local Plan with the relevant link.</p>
A30/39	Beaulieu Properties LLP (Savills)	<p>It is queried as to whether the Council are suggesting a £zero rate for CIL on strategic sites; this would be strongly supported.</p> <p>In respect of justifying a lower or £zero rate for strategic sites where appropriate, paragraph 34 outlines "Charging authorities can set differential levy rates for different geographical zones provided that those zones are defined by reference to the economic viability of development within them. In</p>	<p>Comments relating to CIL need to be made directly in relation to the Preliminary Charging Schedule where interested parties will be able to consider the evidence that supports. The levels of CIL itself will not be included in the Local Plan.</p>

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		<p>some cases, charging authorities could treat a major strategic site as a separate geographical zone where it is supported by robust evidence on economic viability."</p> <p>If CIL is blindly allocated to all development, there is a danger that some of the key strategic sites, which require significant enabling and on-site infrastructure, may not come forward for delivery.</p>	
Omissions			
A13/2	Portsmouth Water	It would be helpful if the infrastructure section made reference to Portsmouth Water's Water Resources Management Plan 2009.	Such documents are referred to in the Infrastructure Assessment Report and Infrastructure Delivery Plan. The Local Plan includes links to such documents.
CHAPTER 6: SPATIAL STRATEGY			
Introduction			
A20/1	Berkeley Homes (Southern) Ltd	Para 6.3: Object - the wording should reflect paragraph 14 of the NPPF of the presumption in favour of sustainable development. Removal of the word 'general' in the last sentence is therefore necessary.	The word 'general' has been included in Paragraph 6.3 as Paragraph 14 of the NPPF includes some exceptions including numerous caveats as a footnote 'for example those policies relating to sites protected under the Birds and Habitats Directive;...designated heritage assets; and locations of risk of flooding or coastal erosion. It is therefore considered that the word 'general' reflect this position.
A30/10	Beaulieu Properties LLP (Savills)	Para 6.4 Support - supports the recognition that the Gosport Waterfront's redevelopment would stimulate the local economy.	Support welcomed.
Policy LP3: Spatial Strategy			
Overall strategy			
A30/11	Beaulieu Properties LLP	Para 6.7 Support the recognition that there are limited options to locate new development in the	Support welcomed.

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	(Savills)	Borough due to its built up nature and other constraints. It is positive that it is recognised that there will need to be some 'chess playing' to rationalise sites by relocating some uses to new more efficient locations thereby freeing up the redevelopment of other sites, such as at the Waterfront, for other uses.	
Proposed quantum of employment floorspace (point 1)			
A19/1	PUSH	Support - The policy sets out employment floorspace targets for the Borough up to 2029 and is broadly in line with the figures set out in the 2012 PUSH strategy. PUSH's strategy states that Gosport should provide for 84,000m ² employment floorspace between 2011-2026 and the Local Plan provides for 84,000m ² employment floorspace to 2029; however a total of 88,000m ² floorspace has been identified. The same figure is used over a longer time period due to some uncertainty in the amount of employment floorspace identified. This is considered to be a sensible approach.	Support welcomed
A31/9	Lee-on-the-Solent Residents Association	6.12 – B8 floorspace – Warehousing generally produces few jobs but contributes substantially to road congestion. This sort of development should be avoided.	<p>It is considered that B8 floorspace will not be a dominant form of employment floorspace in the Borough due to other parts of the sub-region being more accessible to the motorway. It is also recognised that distribution uses can have low job densities although in some case can be important as part of wider employment site.</p> <p>Development of the proposed 84,000 sq.m for B1,B2 and B8 uses set out in the Spatial Strategy (LP3) will</p>

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			need to be considered together with the site specific policies and Policy LP16 relating to Employment Land. The Borough Council in accordance with the NPPF aims to seek an efficient use of land for employment purposes without being overly prescriptive.
Proposed quantum of residential development (point 1 and supporting text)			
A13/3	Portsmouth Water	The proposed number of new houses and their location is consistent with Portsmouth Water's plans. Individual sites may need local mains reinforcements but Portsmouth Water will work with developers to deliver this.	The consistency of the amount of new housing and their location is acknowledged. The requirement for developers to work with Portsmouth Water is recognised in the relevant site specific policies and Policy LP2 relating to Infrastructure.
A19/2	PUSH	Support - The Local Plan includes a housing target of 2,700 to 2029. The PUSH figure is 2,550 to 2026. If the annual rate was extrapolated then the Local Plan figure should be 3,060 to 2029. The Local Plan has actually identified 3,067 additional dwellings in order to provide flexibility in case some sites do not come forward. This figure is broadly in line with the requirements in the PUSH strategy.	Support welcomed. Housing figures to be revised to reflect the extrapolation of the figure in the South Hampshire Strategy (2012).
A18/2	A resident	As stated, the figure of 2,700 new houses satisfies Government requirements, but I would be surprised if it takes into full account the current economic situation within the Borough or nationally.	The Plan covers the period to 2029 and consequently over this period the economy will improve. The sub-regional housing figures included in the South Hampshire Strategy (Oct 2012) have taken into account the economic downturn in 2008 and reduced the sub-regional figure accordingly.
A30/12	Beaulieu Properties LLP (Savills)	Para 6.17 The level of housing proposed is supported, but this should not be considered a ceiling. Through good design, there should not be a constraint on a higher number coming forward if the site's capacity and design permit.	The housing figure in LP3 is not necessarily considered a ceiling on development merely that the draft Local Plan itself makes provision for 2,700 dwelling. Indeed Table 6.2 recognises that the potential for over 3,000 dwellings has been identified. The housing allocation

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			figure will be revised to fully reflect an extrapolation of the South Hampshire Strategy This figure also needs to be considered in the context of Paragraph 14 of the NPPF which includes a general presumption in favour of sustainable development subject to specific constraints identified in the NPPF and the Local Plan (such as internationally important habitats).
A18/3	A resident	<p>The large amount of open space and countryside within the Borough and the proximity of the harbour and coastal areas are a very important consideration in buying a property here</p> <p>Further significant housing development will start to tip the balance towards Gosport becoming more urbanised, which will result in fewer people in better-paid jobs buying houses here and existing residents moving away from the Borough. This will be followed by an economic downturn in the Borough and will impact on many other of your policies and strategies.</p>	The Spatial Strategy aims to focus new development on under-utilised brownfield sites and thereby safeguarding open spaces within the Borough. Other policies in the Plan aim to protect heritage, landscape and nature conservation features as well as promoting good design. The Plan also aims to improve the economy of the Borough by encouraging a variety of economic uses on currently under-utilised sites.
A40/1	A resident	There should be a cap on housing development – inadequate health, education, transport and road system to support and meet rising needs.	The Government's NPPF presumes in favour of sustainable development. Evidence from infrastructure providers suggest that the proposed level of residential development can be supported by existing infrastructure or with some infrastructure improvements as set out in the Infrastructure Delivery Plan (secured by on-site improvements or developer contributions for off-site provision). The Borough Council when assessing applications for new development will consider not only any infrastructure constraints but environmental and social issues too in accordance with national and local planning policies.

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A31/10	Lee-on-the-Solent Residents Association	6.18 – Employment should take precedence over new housing. Additional houses will simply increase out commuting with the result of increased congestion on access roads and thus make Gosport that much less attractive for investment and job creating activities. See also 3.17 and Appendix 1 which shows the bulk of early provision of housing in the early stages of plan.	The residential development is required to meet local needs. The latest PUSH Strategic Housing Market Assessment demonstrates this need. The major sites identified for residential development will also enable the development of a number of brownfield sites. These sites by their nature are difficult to develop and the inclusion of residential on these sites will make it viable for other uses to be developed including a variety of economic uses creating new employment opportunities. It is expected that Daedalus will create significantly more jobs than residents.
A20/2	Berkeley Homes (Southern) Ltd	Table 6.2 Need to ensure that this figure is correct, as other paragraphs within the draft Plan do not accurately reflect the extant permissions at Royal Clarence Marina.	Table 6.2 is correct and includes the outstanding 186 dwellings at Royal Clarence Yard as at 1 April 2012 under the 'Existing Permissions'. The table will be refreshed for the Pre-Submission version to reflect the housing supply position as at 1 st April 2014.
Urban Area Boundary: Proposed amendment –south of Heritage Way(point 2)			
A27/1	Milln Gate Gosport LLP (Barton Willmore)	<p>Object to the inclusion of the eastern part of the 'Brockhurst Gate' [Civil Service Sports Ground] Site outside the UAB as this prevents the site from being developed unless it is proposed for appropriate recreational uses or development essential to the operational requirements of public and other essential services.</p> <p>To justifiably fall outside the UAB, land should therefore be (i): part of the countryside; (ii) required to maintain the open character; (iii) be of ecological value; and (iv) be of recreational value. The western part of the Site does not fulfil any of these functions.</p>	<p>For the consultation draft of the emerging Local Plan it was considered that this section south of Heritage Ways should follow the same line that had been adopted in the current Local Plan as there had been no significant changes to land uses on this site, nor the criteria used to determine the UAB. However officers did give some consideration to include the Sports Ground within the UAB, with the boundary running along Heritage Way at this section.</p> <p>After further evaluation in the light of this objection it is possible to conclude that due to the construction of the Heritage Way Industrial Estate to the east it could be</p>

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		<p>There is no material difference in landscape terms between the two components of the Site which would justify this approach. Taken in isolation, the eastern part of the Site does not fulfil any one of these functions and so should be included within the UAB (see objector's representation for Landscape Appraisal and conclusions)</p> <p>By including this site together with part of the DM land (see A27/2 below) on the opposite side of Heritage Way within the UAB would then offer a more robust, defensible and regular shaped boundary to separate this suburban area from genuine rural landscape to the north-east on the opposite side of Heritage Way. This would then avoid the current arbitrary boundary which serves no particular function when assessed against the Local Plan objectives for including land outside the UAB. A Plan for the amended UAB has been submitted.</p>	<p>considered that the site has a more urban than 'rural' feel particularly when taking account of the office buildings associated with DM Munitions to the north of Heritage Way; and the proposed development site (Frater House) and Gosport Leisure Park to the west.</p> <p>Consequently it is considered appropriate to include the open space within the urban area. Heritage Way would appear a more robust definition of the urban edge in this instance. Safeguarding the site as open space will help protect the setting of the adjacent Fort Brockhurst.</p> <p>Conclusion: After further consideration it has been considered appropriate to amend the boundary on the Policies Map to include the open space with the UAB.</p>
A27/2	Milln Gate Gosport LLP (Barton Willmore)	<p>Include land within the DM Gosport site within the Urban Area Boundary. A Plan for the amended UAB has been submitted together with a landscape assessment.</p> <p>By including this site together with part of the DIO land (see A27/1 above) on the opposite side of Heritage Way within the UAB would then offer a more robust, defensible and regular shaped boundary to separate this suburban area from</p>	<p>Following comments made as part of the consultation further review has taken place of this stretch of the urban area boundary.</p> <p>It is proposed to include the land suggested by Milln Gate associated with DM Gosport within the Urban Area. It is considered that this piece of land has a closer association both visually and in function with the more managed area immediately adjacent the DM Office buildings than the more open pasture type land</p>

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		genuine rural landscape to the north-east on the opposite side of Heritage Way. This would then avoid the current arbitrary boundary which serves no particular function when assessed against the Local Plan objectives for including land outside the UAB.	to the east.
Use of brownfield land (point 3 and supporting text)			
A26/5	Natural England	Criteria 3 of policy LP3, promotes the use of brownfield land for future development. Whilst we welcome this, consideration must be given to ensuring that the land is not of high environment value to be consistent with para 111 of the NPPF	Include a reference within the justification text in order to alleviate Natural England's concerns.
Proposed sites for residential development (point 3)			
Gosport Waterfront (point 3a)			
A36/1	Premier Marinas (Gosport) Limited (CBRE)	Welcome and support the identification of Gosport Waterfront including Gosport Marina as a key redevelopment opportunity in the Borough.	Support welcomed.
Haslar (point 3c)			
A18/4	A resident	Concerned over any residential development within the Haslar Peninsula (300 new units). The proposed plans for the Haslar area will result in direct losses of unimproved semi-natural grassland which occur there (of importance for plants and grassland fungi).	<p>Proposals for the development at the Royal Hospital Haslar site will need to include appropriate ecological reports as required by legislation. National and local planning policies protect areas of international, national and local importance on and within the vicinity of the Peninsula.</p> <p>Most, if not all, of the unimproved semi-natural grassland on the site is to be retained given the site's national importance as a Registered Historic Park and Garden</p> <p>However it is accepted that details of the management</p>

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			of the ecology of the site will need to be included as part of any proposal and therefore the justification text of the Haslar policy (LP6) can be amended to include an explicit reference to this.
A18/26	A resident	Proposed development at Haslar will lead to unacceptably high levels of recreational pressure on the Gilkicker Point area, which although not currently fully protected by having SSSI status, is an area of outstanding wildlife importance in the Borough and also in a county and possibly national context.	It is considered that Point 1c of the Policy would cover this issue as it relates to protecting and enhancing biodiversity interests on-site and within the vicinity. This could include sites such as Gilkicker. It is considered appropriate to mention such areas as part of the justification text.
Priddy's Hard (point 5)			
A18/5	A resident	I am particularly concerned over any further development of Priddy's Hard (100 new units allocated in Table 6.2)	<p>Development proposals at Priddy's Hard will need to consider their proximity to internationally important sites as set out in national and local planning policies including a specific reference in Policy LP9a which requires that proposals accord with the NPPF in relation to internationally important habitats.</p> <p>Planning proposals may need to be accompanied with a site specific Habitats Regulations Assessment to deal with particular site specific details. The in-combination effects of other developments in the area will need to be considered including the consideration of any measures which have mitigated any impacts from previous developments.</p>
Protecting and improving existing sites (Point 6 and supporting text)			
A37/2	Sport England	Sport England expects the Council to protect any existing sports facilities within the regeneration areas identified in policy LP3. Sport England wishes to be kept advised of any potential allocation for	Point 6 of Policy LP3, Policy LP34 as well as site specific policies for the Regeneration Areas aim to protect sports facilities. Sport England will be consulted on any planning proposals to lose such facilities.

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		development if it involves a playing field or other sport and recreation facility.	
Internationally important habitats (point 7 and supporting text)			
A29/2	Hampshire & Isle of Wight Wildlife Trust	Impacts from Recreational pressures Pleased to see the Councils commitment to the Solent Disturbance Mitigation Project (SDMP) and your commitment in 6.33 to revising the spatial strategy if necessary.	Noted
A18/6	A resident	6.32 to 6.34 -Assessment needs to look at potential impacts of recreational boat use in the harbour, to which Gosport has contributed to greatly in recent years due to the over-development of marinas around the Gosport waterfront.	Where a Habitats Regulations Assessment is required the impacts generated by that proposal will need to be fully considered in accordance with the Habitats Regulations. This includes any impact arising from the generation of additional recreational boat use.
Areas outside of the Urban Area Boundary (Point 8) : Specific sites- Qinetiq Fort Road Alverstoke			
A46/2	Gosport Society	This site is outside the urban area boundary, and is deemed unsuitable for development, although it could be used for recreational use, however, in order to protect the large area of open space surrounding the existing buildings, some protection in the Local Plan is required. We suggest that it could be added to the adjacent land of Stokes Bay Golf Club.	The large area of open space surrounding the existing buildings has protection in that it is outside the Urban Area Boundary and shown on the Policies Map as an 'Existing Open Space' and therefore protected by Policy LP35. It is the Borough Council's aspiration that this area could be made available for public use making a new link between Fort Road and Stokes Bay avoiding Fort Road.
Settlement Gap (Point 9 and supporting text)			
A17/1	A resident	Glad to see your concern to preserve the strategic gap between Lee and Gosport.	Support for the Settlement Gap is welcomed.
A31/27	Lee-on-the-Solent Residents Association	The Policies Map shows Settlement Gaps, which seem to be areas previously called Strategic Gaps. We would welcome clarification, especially as the term Settlement Gap does not appear in the Glossary.	The term 'settlement gap' has replaced the term 'strategic gap' as it is consider to more accurately describe the purpose of this designation as described in Section 10 of the South Hampshire Strategy (Oct 2012). Agree that it would be useful to include term in

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			the glossary.
Alver Valley (Point 10 and supporting text)			
A18/7	A resident	I agree with the policy of promoting recreation in the former gravel extraction areas in the Alver Valley, but would like to see some money spent and visible results soon.	A number of elements of the Country Park have been completed with further proposals currently being investigating as part of the Alver Valley Country Park Strategy. Parts of the site benefit from Natural England Higher Stewardship Level funding for habitat creation. Other parts of the site have seen improvements in leisure facilities. It is recognised further work is required as money becomes available to undertake significant further improvements to establish a functioning Country Park.
Other strategic green infrastructure (Point 10 and supporting text)			
A17/2	A resident	Browndown: Access to shingle is needed between Stokes Bay and Lee prom. However until MoD relinquish control of Browndown both sides of main road, much of what shown as possible is not public – will MoD release all Browndown?	The public currently do have access to both parts of Browndown either side of Portsmouth Road except on the limited occasions when the MoD are undertaking training. Public use of the northern Browndown site will be considered as part of proposals for the Alver Valley Country Park. The issue of public access will need to be managed in relation to the important habitats found on the sites particularly the SSSI. The Borough Council is not aware of any proposals for the MoD to dispose of the undeveloped parts of Browndown.
A17/3	A resident	Browndown Camp- Has the training camp been sold? To whom? It should become more open	The Borough Council understands that the Browndown Camp has been sold to a private company. The site is

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		space – if you allow building the strategic gap will be impaired.	outside the urban area boundary and consequently there will be a presumption against development with exceptions including recreational uses appropriate to its setting.
Omissions from the Spatial Strategy			
A15/5	English Heritage	Heritage criterion- Would like to see a reference to the historic environment in Policy LP3: Spatial Strategy, both for its own sake and as a hook for the welcome recognition in paragraph 6.25 of the opportunities to re-use historic buildings.	Point 2 of the policy refers to Policy LP10, which includes recognition of the importance of the historic environment, as well as other policies in the Local Plan which include those specifically relating to heritage assets (Policies LP11-13). However to overcome English Heritage's concerns it is proposed to include a specific bullet point relating to the historic environment.
CHAPTER 7: REGENERATING GOSPORT THROUGH THE DELIVERY OF HIGH QUALITY SITES			
A13/4	Portsmouth Water	The regeneration of sites within Gosport will allow the reuse of existing mains capacity released by the reduction in MoD activity.	Noted
Gosport Waterfront and Town Centre			
A42/1	A resident	More should be done on the hub of the town (ferry area) to make it attractive to people rather than leave it as a run-down and dirty frontage at the beginning or the end of your journey. Improvements could include a hotel with marvellous views of the harbour.	Agree that the waterfront needs to be regenerated. The Local Plan is designates the area for a variety of uses, which could include a hotel. Further details will be set out in a SPD. The Borough Council is currently working with partners to help deliver these objectives for the Waterfront.
A49/2	A resident	I regard the implementation of the Waterfront Development as being of prime importance to the improvement of Gosport's Front Door. In particular the new bus station area and the continuation of the Millennium Walk along the shore to connect with Royal Clarence Yard. The idea to recreate Clarence Square is brilliant.	Welcome support. Further details on these matters will be included in the forthcoming Supplementary Planning Document on the Gosport Waterfront and Town Centre

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Policy LP4: Gosport Waterfront and Town Centre			
Type and scale of development (Point 1)			
A36/2	Premier Marinas (Gosport) Limited (CBRE)	<p>Welcomes and support the identification of Gosport Waterfront, and therefore Gosport Marina, as a key redevelopment opportunity in the Borough.</p> <p>Also welcome recognition that Gosport Waterfront, and therefore Gosport Marina, has the potential to accommodate a range of uses, including intensified employment development, retail floorspace and other town centre uses and residential accommodation.</p>	Support welcomed
A46/3	Gosport Society	Support this policy for the regeneration of Gosport Waterfront and Town Centre. However we note that Gosport Waterfront is designated as a mixed use site. This needs to be very strongly emphasized in the Local Plan, and any attempt to depart from the policy, in favour of further residential development, should be resisted. Decisions to deviate from Local Plan Policy must be transparent to the public.	The regeneration of the waterfront through the development of a mix of uses is a key objective of the Local plan as set out in Policy LP4. The determination of future planning applications will be determined against the adopted policy and any departures from this would be explained in the relevant Board reports which are available to the public.
Employment floorspace (Point 1a and justification)			
A30/13	Beaulieu Properties LLP (Savills)	Support - Para 7.23 and footnote 65 are important points to note that existing employment densities are extremely low at 58.5sqm per person within the whole waterfront area even when compared to warehousing employment densities. This is a crucial part of the argument for relocating existing uses to new rationalised sites as currently existing sites are not being used to their full potential, whereas new premises will be provided at a much more efficient	Support welcomed

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A30/14	Beaulieu Properties LLP (Savills)	<p>density.</p> <p>Para 7.23 Object - The importance of marine-related employment to the local economy is recognised in this paragraph and its protection is noted. However, there may be a case for its loss if there is a net benefit in regeneration terms to the local economy through possible relocation.</p> <p>This however is not precisely how this paragraph is worded as this flatly safeguards these assets albeit it later talks about the relocation of these assets within the site. The slight contradiction in the wording needs to be removed.</p> <p>However, it is also felt that the current relocation possibilities are drawn too tightly in relation to Royal Clarence Yard. It may be that these employment uses can be relocated to another site within Gosport Borough or even within the wider South Hampshire Region as set out in Box 2.1. This would importantly ensure that the overall economic success of this region is secured.</p> <p>Marine businesses compete in an international market and to confine them to relocate internally within the Borough may be at the expense of the South Hampshire sub-region - a wider perspective is required to ensure they do not migrate abroad.</p> <p>However, and moreover, the compelling argument</p>	<p>It is the Borough Council's objective that the Waterfront should be a genuine mixed use site which utilise the site's important assets. This includes its access to deep water. This is vital in order to retain and enhance the Borough's marine sector, which is one of its key business clusters and supports other parts of the local economy.</p> <p>There does not appear to be any contradiction in the paragraph. It seeks to retain deep-water access at the site whilst giving developers the possibility to relocate/reorganise the facilities within the Waterfront site thereby demonstrating significant flexibility in relation to the development of the site. It therefore recognises that certain deep water access could be lost if sufficient provision is made elsewhere on the site (such as the land at the Retain Area at Royal Clarence Yard). It would also support the retention of existing of deep water access and the provision of new facilities at the Retained Yard as this will provide additional employment opportunities on the site,</p> <p>This approach is in line with its employment-led strategy and concurs with the Solent Waterfront Strategy which recognises that need to retain deep water provision to support the marine industry in the Solent. The importance of this part of Portsmouth Harbour for deep water access is recognised in the Strategy,</p>

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		<p>against restricting uses to only moving to Royal Clarence Yard is that neither Gosport Borough Council nor the other waterfront regeneration delivery agents control Royal Clarence Yard. Therefore this location cannot be designated or guaranteed as the only option if the policy is to be deliverable and not subject to ransom.</p>	<p>The Council's approach is also consistent with the NPPF which states that when drawing up local plans, local authorities should support existing business sectors.</p> <p>It would be contrary to the objectives of the Local Plan if important employment assets such as deep water access were lost given that it is a key reason for businesses to locate and expand in Gosport.</p> <p>The Borough Council accepts that some businesses may relocate to other sites in the Borough or sub-region but that does mean that deepwater access at this part of Portsmouth Harbour should be lost given its close proximity to the mouth of the Harbour and the Solent. Once lost to other forms of development it would be very difficult to re-use for marine industries requiring deep water access again.</p> <p>It is the Council's view that this site should not be developed at all costs particularly if that would result in the loss of deep water facilities at the site which cannot be reprovided within the wider Waterfront Regeneration Area. If the Retained Area at RCY is not released then the policy would aim to ensure that existing deep water</p>

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			<p>facilities are safeguarded and would continue to form an important part of the Gosport economy. It is proposed to clarify this intention in the justification text of the Local Plan.</p> <p>It is considered that the Local Plan is therefore provides strong protection for such an important asset which could be considered of national significance yet providing sufficient flexibility to relocate elsewhere within the Waterfront Regeneration Area and thereby allowing other parts to be developed for other uses.</p>
A32/1	MoD Defence Infrastructure Organisation	<p>Para 7.23 – Object - The explanation of LP4 as worded in para 7.23 is inconsistent with the wording in 2(a) and para 8.14. If LP4 seeks to grant permission for mixed uses and 8.14 recognises the key priority for the Borough to preserve and sustain its heritage assets then 7.23 needs changing.</p> <p>A suitable amendment will be the deletion of the word "primarily" and an extension of the last sentence...."if economically viable and consistent with the re-use of historic Listed buildings." An additional sentence should be inserted:- "Residential Uses will be considered:- a) to allow for the successful re-use of historic buildings where other uses would not be appropriate or viable; or b) if it can be demonstrated that an element of residential development is required to enable the development of other uses of the site in terms of</p>	<p>It is not considered that Paragraph 7.23, which seeks to re-use the Retained Area for marine related businesses to utilise the site's deep water access, is inconsistent with Paragraph 8.14 which recognises the need to safeguard heritage assets. It is acknowledged that the Retained Area includes a number Listed Buildings but this does not preclude their re-use for employment purposes given that they are industrial in nature. Indeed in many respects an employment use is more likely to protect the significance of these buildings more than other uses including residential. Once detailed proposals are submitted it will be necessary to consider the significance of the buildings and what, if any changes to the building are appropriate.</p> <p>It is considered that the Retained Area is very appropriate for marine uses with its deep water access and indeed would be the most appropriate location for other businesses within the Waterfront site to relocate</p>

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		<p>securing a viable scheme."</p> <p>Such a change of wording will be consistent with the wording expressed in LP6 in relation to Fort Blockhouse and accords with the economic and physical constraints pertinent to MoD's retained land at RCY.</p>	<p>to gain access to deep water facilities.</p> <p>It is not considered that the proposed wording (as used in Policy LP6 for Blockhouse) is appropriate in this case as the Waterfront policy sets out a significant amount of residential development. The phrasing in LP6 outlines a more restrictive approach to residential development unless it allows the successful re-use of historic buildings or is required to secure a viable scheme.</p>
Retail and other town centre uses (Point 1b)			
A30/15	Beaulieu Properties LLP (Savills)	Para 7.28 Support - The linkage that is noted between the potential for recreational facilities including bars and restaurants and the marina is important to the regeneration of Gosport.	Support welcomed
A50/1	A resident	<p>Concern that retail development at the Waterfront will not be in the interests of Gosport Town Centre. This approach differs to that at Daedalus where new retail is very limited to protect the interests of retailers in Lee-on-the-Solent.</p> <p>The development of the waterfront area is in danger of creating a self-contained ghetto with little or no benefit to the Town centre. Although the Plan suggest that strong links will be established between the Waterfront and the Town Centre , there is no indication of the form these links will take, or how they are expected to work.</p>	Retail evidence by GVA Grimley suggests that the Borough Council should take a pro-active approach for retail development within the vicinity of Gosport Town Centre otherwise it will decline in the face of competition from other centres and on-line shopping. It is widely acknowledged that trends are pointing to town centres as a destination for leisure activities: meeting and socialising, eating and drinking etc. Therefore to complement the town centre it is considered that the Waterfront can be designed in such a way whereby it can enhance this leisure offer with its harbour frontage and encouraging people to stay longer in the Centre. By attracting more people it can then encourage more people to visit the wider Town Centre. It is therefore imperative that the waterfront is designed to ensure strong links with the town centre so that both parts of

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			<p>the Regeneration Area can benefit, Further work will be included within the Gosport Waterfront and Town Centre SPD.</p> <p>As far as Daedalus is concerned research showed that even small retail development could have an effect on Lee Centre. Due to the characteristics of Daedalus and proposals that could arise retail development at Daedalus would ultimately compete with Lee Centre rather than complement it; whereas given the proximity and characteristic of the Town Centre and Waterfront there are many more opportunities to support each other For example both areas will largely be served by the same transport facilities (town centre car parks, the Gosport Ferry and bus interchange) and that the Town Centre already has a relation with the Harbour Frontage (Falkland Gardens, the Promenade).</p>
Residential (Point 1d and supporting text)			
A9/1	A resident	The number of dwellings to be allowed on this small site is far too high (700-900) resulting in an inappropriate density.	<p>The proposed development will accommodate a range of densities across the site. The higher end densities will be comparable with those of the existing Rope Quays development. In some circumstances providing the design is appropriate the site may be able to accommodate higher densities and total numbers.</p> <p>The remainder of the housing allocation can be accommodated on various sites within the Town Centre at comparable densities to the surrounding areas as demonstrated in the SHLAA.</p>

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			<p>The Gosport Waterfront and Town Centre is the most accessible part of the Borough given its position close to the hub of bus services across the Borough and beyond and the Gosport Ferry services with links to the national rail network and city centre services within Portsmouth itself. It is therefore appropriate to make the best use of urban land and include higher densities which can also support the Gosport Town Centre.</p> <p>It is important to note that the actual number of dwellings the resulting densities will be dependent on achieving quality designs which respect the waterfront character and the historic environment of this part of the Borough as well as other issues outlined in the Plan.</p>
A30/16	Beaulieu Properties LLP (Savills)	<p>Support the general thrust of this paragraph and the recognition that residential development is an important enabler to delivering benefits and the wider regeneration of the area, especially where this ties into the potential relocation of existing employment land to deliver wider economic regeneration. Nevertheless, clarification is sought on the wording used.</p> <p>It is noted that the site could accommodate 700 dwellings with a range of densities. This figure is supported but this should not represent a cap to the number of dwellings. The figure could go up with the design based exercise suggested to inform the future SPD.</p>	<p>It is noted that this representation supports the 700 dwellings figure at the Waterfront but that this should not be a cap.</p> <p>The Borough Council does not necessarily see the 700 dwellings as a cap on this site but considers this an appropriate level to meet its housing supply requirements whilst ensuring that the site is genuinely mixed use in nature accommodating a range of marine related and other employment uses, and a significant amount of town centre related uses.</p> <p>The Borough Council would consider higher figures if this met the overall objectives for the site of delivering a mix of uses and could be designed in such a way that was appropriate to its location.</p>

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		<p>It is noted that the 700 is part of a wider 900 units for the Gosport Waterfront and Town Centre Policy area, but whilst the SHLAA has suggested, according to footnote 66, a potential for 200 further dwellings, this is only indicative and given the nature of the Town Centre area we would suggest that this may be optimistic. This level should therefore also be able to be utilised in the Waterfront area and not only within the Town Centre area of the Policy boundary. In doing so the level of dwellings proposed could be up to 900, but this must also remain with the proviso that a full quality design exercise and market assessment could enable a greater number to come forward in totality.</p> <p>The figure of 700-900 dwellings should be seen as a guide, but not a ceiling on development. Should good design and efficient use of land as supported by the NPPF enable a greater quantum of development to come forward, this figure of 900 should not be seen as a finite cap. This could, in the event that it was seen as a cap, enable some sites to come forward early at high density and could preclude the future redevelopment of other sites that would also assist the regeneration of the Waterfront and Town Centre. This should be respected through the SPD that will be prepared for the area, where the absolute number should be derived through a quality design-led approach rather than tied to this current level/number.</p>	<p>The Borough Council recognises that this is an indicative figure but still considers that 200 dwellings can be accommodated in the Town Centre over the period to 2029.</p>

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Public realm (Point 1f and justification text)			
A30/17	Beaulieu Properties LLP (Savills)	Para 7.33 – Support the retention of Falklands Gardens and Walpole Park to aid the regeneration of the Town Centre.	Support welcomed
A46/4	Gosport Society	Para 7.33- Object to any reconfiguration of the original 1922 design of the Ferry Gardens, renamed Falkland Gardens, and request that the original design be protected in the proposed Local Plan 2011-2029.	Further detail will be included in the forthcoming Gosport Waterfront and Town Centre SPD. It is considered very important to retain an open space at Falklands Gardens and that it continues to function as it does today as a major focal point and an area for viewing, sitting, and meeting. However with proposals to redevelop the Bus Station forming a major part of the redevelopment of the regeneration proposals and the possibility of relocating the boatyard adjacent the Gardens (although this is dependent on the MoD releasing the RCY Retained Area) it may be necessary to redesign the Gardens. How this will be achieved at this stage is not known and will be subject to detailed consultation at a later date.
Location of development (Point 2 and justification text)			
Overall principle (Point 2 and justification text)			
A3/18	Beaulieu Properties LLP (Savills)	Para 7.12 - Support - It is positive that a number of existing uses in the area are recognised as providing the opportunity for redevelopment or intensification - either on-site or off-site (para 7.23). This inter-relationship between the different sites is important.	Support welcomed
A30/19	Beaulieu Properties LLP (Savills)	Para 7.13 Support - The views from Gosport across Portsmouth Harbour are an important asset to the Town and Waterfront regeneration that need to be used to their full advantage for maximum enjoyment.	Support welcomed
Royal Clarence Yard: Retained Area which forms part of the Gosport Waterfront (Point 2a and justification text)			

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A32/2	MoD Defence Infrastructure Organisation	With regard to the MoD's land holdings in the Borough, DIO is expecting to transfer the retained site at RCY to the Oil Pipeline Agency in April 2013.	The Local Plan covers the period to 2029 and it is understood that this site will become available for development during this time.
A18/8	A resident	Concern that the Borough Council is looking to develop 'underused MOD land' (para 7.12) for employment regeneration and housing. Ecological surveys have shown that green space within MOD landholdings in the Borough is largely of high nature conservation value (you do acknowledge this later in the document), so should not be developed or even considered for development.	It is acknowledged that brownfield sites including MoD sites may have ecological interest and other policies in the Plan address this issue. The reference in Paragraph 7.12 relates solely to the MoD land referred to as 'Royal Clarence Yard: Retained Area' and any proposals will need to undertake the appropriate ecological surveys in accordance with the relevant policies of the Plan (LP4, LP43-45)
General Principles (Point 3)			
Heritage issues (Point 3a, 4d and 4g and justification text)			
A15/6	English Heritage	<p>The Waterfront and Town Centre are historically sensitive sites, as recognised in paragraph 7.34. English Heritage therefore welcomes and supports general principle 3a) and Gosport Waterfront principles 4d) and 4g)</p> <p>We prefer "conserve and enhance" rather than "preserve and enhance" as terminology more consistent with the NPPF and recognises that sensitive change can take place without detriment to the significance of the heritage assets.</p>	Support noted. Amend to 'conserve and enhance.'
A15/7	English Heritage	We welcome and support the reference to further work being required to ensure that the anticipated 700 dwellings could be accommodated in a form which respects both the historic core of Gosport and the attractive Harbour frontage in paragraph 7.30 and the requirements for proposals to be of high	Welcome English Heritage support for this policy and acknowledge that they may wish to make comments when detailed proposals come forward.

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		<p>quality design in paragraph 7.35 and to respect the setting of the High Street and Royal Clarence Yard Conservation Areas in paragraph 7.48. We also welcome and support the promotion of improved appreciation and interpretation of the historic Harbour and its features in paragraph 7.52.</p> <p>We would hope that the rigorous application of these principles would ensure that the historical significance of the Waterfront and Town Centre is indeed conserved and enhanced, and that significance better revealed, by any proposed development.</p>	
A16/1	A resident	Para 7.34 and 7.35 – Support – It is very important to preserve Built Heritage in the area and Royal Clarence Yard in particular, being a resident of the area.	Support noted.
Transport Issues (point 3b)			
A24/1	Highways Agency	The Local Plan and Infrastructure Plan at present contain little information regarding required transport infrastructure, in particular for matters concerning the local and strategic highway network. The HA is concerned that Gosport Waterfront development could have an adverse impact on the SRN due to its location, scale, and proximity. Parts of the SRN around Gosport are currently experiencing congestion during the peak hours and at other times so any traffic increases at these junctions would be of concern to the HA.	<p>The Local Plan and the Infrastructure Delivery Plan includes the latest available information regarding deliverable transport infrastructure during the Plan period, as identified by TfSHIoW and HCC as Highway Authority.</p> <p>GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network.</p> <p>It is proposed to include a criterion in Policy LP4 to</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		Recommend that wording is inserted into Policy LP4 requiring the developments to mitigate the impact on the SRN in line with national policy.	reflect that if it demonstrated that the development will have an impact on the SRN or other parts of the highway network, such impacts will need to be mitigated.
A25/4	Hampshire County Council	In order to be consistent and that transport impacts are properly and comprehensively assessed, the Policy should require a Travel Plan to be produced as part of the criteria for planning permission with a similar description in the written justification.	The requirement for a Travel Plan is set out in Point 6 of Policy LP22. It is not considered necessary to repeat this requirement here as there are no particular site-specific reasons why additional emphasis is required within Policy LP4.
A25/5	Hampshire County Council	Criterion 1e- the reference should be ' a new transport interchange' and not 'exchange'	Agree- change accordingly
Flood risk issues (point 3c and associated text)			
A35/7	Environment Agency	Support 3.c) and 7.38 – 7.41. We would also recommend highlighting the significance of the Waterfront and Town Centre Regeneration Area in contributing to the overall strategy for reducing flood risk to the existing community over the next 100 years, and that any proposals that come forward will need to contribute positively to the Portchester to Hamble Flood & Coastal Erosion Risk Management Strategy. Paragraph 7.40 - very supportive of this section and encourage early discussions with ourselves regarding development at the Waterfront site. We would also recommend discussions are held with the Lead Local Flood Authority (LLFA)	Support welcome. Make reference in the text that measures to reduce flood risk in this Regeneration Area will contribute to the overall strategy for reducing flood risk to the wider community and will need to contribute to the Flood and Coastal Erosion Risk Management Strategy Also agree that early discussions with Hampshire County Council as the Lead Local Flood Authority (LLFA) is required. Amend accordingly.
Infrastructure (point 3d and associated text)			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A35/8	Environment Agency	Support 3d).	Support welcomed
A23/3	Southern Water	<p>Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from the development proposed at Gosport Waterfront and in the Town Centre.</p> <p>Southern Water is concerned that unless the need for local sewerage infrastructure is recognised in relevant site policies there is a risk that the necessary infrastructure will not be delivered in phase with the development.</p> <p>New and/or improved local sewerage infrastructure will therefore be required to serve the development, or separation of surface water which currently drains to the combined system.</p> <p>The need to protect existing on-site infrastructure also needs to be recognised in planning policies.</p> <p>We propose the following amendments to Policy LP4, under “General Principles”:</p> <ul style="list-style-type: none"> • <u>a connection is provided to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water;</u> • <u>future access to the existing sewerage infrastructure must be secured for</u> 	<p>Amend policy and justification text to identify the issue that there is insufficient capacity in the local sewerage system to meet the anticipated demand from the development proposed.</p> <p>Southern Water’s recommended text relating to the protection of on-site infrastructure is a more general point and therefore it is proposed to include in Policy LP40 relating to water resources, although a cross reference can be included in the justification text.</p>

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		<u>operational, maintenance and upsizing purposes.</u>	
A35/9	Environment Agency	Paragraph 7.42- suggest the first bullet point should read ' <i>Suitable flood risk management measures</i> '.	Amend accordingly
A35/10	Environment Agency	Paragraph 7.43 - strongly support the proposal to remove surface water which currently drains into combined system and drain it to an alternative system (preferably a SUDS system if appropriate). There is also a reference to the potential need to transfer flow to an alternative discharge point. We would be interested to know the options being considered	Southern Water advise that due to a variety of reasons that there is no longer a potential need to transfer flow to an alternative discharge. Consequently it is proposed to delete this part of the paragraph.
A30/20	Beaulieu Properties LLP (Savills)	Not clear who will be the delivery agent for the waterfront walkway.	The waterfront walkway will be incorporated within the design of the development and therefore it may be necessary to construct in phases as each part of the waterfront becomes available for development.
A30/21	Beaulieu Properties LLP (Savills)	It is important that all listed infrastructure is costed and forms part of the CIL viability	As part of its on-going work on producing a CIL Charging Schedule the Borough Council has considered the viability of development in key regeneration areas including the Waterfront taking account of initial estimates for infrastructure. The Charging Schedule will be subject to a separate stage of consultation and will be examined at the same time as the Local Plan in order that issues relating to viability can be considered.
Gosport Waterfront (Point 4)			
Deep water access (Point 4a)			
A30/22	Beaulieu Properties LLP	It is not clear which or all deep water facilities are being referred to. Whilst safeguarding access to	Due to the limited and finite nature of sites with deep water access it is important that such assets are

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
	(Savills)	<p>deep water facilities (4a) is important, this must also be seen as part of the overall comprehensive approach to the development of the Waterfront. Potentially through the SPD it could be illustrated that some deep water facilities are surplus to requirements and other uses may be more in keeping with the regeneration proposals with some uses being relocated to Royal Clarence Yard and other locations; this needs to be permitted through Policy LP4 rather than an outright protection of such access points.</p>	<p>retained wherever possible. The Solent Waterfront Strategy acknowledges the importance of sites with deep water access at this part of Portsmouth Harbour. The Gosport Waterfront site is considered particularly important given its proximity to the mouth of the Harbour and the internationally important sailing waters of the Solent.</p> <p>That said the Borough recognises that existing deep water facilities used along this stretch could be potentially reorganised to allow for other forms of development provided they are located elsewhere on the site. It is suggested that the Retained Area at Royal Clarence Yard could offer potential for this. If such reorganisation is not forthcoming it will be important to retain the existing facilities to safeguard existing business and allow for other marine businesses to operate in the future.</p> <p>The Borough Council therefore does not consider deep water access as surplus to requirements and considers that its policy provides sufficient flexibility whilst retaining important employment assets on the site which are one of the main reasons why business would want to locate here.</p>
A30/38	Beaulieu Properties LLP (Savills)	<p>Access to deep water facilities needs to be protected (4a) in as much as active marine uses that use these edge of water sites, must not be constrained by encouraging public access to the waterfront in all cases but only where appropriate taking into</p>	<p>Agree that deep water access and marine uses requiring the waterfront edge should not be constrained by encouraging public access to the waterfront and that health and safety and commercial operations must be considered. Paragraph 7.50 recognises this in terms of</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		consideration health and safety issues and commercial operations (4e)	where schemes are practical and appropriate. However this could be clarified further by some additional text.
A30/23	Beaulieu Properties LLP (Savills)	<p>Para 7.44 Object - Whilst the general thrust of this policy is supported, there is an objection at the final sentence that requires deep water access to be secured at the retained area at Royal Clarence Yard before development of existing employment sites with deep water access for other uses is permitted.</p> <p>These uses may be happy to move elsewhere within the South Hampshire sub-region. Requiring such operations to move to a particular location however is a form of ransom on developers of those existing sites, and therefore landowners will not invest in existing premises. This might give the operators no alternative option, and if they do not wish to move to Royal Clarence Yard alone, then the operators may instead move abroad - these marine operators act in a global market and are often not tied to the UK. Neither Gosport Borough Council nor the other waterfront regeneration delivery agents control Royal Clarence Yard.</p> <p>It is proposed that marine uses could be relocated to Royal Clarence Yard (Para 7.44). This is important as otherwise these uses may not be able to relocate and hence land will not be freed up for redevelopment/regeneration or provision of the walkway.</p>	<p>As stated above the Borough Council considers the retention of some form of deep water access at the Gosport Waterfront as imperative for the economic future of the Borough as it is a key reason for businesses to locate in Gosport given the limited and finite number of waterfront sites. This site is particularly important given its proximity to the mouth of Portsmouth Harbour and the internationally important sailing waters of the Solent. Indeed the importance of this stretch of coastline is recognised in the Solent Waterfront Strategy.</p> <p>The Local Plan does not require businesses to move to particular sites nor does it, or can it interfere with the locational choice of businesses which may wish to relocate elsewhere in the sub-region. Instead what it does is to protect employment assets such as access to deep water which could be used by other businesses should others relocate. This is considered an appropriate policy given the importance of the marine sector to the local economy and therefore protecting characteristics which businesses in this sector would require is sound.</p> <p>If the Royal Clarence Yard retained area is not forthcoming and it is not possible to relocate deep water facilities to that site the policy is clear that existing deep water access facilities will need to be retained. The</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>That said, Royal Clarence Yard should not be seen as the only opportunity as this ransoms development. Neither Gosport Borough Council nor the other waterfront regeneration delivery agents control Royal Clarence Yard. Therefore this location cannot be designated or guaranteed as the only option if the policy is to be deliverable and not subject to ransom. If local relocations elsewhere are not supported, this could push employers abroad.</p>	<p>retention of an important element of the marine economy is considered vital for the Borough's prosperity and losing such sites completely to a residential and retail-led commercial scheme is not considered desirable and is contrary to the objectives of the Local Plan.</p>
Contamination issues (Point 4b and associated text)			
A35/11	Environment Agency	<p>We support 4b) and Paragraph 7.45. We would suggest a change to the wording within Paragraph 4. b); to the following: <i>'...to ensure that there is no adverse impact on <u>the water environment</u>'.</i></p>	Amend accordingly
Public access along the waterfront (Point 4e)			
A2/2	A resident	<p>The loss of the term 'Millennium Walkway' is a very noticeable change from the 2006 map plan. A well-lit coastal walkway linking together the various areas from the Forton Bridge to the ferry terminal and beyond would be a huge attraction for tourists with cafes and shops along the way. We strongly feel that it should be an outstanding aim of the proposal which could be at the front of a new Marketing strategy. It should also be included <u>in the map</u> so that future developers realise its importance and understand their responsibility to provide it. Rope</p>	<p>Agree that a continuous Harbour walkway would help support the local economy. It is acknowledged that the term Millennium Walkway is no longer used in the text and a generic phrase such as 'public access along the waterfront' is preferred in this context.</p> <p>Part 4e and related paragraph 7.50 make it clear that any scheme will need to incorporate proposals to extend the public waterway along the waterfront in order to create a continuous public route along the Harbour. This is also the aim of Policy LP37.</p> <p>It has been considered that showing the precise route</p>

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		Quays has a walkway but it doesn't go anywhere so if all developers do likewise linking them together should not be too difficult.	on the Policies Map would be too prescriptive.
A2/3	A resident	Gosport needs something sculptural and iconic to really put it on the map (further suggestions included with original letter). It is considered that clearing up waterfront areas is necessary to achieve the high aesthetic standard the Borough Council is aiming for.	The Gosport Waterfront Policy (particularly part4d) aims to ensure that buildings and civic spaces are of a high quality to reflect it setting overlooking Portsmouth Harbour. It is considered that the design of buildings and any public art should complement existing features of Portsmouth Harbour including the Spinnaker Tower. It is considered that parts of the site will be able to support landmark buildings. Further details will be set out in the forthcoming SPD and dealt with as part of any planning application.
A30/24	Beaulieu Properties (Savills) LLP	<p>Support the provision of a waterfront walkway but it must be noted that this is at odds with retaining deep water access. If marine uses are retained, then the walkway will need to be able to divert around these for health and safety and operational reasons.</p> <p>If marine uses can not be located to Royal Clarence Yard land will not be freed up for the provision of a walkway.</p> <p>Paragraph 7.50 is supported as it covers the potential conflict between the provision of the continuous public walkway and the practicalities and appropriateness of doing so, which should include health and safety issues with regard to operational sites.</p>	See response to A30/38 above. Further amendment has been made to Para 7.50 to provide further clarification.
Falkland Gardens (point 4f)			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A30/25	Beaulieu Properties LLP (Savills)	Para 7.51 -Support - Falkland Gardens should be retained.	Support welcomed
A46/5	Gosport Society	Para 7.51 - Object to any reconfiguration of the original 1922 design of the Ferry Gardens, renamed Falkland Gardens, and request that the original design be protected in the proposed Local Plan 2011-2029.	Further detail will be included in the forthcoming Gosport Waterfront and Town Centre SPD. It is considered very important to retain an open space at Falkland Gardens and that it continues to function as it does today as a major focal point and an area for viewing, sitting, and meeting. However with proposals to redevelop the Bus Station forming a major part of the redevelopment of the regeneration proposals and the possibility of relocating the boatyard adjacent the Gardens (although this is dependent on the MoD releasing the RCY Retained Area) it may be necessary to redesign the Gardens. How this will be achieved at this stage is not known and will be subject to detailed consultation at a later date.
Biodiversity (point 4i)			
A35/12	Environment Agency	We would encourage that for consistency throughout the document the policies should read 'preserve and enhance' (see LP6) or 'protect and enhance' (LP8) rather than just 'enhance'.	Amend accordingly.
A35/13	Environment Agency	Paragraph 7.53 and 7.54– Early consultation with Natural England is advised.	Amend accordingly.
Omissions: Phasing			
A30/26	Beaulieu Properties LLP (Savills)	The issue of phased delivery of the Waterfront should be incorporated into the Policy and the future SPD.	The issue of phasing will be considered as part of the SPD.
Other development considerations			
A37/4	Sport England	Sport England expects the Council to protect any	The Borough Council is unaware of any sport facilities

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		existing sports facilities within the regeneration area.	(other than sailing-related) within this area. Sailing is to remain a key element of future site proposals. If any other facilities are identified Sport England would be consulted as part of any planning application.
Gosport Town Centre			
A2/4	A resident	Walpole Park looks like a very run down area to be avoided. It needs a real makeover– a water feature with sprays and some dramatic planting with more trees. It also would benefit from a well-designed sculptural adventure playground with ‘assault course’ appeal for older teenagers (they love ‘Go Ape’).	It is recognised that Walpole Park has an important role to play in improving the attractiveness of the Town Centre. Paragraph 7.33 states that Walpole Park has the potential for improvements to aid the regeneration of the town centre and improve the public realm.
Daedalus			
Policy LP5: Daedalus			
A35/14	Environment Agency	Overall we support and are pleased with the content of this policy.	Support welcomed
Proposed Uses			
Leisure and Recreation (Point 2b and supporting text)			
A48/1	Hovercraft Society; Model Hovercraft Association; and Association of Search and Rescue Hovercraft	7.77 –Although reference is made to the retention of the Hovercraft Museum, this simplistic statement does not recognise the unique hovercraft activity on and administered from the Daedalus site. It also does not recognise the use of the Museum site by the Hovercraft Society, Model Hovercraft Association and the Association of Search & Rescue Hovercraft.	It is noted that other organisations use the facility.
Residential (Point 2e and supporting text)			
A31/11	Lee-on-the-Solent Residents Association	7.83 – We are not convinced [by] an ‘open book’ approach with regard to the possible need for extra housing. The area around Daedalus has a good supply of accommodation, as do, further afield,	The Policy is clear that higher levels would only be considered in exceptional circumstances and that sufficient evidence is required through an open book approach. The Borough Council agrees with LoSRA

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		Gosport and Fareham. People do not always choose to live close to where they work. We endorse the proviso, "In exceptional circumstances" and would expect a clear, specific and compelling rationale before such a measure were taken. Moreover, houses provided should contribute to the Borough quota/target for new housing.	that a clear and compelling rationale would be required and that these would contribute to the overall target for new housing.
A47/2	A resident	<p>Para 7.81 – Object – Residential housing in Gosport is always too much/too many houses/no thought.</p> <p>Para 7.83 – Object "In exceptional circumstances". We all know that Gosport will always, always over-build.</p>	<p>The Borough Council is aiming to meet local residential requirements as well as to ensure that residential development can assist in regenerating brownfield sites in order to make them economically viable for a variety of uses including new employment opportunities.</p> <p>It is an established policy position that the Borough Council will only consider additional residential development than that set out in the Daedalus policy if a robust case can be made in terms of facilitating other economic development. An 'open book' approach would be required to ensure the need for such housing is required in viability terms.</p>
Development Considerations (Point 3)			
Built Heritage and Design (Point 3a and supporting text)			
A15/8	English Heritage	English Heritage welcomes and supports criterion 3a) of Policy LP5: Daedalus, and supporting paragraphs 7.84 and 7.85.	Support welcome.
Transport (Point 3b-3d and supporting text)			
A24/2	Highways Agency	The Local Plan and Infrastructure Plan contain no wording as to how the development may be accommodated on the SRN. The HA is concerned that Daedalus Strategic Area could have an adverse	The Local Plan and the Infrastructure Delivery Plan includes the latest available information regarding deliverable transport infrastructure during the Plan period, as identified by TfSHIoW and HCC as Highway

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		<p>impact on the SRN due to its location, scale, and proximity. Parts of the SRN around Gosport are currently experiencing congestion during the peak hours and at other times so any traffic increases at these junctions would be of concern to the HA. Recommend that wording is inserted into Policy LP5 requiring the developments to mitigate the impact on the SRN in line with national policy.</p>	<p>Authority.</p> <p>GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network</p> <p>It is proposed to include a criterion in Policy LP5 to reflect that if it demonstrated that the development will have an impact on the SRN or other parts of the highway network, such impacts will need to be mitigated.</p>
A25/6	Hampshire County Council	<p>A number of changes should be made to criterion 3 of this policy in order to ensure that transport / traffic issues are properly addressed:</p> <p>Sub-criterion d) – amend to read “...opportunities to improve public transport services <i>and infrastructure</i> to the site.....” (additional text in italics)</p> <p>Two new sub-criteria should be added to the end of criterion 3:</p> <p><i>h) a Framework Travel Plan and Delivery & Servicing Plan setting out how development of the site will be promoted based on a range of sustainable modes of travel, thereby reducing the number and length of sole occupancy car journeys and over reliance on the car is provided.</i></p> <p><i>i) necessary offsite transport measures are included that are concordant with the current strategy for Strategic Access to Gosport peninsula</i></p>	<p>Amend policy and justification text to reflect this representation. Further details have already been included in the Daedalus SPD.</p>
Biodiversity issues (Point 3e and supporting text)			

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A35/15	Environment Agency	We support the inclusion of Paragraph 3. e),	Support welcomed
A47/3	A resident	Para 7.95 – Support	Support welcomed
Environmental considerations (Point 3f and supporting text)			
A35/16	Environment Agency	We support the inclusion of Paragraph 3f) although we would suggest the removal of the words 'where appropriate' in 3. f)	Agree amend accordingly
A35/17	Environment Agency	Paragraph 7.96 of the supporting text could be amended to place greater emphasis on the need to incorporate Sustainable Drainage Systems into the site layout (subject to contaminated land considerations as already stated)	Include text in relation to Sustainable Drainage System which is consistent with the Daedalus SPD.
Infrastructure (Point 3g and supporting text)			
A13/5	Portsmouth Water	With the proposal for new road access points to the Daedalus site the need for new water mains should be discussed with Portsmouth Water.	This detailed element is included in the Daedalus SPD. Amend text to include a cross-reference to the SPD.
A23/4	Southern Water	<p>Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from the development proposed at Daedalus.</p> <p>Amend Policy LP5, under bullet point 3:</p> <ul style="list-style-type: none"> • <u>a connection is provided to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water;</u> • <u>future access to the existing sewerage infrastructure must be secured for operational, maintenance and upsizing purposes.</u> 	<p>More detailed information for developers to consider is included in the Council's Daedalus SPD. A cross-reference to the SPD is proposed. This is a slightly different response to Southern Water's other comments on site-specific policies as Daedalus benefits from a detailed SPD which includes further details about infrastructure requirements.</p> <p>In relation to the second point relating to access it is proposed to amend the text to include a cross reference to Policy LP40 which includes a reference to this issue.</p>

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A35/18	Environment Agency	Support the inclusion of Paragraph 3 g) and the inclusion of bullet points 4 and 6 in Paragraph 7.97	Support welcomed.
A37/5	Sport England	Sport England expects the Council to protect any existing sports facilities within the regeneration area.	This comment is not applicable to the Daedalus site as there are no functioning sport facilities on the site.
Haslar Peninsula			
A15/9	English Heritage	References should be to “registered” Park, not “listed” Park.	Amend accordingly
Policy LP6: Haslar Peninsula			
General Principles (Point 1)			
A47/4	A resident	Object – You know as well as I do that the words in the general principles will never be taken into account. You guys will just build and build and build	The principles contained in Policy LP6 will be key considerations when determining future applications on the Haslar peninsula. Any new build will need to respect the historic setting of the buildings and park land on the Peninsula and will need to address various constraints such as flooding and accessibility issues.
Heritage issues (Point 1a, 3a,3b4b,4c and supporting text)			
A15/10	English Heritage	Haslar Peninsula, is of great historic significance, as recognised in paragraphs 7.101, 7.102, 7.120 and 7.137. English Heritage therefore welcomes and supports general principle 1a), the second caveat in Royal Hospital principle 2e), principles 3a) and 3b) and the caveats in Blockhouse principles 4b) and c) i) of Policy LP6: Haslar Peninsula. We also welcome and support the supporting paragraphs 7.102, 7.132, 7.133, 7.134, 7.140, 7.144 and 7.146.	Welcome English Heritage support for this policy and acknowledge that they may wish to make comments when detailed proposals come forward.
Flood risk issues (Point 1b supporting text)			
A35/19	Environment Agency	Support the inclusion of Point1b).	Support welcomed.

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A35/20	Environment Agency	<p>It is not currently clear how the flood defences that would be required to maintain a safe access and egress route to and from the Haslar Peninsula could be funded.</p> <p>In order to provide resilience to funding uncertainties, you may wish to consider acknowledging that whilst not the preferred option for managing risk, particularly given the potential for vulnerable people as a result of the possible uses identified, there is a possibility that development on Haslar Peninsula could be reliant upon a robust flood response strategy.</p> <p>It should also be highlighted that this will need to be developed in conjunction with the Borough Council to ensure that it could be an appropriate and effective method for managing risk in the context of future funding uncertainties.</p>	Amend accordingly.
Nature conservation issues (Point 1c)			
A29/3	Hampshire & Isle of Wight Wildlife Trust	Support criteria 1c and the accompanying text sections 7.108 to 7.112 and the recognition of the recommendations in the accompanying HRA.	Support welcomed.
A35/21	Environment Agency	Support the inclusion of Point 1c).	Support welcomed.
A18/10	A resident	Concern about having 300 new residential units at Haslar due to the severe effects it will have on the existing grassland of high botanical value at the Hospital site (paras 7.99 to 7.112)	The Policy requires that biodiversity is protected and the justification text makes it clear that the relevant ecological assessments will be required. A number of amendments are proposed to the Policy and supporting text to make it clear that it is necessary to

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		A botanical survey will be required to identify any sensitive areas and find out what management is required.	protect the biodiversity within the site and that proposals will need to be accompanied with on-going management measures to protect and enhance the site's biodiversity.
A18/11	A resident	<p>Concern about having 300 new residential units at Haslar due to the knock-on effects from increased recreational pressure to the area, particularly by dog-walkers using Gilkicker Point.</p> <p>The potential for recreational pressure impacting wildlife habitats (including disturbance to birds) at Gilkicker cannot be underestimated. There has been a significant increase in visitors to the area, which must be due to new residents from other parts of the town, since within the local area there has been very little new development.</p> <p>This could be mitigated for by some forward thinking in conjunction with the Haslar Peninsula regeneration scheme.</p> <p>Currently the main problem is that all visitors are channelled to the fort and then walk over a relatively small area of coastal grassland beyond there. My suggestion would be:</p> <ul style="list-style-type: none"> • establish a public footpath between Gilkicker golf course and Haslar sea wall, around the northern side of Fort Monckton to give more options for visitors to walk circular routes around the area and take the pressure off the 	<p>The Policy requires that biodiversity in the wider vicinity are considered as part of any proposal. This includes considering in-combination effects with other proposed development in the area. This includes the need to consider internationally important habitats such as the SAC at Gilkicker as well as features that support the integrity of internationally important bird sites which include Brent Geese feeding sites outside of designated SPAs such as those grassed areas in parts of the Stokes Bay area.</p> <p>The detailed management of the Gilkicker area is beyond the scope of the Local Plan. The Countryside Officer has been provided with these comments for information.</p> <p>It is considered that Point 1c of the Policy would cover this issue as it relates to protecting and enhancing biodiversity interests on-site and <u>within the vicinity</u>. This could include sites such as Gilkicker. It is proposed to add a reference to nature conservation interests in the vicinity within the justification text.</p>

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		<p>Gilkicker Fort area. This will require people to walk around part of the margin of the golf course.</p> <ul style="list-style-type: none"> • The partly closed off car park beyond the eastern end of the golf course needs to be reopened to encourage more people to use it (it could be used to provide access to the Haslar area). • Areas of coastal grassland adjacent to the fort Monckton need to be incorporated into the scheme as public open space (they will first require a botanical survey to identify any sensitive areas and find out what management is required). • If any development is permitted at Haslar, then a wildlife management plan must be implemented at Gilkicker Point with the relevant consultation. No money has been spent on the sites management in recent years and the flower rich grassland has deteriorated. 	
A29/4	Hampshire & Isle of Wight Wildlife Trust	It is pleasing to see the accompanying text 7.112 recognise the identified SINC within Haslar Hospital and the need for on site ecological surveys. It is observed that this SINC is not included on plan 6 your diagram showing the Haslar Peninsula Regeneration Area. We therefore request that the council amend this map to show the SINC.	The SINC is shown on the Policies Map. The Policy aims to protect important habitats and species and specific reference to the SINC is included in the justification text. It is not proposed to show all designations on Plan 6 which aims to show what different areas make up the regeneration area as well outline key proposals and identify internationally and national important habitats.
A29/5	Hampshire & Isle	The accompanying HRA states in 6.311 that “ <i>The</i>	It is considered that Point 1c of the Policy would cover

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
	of Wight Wildlife Trust	<i>policy requires that sections of the Solent frontage are opened up to public access. While there are no SPA/Ramsar designations along this stretch, the southern seawall is a potentially important wader roost. Proposals to open up the route will require additional bird surveys and careful planning and design</i> ". The Trust would support this and request that the council establish a programme to undertake these surveys as soon as possible. This will ensure that a number of years of overwintering surveys can be undertaken to provide a more accurate understanding of the birds using this area.	this issue as it relates to protecting and enhancing biodiversity interests on-site and <u>within the vicinity</u> . This includes sites such as Haslar Seawall. It is proposed to add a reference to nature conservation interests in the vicinity within the justification text. Any bird surveys will need to be undertaken by any prospective developer to inform the application.
A47/5	A resident	7.110 & 7.111 -This Council only pays lip service to conservation – no measures will be taken to preserve and encourage wildlife.	The Borough Council takes its responsibilities to protect nature conservation very seriously and has been working with neighbouring authorities and other key stakeholders to consider ways to protect wildlife in the Borough as well as the wider sub-region which could be affected by development in the Borough in–combination with other development. When determining planning application nature conservation issues are considered very carefully and opportunities are taken to enhance it where appropriate.
Transport (Points 1d and 1e)			
A24/3	Highways Agency	Policy needs to include wording which requires assessment and mitigation of the impact of development on the SRN	The Local Plan and the Infrastructure Delivery Plan includes the latest available information regarding deliverable transport infrastructure during the Plan period, as identified by TfSHIoW and HCC as Highway Authority.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
			<p>GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network.</p> <p>Criterion 1e already states 'that any additional traffic generated by the development shall be within the capacity of the existing road network and should not compromise the safety of existing roads;' This would appear to address the Highway Agency's particular concerns regarding the SRN and this is reflected in justification text although it is proposed to make a reference for a transport assessment.</p>
A25/7	Hampshire County Council	In order to be consistent and that transport impacts are properly and comprehensively assessed, the Policy should require a Travel Plan to be produced as part of the criteria for planning permission with a similar description in the written justification.	The requirement for a Travel Plan is set out in Point 6 of Policy LP22. It is not considered necessary to repeat this requirement here as there are no particular site-specific reasons why additional emphasis is required within Policy LP6.
A32/3	MoD Defence Infrastructure Organisation	<p>Should consider the options of improving Haslar Bridge whether by way of CIL or S106 & S278 Agreements in the event that the re-use of Fort Blockhouse is compromised by inadequate access. Bridge improvements would be consistent with Policy LP22 para 4 where the provision of local and strategic transport improvements are specifically referred to.</p> <p>Para 1(e) should be deleted and para 7.115 reworded as follows "There may be opportunities to</p>	<p>It is considered that improvements to Haslar Bridge are not realistic (i.e. deliverable) and there are some doubts about whether it is desirable.</p> <p>HCC consider that proposed new development on the Haslar Peninsula should not result in significantly more traffic than that arising when the sites on the Peninsula were fully occupied.</p> <p>The existing bridge served the hospital and the peninsula as a whole adequately and is performing</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>enhance accessibility to Haslar peninsula with improvements to Haslar Bridge by way of the Community Infrastructure Levy or Section 106 or 278 Agreements in accordance with paragraph 10.24.</p> <p>Improvements at Haslar Bridge may not be an absolute necessity because the traffic studies will determine the impacts on the highway network relevant to the proposed development at the appropriate time but there ought to be some recognition of the potential requirement during the plan period.</p>	<p>satisfactorily today - so there is no evident necessity for improvement. Improvements can only be justified if the existing bridge is a restraint on the nature or quantum of development proposed in the Local Plan.</p> <p>The development proposed in the Plan is not of sufficient scale or importance to warrant public investment in a new bridge and associated road works. If so it will be necessary for developments to fund the improvements by whatever means possible. S106 Agreement may be the most appropriate given that contributions of a small number of developments (less than 5) would be used to fund infrastructure directly related to the development site.</p> <p>It is not considered that improvements to the existing single carriageway bridge could significantly increase capacity, although appropriate studies by the developer to support an application may need to consider this issue.</p> <p>A new two-way bridge could be provided as a replacement on the line of the existing bridge or, if it is considered essential to largely maintain traffic flow during the work, it could be built alongside and then the old bridge demolished.</p> <p>A cheaper, but more intrusive option, would be to build another single lane bridge alongside and retain the existing one. Either option with associated roadworks</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
			<p>and land acquisition will be very costly (estimate of £3million upwards). It is anticipated that individual developments, or even the cumulative redevelopment proposals for this area would be unlikely to generate sufficient funds and accordingly developments requiring more traffic capacity will not be viable.</p> <p>In addition to these issues the Haslar Lake is an internationally important habitat (SPA/Ramsar site) and consequently all the necessary habitat regulation assessment would be required to consider whether there would be an impact on important bird sets and whether such impacts could be avoided or mitigated.</p> <p>There are also a number of practical issues that would need to be considered including those set out below: A new bridge probably cannot be 'landed' on the north west side of the existing bridge without demolishing several of the key Haslar Marina buildings and acquiring the land as highway.</p> <p>The existing accesses to the military sailing establishment and marina (on the south side) are satisfactory with the present signal control and intermittent traffic flows. They may not remain so with higher speeds and volumes permitted in free flow traffic conditions (due to limited visibility caused by the bends). Additional expense will likely be required on land acquisition, alternative access arrangements to the sailing establishments and probably re-alignment of</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
			<p>Haslar Road through JSASTC.</p> <p>The present bridge influences traffic flows through Anglesey to the town centre. The creation of an improved link may bring undesirable and inappropriate increases in traffic to other roads in this locality, or may at least call for improvements elsewhere.</p> <p>The Borough Council is reluctant to indicate in the Plan that there may be a requirement for a new bridge during the plan period without some evidence that this is practical and acceptable in the wider context.</p> <p>In conclusion the need for the bridge has not been demonstrated and in any event it is unlikely to be affordable and consequently will not be promoted in the Local Plan.</p> <p>It is proposed that the Plan should state in the justification text that the scale of development on the Haslar Peninsula will need to be kept within the capacity of the current bridge and highway network.</p>
Contamination issues (Point 1f and associated text)			
A35/22	Environment Agency	We support the inclusion of Point 1f) and Paragraph 7.118 We are of the understanding that the borehole(s) that used to supply Haslar Hospital with water are no longer used; we would therefore recommend that any borehole(s) should be capped to prevent any contamination via this potential	This will need to be considered further as part of any planning application.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		pathway.	
Royal Hospital Haslar (Points 2 and 3)			
Scale and type of development (Point 2 and supporting text)			
A47/6	A resident	7.120 – Object – You guys will just destroy the building and its history and its place in the community.	The historic buildings at Haslar Hospital are of national significance and it is the Borough Council's responsibility to ensure that development on the site respects the significance of these buildings. It will be necessary to ensure that sustainable and viable uses can be found for the buildings in order that their integrity remains and that their future is secured for future generations.
Medical, Health and Care Facilities (Point 2a and supporting text)			
A47/7	A resident	7.122 – Support – Bring back the hospital	The Borough Council was a leading campaigner in trying to retain the site as a Hospital but could not prevent its closure. It therefore needs to ensure that the site is re-used to safeguard the future of the buildings and parkland. Following its involvement with other stakeholders in the Prince's Regeneration Trust's Enquiry By Design it has been considered that the best option for the site is to facilitate a 'care campus with a range of care, health and medical facilities. It is likely there will need to be some market housing on the site to ensure the wider objectives are viable.
Retail/community uses (Point 2c and supporting text)			
A47/8	A resident	7.126- Retail- Completely wrong. Can't you just leave the site?	The retail proposed on the site is of a very limited nature to serve the site and immediate neighbourhood. This will provided much needed facilities for the people of this part of the Borough including many with limited ability to travel further afield for basic items, due to the

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
			intention of including care type facilities on the site. Such uses would also bring some vitality to the site and act as a hub/meeting point as well as the potential to improve the viability of any scheme that comes forward.
Leisure and tourism uses (Point 2d and supporting text)			
A45/1	Our Enterprise CIC Ltd	7.128 - Haslar could contain more than one hotel offer, and commercial forces should determine what might work, a mix of more affordable business type hotel space with a wedding/conference focused hotel should be incorporated. The location adjacent the marinas make Haslar a very good location for this use.	It is considered that one hotel is sufficient in this location. It does rule out the provision of additional hotels but developers will need to undertake an impact assessment to demonstrate that there will not be any harm on the commercial centres.
Residential uses (Point 2e and supporting text)			
A45/2	Our Enterprise CIC Ltd	LP6 2e - A limit to 300 dwellings should be for open market or affordable units, and not be a predetermined number, but balanced against the overall mix for the site, and the transport and heritage limitations of the site. In particular, and residential C2, retirement or care uses that are clearly part of an assisted living or care package should be allowed over and above the 300 dwelling limit stated. In order to secure a vibrant new community a balance of all residential types is required on site.	The 300 dwellings is the anticipated number of dwellings of market and affordable housing (i.e those within the C3 Use Class). This figure does not include those that fall within the C2 category which includes residential care homes, nursing homes and hospitals. For the avoidance of doubt it is proposed to include '(Use Class C3)' in Point 2e and paragraph 7.129.
A18/9	A resident	Would support the area used for some employment and a small amount of housing (see comment A18/10 for concerns for higher numbers). It is a good opportunity to extend public access to a little more of the Gosport coastline.	Support for employment and the extension of public access along the coast is welcomed. The issue regarding housing numbers is considered with A18/10 below.
Heritage Issues (Point 3a)			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A45/3	Our Enterprise CIC Ltd	Planning permission should be granted to as soon as is practicable to any application which serves to preserve and allow restoration and enhancement of the listed buildings, in line with EH policy to reuse existing listed buildings.	The Borough Council agrees that if a suitable scheme is brought forward then planning permission should be granted as soon as possible in order to secure a long term future for the Listed Buildings at the Haslar Hospital site. Proposals will need to be determined with other considerations set out in Policy LP6 and other policies in the Local Plan. The conservation and enhancement of the Listed Buildings will be one of the key objectives when assessing a scheme.
Infrastructure issues (Point 3c)			
A23/5	Southern Water	<p>Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from the development proposed at Royal Hospital Haslar.</p> <p>Amend Policy LP6, under “General Principles”:</p> <ul style="list-style-type: none"> • <u>a connection is provided to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water;</u> • <u>future access to the existing sewerage infrastructure must be secured for operational, maintenance and upsizing purposes.</u> 	<p>Amend policy and justification text to identify the issue that there is insufficient capacity in the local sewerage system to meet the anticipated demand from the development proposed.</p> <p>Southern Water’s recommended text relating to the protection of on-site infrastructure is a more general point and therefore it is proposed to include in Policy LP40 relating to water resources, although a cross reference can be included in the justification text.</p>
Other development considerations			
A37/6	Sport England	Sport England expects the Council to protect any existing sports facilities on the site.	There are tennis courts on the site which detract from the historic park setting. Consequently the future of this provision will need to be considered further at the planning application stage.
Blockhouse (Point 4 and 5)			
Background			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A46/6	Gosport Society	Para 7.138 - The Listed Guardhouses are on the list of buildings at risk, and we request that they be noted in paragraph 7.138.	The Listed Guardhouses form part of the Haslar Gunboat Yard scheduled ancient monument which is specifically mentioned in Paragraph 7.137. It is proposed to add a footnote to this reference to mention that the Guardhouses are on the Buildings at Risk Register.
Type of development (Point 4)			
A32/4	MoD Defence Infrastructure Organisation	In respect of Fort Blockhouse, the MoD is currently uncertain on its plans for Fort Blockhouse and it will be more appropriate in para 7.136 to substitute "may" for "intends".	Amend accordingly
A38/4	Gosport4Sail Community Interest Company	With little or no facilities for teaching children sailing in the area, the Gosport Plan should support creating a training centre on one of the redundant MOD sites in the Haslar Marine Technical Park and adjacent lake. This will greatly enhance youth facilities in the area and create jobs - particularly in the 19-25 age group.	Policy LP4 clearly recognises the potential for Blockhouse to provide a venue for sail training (Pont 4a and Para 7.141)
A45/4	Our Enterprise CIC Ltd	Support - Blockhouse should be planned comprehensively, and in partnership with GBC and DIO, to achieve a plan led solution. In particular policy should support to integrated planned approach to the former Gunboat sheds (Qinetiq) and Blockhouse 3 to avoid piecemeal development harming the special nature of these once combined heritage sites. Any proposals should seek to incorporate training	The Borough Council would support the view that the release of Blockhouse should be planned comprehensively with the Royal Haslar Hospital site. It is proposed to amend text to make a greater emphasis of this point. Also it is proposed to amend the justification text to make reference to a comprehensive approach for planning the future of the Gunboat sheds and yard where opportunities arise.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		and education facilities complementing the uses currently at Hornet and JSASCT. Social and strategic goals should incorporate a functional transport interchange (water, cycle bus), and marine led education and industries.	The Policy acknowledges the potential to incorporate, and expand existing training and education facilities on the sites (such as JSASCT). The Policy includes potential measure to improve accessibility to the Haslar Peninsula
Development considerations (Point 5)			
A47/9	A resident	5 - If you do as good a job on this as you did on Gosport Railway Station, why not just come clean and admit that you want to rape the building and the area.	The Borough Council has statutory responsibilities to conserve the Borough's historic environment and it needs to find ways to reuse buildings which are sensitive and respect its significance, and secure its long term future. Consequently such schemes need to be well-designed and financially viable.
Protect existing sports field (Point 5c)			
A37/7	Sport England	Sport England expects the Council to protect any existing sports facilities on the site. Sport England supports the Council's intention to retain or seek replacement of the existing sports field within the Blockhouse site. Sport England wishes to be kept advised of any potential allocation for development if it involves a playing field or other sport and recreation facility.	The Borough Council aims to retain the sports field as open space and will consult Sport England in relation to future proposals on the site.
Haslar Marine Technology Park (point 6)			
A46/7	Gosport Society	The Gunboat Yard is a Scheduled Ancient Monument, and located on this site. We request that the Gunboat Yard is noted in paragraph 7.151.	Amend accordingly
Rowner			
Policy LP7: Rowner			
A35/23	Environment Agency	Pleased with and support the general scope of the	Support welcomed

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		policy.	
A13/6	Portsmouth Water	Portsmouth Water is already working with the Council on the redevelopment of housing at Rowner.	Noted
Transport issues (Points 4b and 4c)			
A24/4	Highways Agency	Policy needs to include wording which requires assessment and mitigation of the impact of development on the SRN	<p>The Local Plan and the Infrastructure Delivery Plan includes the latest available information regarding deliverable transport infrastructure during the Plan period, as identified by TfSHIoW and HCC as Highway Authority.</p> <p>GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network</p> <p>It is proposed to include a criterion in Policy LP7 to reflect that if it demonstrated that the development will have an impact on the SRN or other parts of the highway network, such impacts will need to be mitigated.</p>
A25/8	Hampshire County Council	In order to be consistent and that transport impacts are properly and comprehensively assessed, the Policy should require a Travel Plan to be produced as part of the criteria for planning permission with a similar description in the written justification.	The requirement for a Travel Plan is already set out in Paragraph 7.162. A cross reference to Policy LP22 will further emphasise the need that a Travel Plan is required to support a planning application. A specific criterion in Policy LP7 relating to a travel plan is therefore not necessary.
Flood risk issues (Points 4e)			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A35/24	Environment Agency	Pleased with the inclusion of 4. e. Recommend that the word 'may' is replaced with 'will' in the last line of Paragraph 7.166 as this is required within the NPPF and Policy LP46.	Amend accordingly
Biodiversity issues (Points 4f)			
A35/25	Environment Agency	Pleased with the inclusion of 4f) Recommend that in 4. f) it should place an obligation to both protect and improve biodiversity.	Amend accordingly
Infrastructure (Points 4g)			
A35/26	Environment Agency	Pleased with the inclusion of 4 g).	Support welcomed
A37/8	Sport England	Sport England expects the Council to protect any existing sports facilities on the site. Sport England wishes to be kept advised of any potential allocation for development if it involves a playing field or other sport and recreation facility.	After considerable consideration since the Davenport Close site was identified for built leisure and recreation facilities in the Gosport Borough Local Plan Review (2006) it has been clear that it would be unviable to develop a facility on the site to replace the dilapidated and disused swimming pool complex on the site. Instead the site needs to be redeveloped to ensure that it does not detract from the wider regeneration proposals. Over the past few years there have been number of improvements in local recreation provision which reduces the need to retain a facility on this site. These include a high quality BMX track and adventure playground close-by within the Alver Valley, provision of Sure Start and youth club facilities and the redevelopment of the former Holbrook Leisure Centre as the new Gosport Leisure Park.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
			The other sporting facilities in the Regeneration Area relate to sports pitches which are protected by the Local Plan policies.
Alver Valley			
Plan 8			
A31/12	Lee-on-the-Solent Residents Association	Not all the proposals for Alver Valley are shown on the Map on page 71	It is not the intention of this particular Plan to show the detailed proposals only those of major significance. Such as the Gateway facilities and the car park on the western side. The Alver Valley Country Park Strategy provides more details.
Background			
A31/13	Lee-on-the-Solent Residents Association	There is no mention of the community involvement of various groups including us with the Countryside Officer from GBC. A pathway to a notice board, wood sculpture, bench and access right across to the old lorry road and pathways around the park all have resulted from a funds bid from Viola from LoSRA. Also there are regular events involving community groups.	The involvement of local group is indeed important. Amend accordingly.
Policy LP8: Alver Valley			
A26/6	Natural England	Natural England is generally supportive as it seeks to promote the area as a Country Park and enhance the green infrastructure network within the area (although express particular concerns see A26/7 & A26/8).	The general support is welcome. NE's particular concerns are addressed below (A26/7 & A26/8)
A29/6	Hampshire & Isle of Wight Wildlife Trust	The Wildlife Trust welcomes the inclusion of this policy. It is pleasing to see such a positive approach to increasing the amount of open space within the borough.	Support welcomed.

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A35/27	Environment Agency	We support this policy especially its consideration of flood risk, contamination, infrastructure and biodiversity issues. We welcome the policy wording in LP8 and strongly agree that the Alver Valley is a major asset for the Borough.	Support welcomed.
A46/8	Gosport Society	Support the creation of the Alver Valley Country park (objections to particular elements outlined below)	Noted
A47/10	Jan Graham	Support	Support welcomed
Provision of Country park facilities (Point 2)			
A31/14	Lee-on-the-Solent Residents Association	It is not clear how you access the Country Park Gateway Facilities" on the eastern side of the park either on foot or by car.	The Alver Valley Country park strategy provides more details.
A6/1	A resident	<p>Object to Country Park facilities at Grange Farm and associated areas (as shown on the Proposals Map) Policy LP8-2 and Para 7.177.</p> <p>Reasons for objection are:</p> <ul style="list-style-type: none"> • Home Heath has previously been designated as an open space and is a habitat that supports various wildlife; • Commercial uses could affect the amenity for residents of the new dwellings as part of the Alver Village regeneration project; • Proposals would harm Grange Farm and its setting which is a Grade II Listed Building; • Little Woodham Lane and its junction with Howe Road are totally unsuited for the increased volume of traffic and consequently properties fronting this road would be 	<p>Grange Farm has been identified as the prime location for visitor facilities and will enable the re-use of a number of historic buildings and adjacent land can be used for other facilities associated with a visitor centre. This includes a car park and a commercial facility such as a garden centre, which would utilise an area previously used as a garden nursery. The site has the potential to be accessed by vehicles although it is recognised that further work is required to secure a well-design and appropriate access point.</p> <p>Facilities will need to be well-designed to minimise the visual impact on the adjacent Listed Buildings as well as ensuring that the amenities of existing occupants are not significantly harm by the facilities. This could be emphasised further in the criterion of the Policy (although it is clearly stated in the justification text).</p>

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		adversely affected. The costs of any upgrade would be very expensive.	
A46/9	Gosport Society	<p>Object to the proposed Gateway Country Park Facilities around Grange Farm for the following reasons:</p> <ul style="list-style-type: none"> • Object to the change of policy for Home Heath field noted in the Local Plan 2006 as Open Space, and also part of a Strategic Gap. This would result in the loss of any important Open Space and an area of archaeological importance, in particular Saxon remains. A Gosport Borough Council survey shows that Gosport is short of Open Space. • The proposed Garden Centre on the ex-Nursery site, opposite the Listed Building of Grange Farm, would require further development. This would be unacceptable in this sensitive area. • Little Woodham Lane is too narrow to take the amount of traffic which could be produced from visitors and as a result of further development. There is no suitable site for car parking in this area. 	<p>Whilst the allocation on the policies map indicated that that the Home Heath area would be part of the visitor centre. It was not intention to imply that Home Health would be developed. The intention is retained the open space nature of the open area with some sensitively designed car parking at the western end with the remainder of the site retained as open space. Accordingly the allocation will be removed from the policies map and the indicative area for visitor facilities will be shown on Plan 8.</p> <p>Concerns were raised regarding archaeology and nature conservation would need to be considered as part of any planning application and would need to accord with the policies of the Local Plan. The site itself is not a designated nature conservation site and any application would need to accompany with an ecological assessment and the appropriate mitigation measures taken.</p> <p>The County Archaeologist has been consulted on the policies of the emerging Local Plan and raised no specific concerns regarding this site. The County Archaeologist would be consulted on any detailed proposals.</p> <p>It is considered proposals which would be associated with the Country Park would not necessary conflict with the objectives of the settlement gap, particularly on the</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
			<p>edge of the urban area. Indeed proposals for visitor centre facilities elsewhere in the Alver Valley could intrude on the open nature of the settlement gap.</p> <p>The Local Plan therefore aims to establish the principle of gateway facilities and it is accepted that significant consideration will be required to ensure the eventual scheme is well-designed and is of an appropriate scale which addresses the respondents concerns particularly in relation to:</p> <ul style="list-style-type: none"> • The setting of the Listed Buildings; • The amenity of local residents; • Ensuring the site is accessed by an appropriately designed vehicular access
A6/2	A resident	<p>An alternative site for Country Park Facilities should be considered at Alver Meadow</p> <p>This site (adjacent the BMX Track and adventure playground) is a far more appropriate site for the Visitor Centre, Car park and a café.</p> <p>It already draws large numbers of people but have no parking or other facilities. It would have direct access from Grange Road and would allow immediate access to the whole of the Alver Valley Country Park</p>	<p>The Council has consider other options for the location of the visitor centre but consider that re use of existing buildings at Grange Farm is best option. It is recognised however that at other sites the provision of smaller scale facilities such new or improved car parks should be considered. The site adjacent the BMX track is such a site that could be considered .</p>
A6/3	A resident	<p>The former nurseries had little regard to the character and setting of the area. This site should be cleared and returned to pasture or grassland which would then, together with Home Heath, form a</p>	<p>It is considered that a commercial garden centre could re-use this site in connection with visitor facilities at Grange Farm. The facility can be designed in such a way that would improve the former nursery site.</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		corridor connecting The Wild Grounds to Carters Copse. This corridor would greatly enhance the Biodiversity of the area.	
Development considerations (Point 3)			
Habitats and biodiversity (Point 3a)			
A26/7	Natural England	<p>Concern that the supporting text states: “The provision of formal recreation facilities, primarily in the form of sports pitches is also important.”</p> <p>The policy wording could permit (at the extreme) all non priority habitat within the site to be developed as, say, sports pitches, ignoring their potential as sites for habitat restoration. Whilst Natural England has no wish to preclude the development of sports facilities, careful consideration should be given to development which precludes restoration to priority habitat.</p> <p>We thus advise a change to the policy wording to: “a) they protect and enhance biodiversity including safeguarding a range of important habitats, and do not prejudice the restoration/recreation of such habitats on suitable areas.” It is not clear what value having “including safeguarding a range of important habitats” adds, so advise this is removed.</p>	Amend accordingly to overcome Natural England’s concerns However would need to add the word ‘important’ to provide further clarity
A29/7	Hampshire & Isle of Wight Wildlife Trust	Welcome the revision of the Masterplan and would be pleased to discuss this with you together with the ecological management of the Country park. The Trust would be keen to ensure that any development proposals do not impact with the sensitive areas of	<p>The offer of liaising with the Borough Council on the ecological management of the site is welcomed.</p> <p>The Council has now published an Alver Valley Country Park Strategy which was prepared having regard to the</p>

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		the Alver Valley Country Park. The policy should recognise the proposals to revise the masterplan and that development should be in line with this to ensure that development will not have detrimental impacts to the sensitive areas.	emerging local plan.
A18/12	A resident	It is important that the management plan which has been written for the Country Park is implemented without delay (detailed issues for concern relating to habitats on the site are detailed in the respondent's letter). GBC must seek expert ecological advice on which habitats and species should form the focus of wildlife enhancement in the Alver Valley and ensure that at least some segregation of recreational use is made and some provision is made to provide undisturbed habitats for birdwatchers, botanists and entomologists.	<p>The Council has now published an Alver Valley Country Park Strategy. Management plans have been produced for significant parts of the Alver Valley which benefit from Higher Level Stewardship funding which are managed for biodiversity. Further management plans are also being considered to ensure different forms of recreation are located in appropriate places within the Alver Valley to protect and enhance its biodiversity.</p> <p>The Borough Council will continue to seek support from the Hampshire Biodiversity Information Centre and Hampshire County Council Ecology Section, both of which provide services to the Council through a service level agreement.</p>
A26/8	Natural England	Concern that Policy LP8 will increase recreational pressure on the nearby Browndown SSSI. This SSSI is already suffering from recreational impacts. We advise that unless this allocation can demonstrate that it will not result in a detrimental impact on this SSSI, the plan will be unsound.	It is unlikely that the Alver Valley Country Park will generate significant visitor numbers to the Browndown SSSI. The perceived barrier of Portsmouth Road and the considerable actual barrier of a barbed wire fence that separates Browndown from Portsmouth Road would deter visitors from using this site. The proposed location of key visitor focal points, (such as visitor centre, car parking etc) are located some distance from the SSSI. The size and variety of the Country Park will be sufficient in most cases to contain most visitors. Visitors to Browndown SSSI can only currently access

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			<p>the south from its western and eastern coastal entrances. The vegetated shingle remains under MoD control and there are no known plans to change these arrangements.</p> <p>It is more likely that the Alver Valley could help deflect pressure, including dog walkers from the SSSI by attracting people to the facilities of the Country Park.</p> <p>Following a meeting with NE (1/7/13) and following e-mail (3/7/13- included with original submission) NE have accepted GBC's position and suggest a further amendment regarding dog use of the site affecting on-site biodiversity. The proposed amendment can be incorporated within the Local Plan.</p>
Heritage Issues (Point 3b)			
A15/11	English Heritage	English Heritage welcomes and supports criterion 3b) in Policy LP8: Alver Valley and supporting paragraph 7.181, although given the archaeological significance of the Alver Valley, we consider that it would be appropriate to make a specific reference to the need to take this into account within the policy itself	Support welcome- Amend accordingly
Pedestrian linkages (Point 3c)			
A17/4	A resident	Need a footpath across the Alver Valley from Rowner to Cherque Farm – N or S of the Wild Grounds	Agree that the linkages across the Alver Valley need to be improved. The Alver Valley Country Park Strategy addresses this issue.
Infrastructure requirements (Point 3d)			
A24/5	Highways Agency	Policy needs to include wording which requires assessment and mitigation of the impact of	GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport

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		development on the SRN	<p>implications of the proposed development on the strategic highway network.</p> <p>It is proposed to include a criterion in Policy LP8 to reflect that if it demonstrated that the development will have an impact on the SRN or other parts of the highway network, such impacts will need to be mitigated.</p>
Contamination issues (Point 3f and supporting text)			
A35/28	Environment Agency	Support Paragraph 7.185 and encourage early discussions to be held with ourselves in order to effectively remediate any contamination issues associated with potential sites.	Acknowledged that early discussions with the EA will be required.
Development considerations: Omissions			
A35/29	Environment Agency	<p>Propose that an additional bullet point be included within Paragraph 3 of the policy LP8; in relation to water quality to ensure no deterioration of the existing water body:</p> <p><i>'They do not exacerbate water quality issues and consider opportunities to improve the quality of water within the valley taking into account the Water Framework Directive.'</i></p>	Amend accordingly
A37/9	Sport England	Sport England expects the Council to protect any existing sports facilities on the site.	The proposals will involve the creation of new sport and recreational facilities rather than any losses.
Policy LP9a: Allocations Outside The Regeneration Areas: Mixed Use Site			
Priddy's Hard Heritage Area (point 1)			
A35/30	Environment	We support this policy.	Support welcomed.

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	Agency		
Biodiversity issues (point 1a)			
A26/9	Natural England	Concern over allocating Priddy's Hard for a residential and mixed use allocation as it lies adjacent to the Portsmouth Harbour Special Protection Area, Ramsar site and SSSI. Further assessment and mitigation measures will be required.	The Policy clearly sets out the requirement that any development would need to accord with the NPPF on internationally important habitats. This includes taking the appropriate avoidance and mitigation measures in accordance with the Habitats Regulations (as expanded in the justification text).
A29/8	Hampshire & Isle of Wight Wildlife Trust	The Trust would raise concerns over the regeneration of this area. This is an area that is known to be important for wildlife and any development will need to take this into account. The Trust has undertaken its own ecological data on this area and we would be pleased to share this with GBC.	<p>There have been other developments in the Priddy's Hard area which are immediately adjacent the remaining part of the original allocation. These developments included a range of ecological mitigation measures including a screening wall, the retention and management of various habitats with restricted human access, as well as measures such as a hibernaculum.</p> <p>It would appear that these measures have been successful. The screening wall hides dogs on the pavement from birds on the mudflats and also is a barrier which deters people (and dogs) from using the mudflats.</p> <p>As part of the Solent Disturbance and Mitigation Project bird surveys were undertaken at Priddy's Hard in Jan/Feb/March 2009 (SDMP: Winter Bird survey-1st year report (June 2009)). This work showed that Priddy's Hard was one of the busiest sites (with 14.8 events per hour) including with dog walkers and cyclists. However the study remarked that 'birds at</p>

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			<p>Priddy's Hard were hardly disturbed at all, despite high number of visitors.' It concluded that Priddy's Hard had the lowest disturbance rates despite high numbers of visitors.</p> <p>Depending on the nature of the proposals it is considered that an extension of this screening wall could be one such mitigation measure. Although further work would be required as part of any planning proposal.</p> <p>The Wildlife Trust comments appear also relate to other ecological interests and it is proposed to include explicit reference to other important nature conservation features in the Policy and justification text.</p>
Flood risk issues (point 1c)			
A35/31	Environment Agency	<p>Recommend replacing the term 'flood defences' with 'flood risk management measures', making reference to the Borough Council's 'Guidance for Developing in Flood Risk Areas' and highlighting the need for development to facilitate the delivery of the Portchester to Hamble Flood & Coastal Risk Management Strategy.</p> <p>There could be greater clarity with respect to the need to consider climate change when establishing the measures necessary to manage risk.</p>	<p>Use the term 'flood risk management measures and make reference to the Borough Council's 'Guidance for Developing in Flood Risk Areas'.</p> <p>Make reference to the need for development to facilitate the delivery of the Portchester to Hamble Flood & Coastal Risk Management Strategy, consistent with text used elsewhere in the Plan.</p> <p>The issue of climate change when establishing the risk is referred to in the NPPF and text associated with Policy LP46 and therefore not necessary to mention specifically in Policy LP9B</p>
Heritage issues (point 1e)			

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A15/12	English Heritage	Welcome and support the identification of heritage as an issue to be taken into account in the implementation of additional development sites (paragraph 7.188).	Support welcomed.
A15/13	English Heritage	Welcome and support the recognition of the historic interest of Priddy's Hard in paragraph 7.190, criteria e) and f) of Policy LP9A 1. Priddy's Hard Heritage Area and supporting paragraphs 7.192 and 7.195. However we prefer "conserve and enhance" rather than "preserve and enhance" as terminology more consistent with the NPPF.	Amend to use the term 'conserve and enhance'. Overall support welcome and acknowledge that English Heritage may wish to make comments when detailed proposals come forward.
Infrastructure (proposed additional point)			
A23/6	Southern Water	Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from the development proposed at Priddy's Hard Propose the following additional bullet points to Policy LP9A: <ul style="list-style-type: none"> • <u>a connection is provided to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water;</u> • <u>future access to the existing sewerage infrastructure must be secured for operational, maintenance and upsizing purposes.</u> 	Amend accordingly.
Policy LP9b: Allocations Outside The Regeneration Areas: Employment Sites			
Grange Road, Land south of Huhtamaki			
A26/10	Natural England	The protection of the woodland and provision of a cycle network link, this proposal is supported.	Support welcomed.

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Former Frater House site, Fareham Road			
Use of site (point 2)			
A27/3	Millngate Gosport LLP (Barton Willmore)	Millngate supports the identification of the Former Frater House part of the site for development and its position inside the UAB. However the development allocation should be extended to include the adjoining sports ground (see A27/6)	The Borough considers that the development allocation should exclude the adjoining sports ground as the site is considered an important asset to the Borough in terms of both a recreational facility and the role in plays within the town scape adjacent Fort Brockhurst (see response to A27/6 for further details). Consequently it is not considered appropriate to allocate this site as a development site, particularly as the Borough has numerous brownfield sites within the urban area which should be prioritised for development.
A27/4	Millngate Gosport LLP (Barton Willmore)	<p>Object to the site being allocated solely for B Uses as the market for B-uses in the Borough has been generally weak.</p> <p>To ensure the Local Plan has sufficient flexibility and can achieve its regeneration objectives it is recommended the wording of Policy LP9B is amended to replace 'Employment Use' with 'Economic Development' (Annex 2 of the NPPF) .</p> <p>It is acknowledged that the Plan's evidence base does not provide the justification to allocate the site for Main Town Centre uses. Whilst we do not believe the retail evidence base provides a robust or appropriate basis for the Plan's retail strategy, to ensure soundness we recommend the policy includes an additional requirement for any such</p>	<p>Given the site's proximity to the Gosport Leisure Park it is considered appropriate that the policy relating to the former Frater House site should be more explicit in allowing a greater flexibility of economic uses on the site.</p> <p>It is therefore proposed to allow a range of economic uses on the site subject to the relevant tests in the NPPF. This would require that the site is separated from the other two sites and forms a new policy relating to Economic Use sites.</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>proposals to be the subject of the Sequential and Impact tests and there to be a cross-reference to Local Plan policies LP16 and LP29. This will ensure conformity with the NPPF and that the policy is consistent with the evidence base. (Full details of justification is set out in objector's submission)</p> <p>Recommended Changes 2. Former Frater House site, Fareham Road <i>Development should be for <u>economic development</u> employment uses (B1, B2 and B8).</i></p> <p>Add new criterion: <i>Proposals for Main Town Centre Uses on the Site should be subject to the Sequential and Impact Tests and assessed against Policies LP16 and LP29.</i></p>	
A26/11	Natural England	Land at Frater House is a brownfield site previously used by the MoD. Natural England has no objection to this site.	Noted.
Heritage issues (point 2b)			
A15/14	English Heritage	English Heritage welcomes and supports criterion 2b) and supporting paragraph 7.204.	Support welcomed.
Access issues (point 2c)			
A25/9	Hampshire County Council	Criterion c) of this policy should be deleted along with written justification in paragraph 7.205 as this is covered by Policy LP22 - Accessibility to New Development - criterion 3	As HCC considers this issue is dealt with by Policy LP22 and considers this additional reference as not necessarily, it is proposed to delete this criterion. Add cross-reference to this Policy in the justification text.
Issues relating to adjoining open space (points 2d and e)			
A27/8	Milln Gate Gosport LLP	Delete criteria d) and e) and accompanying paragraph 7.203.	As the Borough Council maintains that that the open space should be maintained it is considered that criteria

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	(Barton Willmore)	This text is not required in the light of the objection to the open space designation of the adjoining land (see A27/6) and the proposal to extend the economic use designation to the whole site.	d and e should be retained to provide clarity to developers of what the Borough Council requires. In this case as the development site previously included pavilions it would appear reasonable that a new community facility should be provided to replace those previously lost. Similarly an understanding is required how the site will incorporate parking both for the economic use and the sports facility which will attract car use given its strategic importance.
Land at Aerodrome Road (point 3)			
A26/12	Natural England	Aerodrome Road is currently an undesignated green space area. Its development could affect biological assets as highlighted within the sustainability appraisal.	HBIC have undertaken an ecological survey on this site and have not identified any biological assets
Policy LP9c: Allocations Outside The Regeneration Areas: Residential sites			
Royal Clarence Yard			
A16/2	A resident	The development of Royal Clarence Yard <u>must</u> be monitored carefully. It is now 5 years since I bought my apartment and there have been significant changes to the building plans I was first shown by Berkeley Homes – building is denser, promised shops have not appeared – and even more building is planned which, in turn, will bring parking problems.	The original proposals for this site did have lower levels of housing but higher levels were allowed on appeal by the Planning Inspectorate at the expense of various economic uses. Any new proposals will currently be assessed against the policies of the Gosport Borough Local Plan Review (2006) and the guidance set out in the NPPF. Future proposals will be assessed against the policies in the Gosport Borough Local Plan 2011-2029 once this Plan proceeds towards adoption. These proposals will be subject to the required public consultation.
A20/3	Berkeley Homes (Southern) Ltd	Object - The draft policy currently allocates 80 dwellings at Royal Clarence Marina, however there	The allocation will be amended to reflect the unimplemented consent.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		are a total of 105 dwellings (blocks NM4/5, NM7, G1, G2 and G3) with the benefit of planning consent that have not yet been implemented and should therefore be included within the allocation. The Proposals Map should also be updated to reflect this.	
A23/7	Southern Water	Amend LP9C to recognise the local sewerage constraint at Royal Clarence Yard. The policy should state that planning permission will be granted provided that a connection is provided to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.	Policy LP9C lists a number of sites suitable for residential development and states that proposals need to accord with other policies in the Plan. It is considered appropriately to refer to Southern Water's concerns in the justification text rather than the policy in this instance. This is considered appropriate as the Royal Clarence Yard site has largely been developed and this is a small remaining area which has outstanding consent.
Stoner Close			
A26/13	Natural England	Natural England has no objection to the allocation of this site for residential use.	Noted
Wheeler Close			
A26/14	Natural England	Natural England has no objection to the allocation of this site for residential use.	Noted
Laphorn Close			
A26/15	Natural England	Natural England has no objection to the allocation of this site for residential use.	Noted
Policy LP9d: Allocations Outside The Regeneration Areas: Leisure Community and Open Spaces			
A37/10	Sport England	Supports the allocation of sites for new leisure facilities. Sport England would urge the Council to up-date its 2008 Study to confirm that the proposed	GBC has commissioned a new sports facility study which confirms that the proposed development will be sufficient to meet current and expected needs.

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		<p>developments will be sufficient to meet current and expected needs.</p> <p>Without an up-to-date needs assessment, there is no evidence that new leisure facilities are required. Therefore, whilst Sport England supports the provision of new facilities, there is a risk that this policy may be open to challenge and deemed unsound on the basis that it is not fully justified</p>	
Gosport Leisure Park			
A18/13	A resident	<p>Concerns regarding the loss of hedgerow as part of this development. This hedge constitutes a significant wildlife corridor in the Borough and should be replanted and reinstated.</p> <p>I point this out simply as an example of what can happen when the Borough does not have its own baseline data on species and habitats of nature conservation importance and does not employ an ecologist to check planning applications.</p>	<p>The application did not include (as evidenced by the submitted plans and biodiversity report) the need to remove all or part of this hedge, so the LPA is not guilty of ignoring this matter during the planning process.</p> <p>The Borough Council has service levels agreement (SLA) with Hampshire County Council which provide ecological advice on planning applications. It also has a SLA with the Hampshire Biodiversity Information Centre which provides baseline information on ecological assets in the Borough.</p>
Cherque Farm (Twyford Drive)			
A31/15	Lee-on-the-Solent Residents Association	Last sentence – We suggest the need for a traffic study before any of these options are adopted.	It is envisaged that the community facility would largely support the local community and thereby minimise the need for car use. However as with most community facilities car use will be generated by the proposal. Any such proposals would need to be accompanied by details of likely trip generation and proposed parking arrangement and would need to accord with Policies LP22 and LP23.

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Stokesmead			
A15/15	English Heritage	We welcome and support criterion 3b) of Policy LP9D: and particularly supporting paragraph 7.215. This identification of land where development would be inappropriate is consistent with paragraph 157 of the NPPF.	Welcome support
Additional leisure. community uses and open spaces			
Browndown Camp			
A47/11	A resident	Why can't Browndown Camp be preserved as a historical feature - only one left in the country – Butlins Style Holiday Camp perhaps? Living Museum?	The future of Browndown Camp remains unclear at this stage. Due to its location outside of the urban area boundary the Borough Council will consider recreational uses which are sensitive to its location. Suggested uses could be appropriate in principle at this site provided the detail accorded with the relevant policies of the Plan including those relating to design and nature conservation (given the site's proximity to a SSSI).
CHAPTER 8: ENHANCING A SENSE OF PLACE: DESIGN AND HERITAGE			
Overall heritage strategy			
A15/16	English Heritage	Overall heritage strategy: English Heritage welcomes and supports the Council's recognition of the importance of the Borough's historic environment in contributing to its distinctive character and the need to ensure the design of new development enhances the Borough's sense of place in paragraph 8.1, and the explanation of this importance in paragraph 8.2. We also welcome the description of the historical development of Gosport Borough in paragraphs 8.7 and 8.8 and welcome and support the summary of key issues in Box 8.1.	Support of the overall heritage strategy is welcomed.

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		<p>The Draft Borough Local Plan sets out a positive strategy for the conservation and enjoyment of the historic environment, reflecting the four bullet points set out in paragraph 126 of the NPPF, and a clear strategy for enhancing the built environment.</p> <p>English Heritage recognises that the Plan has taken the NPPF into account [subject to comments A15/17 & A15/19] and is consistent with NPPF principles, including identifying land where development would be inappropriate for its historic significance.</p>	
Cross-reference with other policies			
A22/2	HCC Archaeology	<p>In order to comply with the NPPF's definition of sustainable development as including the protection and enhancement of the historic environment (NPPF 7 and 9) and its assertion that the planning roles that ensure sustainable development should not be undertaken in isolation (NPPF8 and 9) the policies regarding the historic environment should be cross-referenced throughout the Plan including policies LP4 to LP9D, LP16, LP18 LP19, LP21, LP22, LP23), LP24 to LP37, LP38, LP39, LP41, LP42, LP46).</p> <p>In particular LP42 – Green infrastructure should explicitly reference the role that the historic environment has to play in enhancing and being enhanced by green infrastructure. For example through the preservation of below ground archaeological sites in green open space, the</p>	<p>All policies in the Plan need to be read in conjunction with each other. Cross references are made throughout the Plan where particular issues are explained in detail in connection with another policy. To include all the suggested cross-references would require cross references to many other policies in order to provide some consistency. It is considered that this level of cross-referencing would detract from the readability of the Plan.</p> <p>Issues relating to historic environment including archaeology are made throughout the Plan.</p> <p>It is proposed to amend text relating to green infrastructure to refer to archaeology.</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		provision of interpretation panels for historic features and the influence the historic environment may have on public art or landscape.	
Evidence Base:			
A15/17	English Heritage	<p>The Plan does not clearly or adequately set out the evidence base on which the historic environment strategy and policies are based, and that it is not possible therefore to ascertain whether this is adequate and up-to-date.</p> <p>None of the Evidence Studies listed on your website deal specifically with the historic environment and there is no indication within the Plan itself of the nature and extent of underpinning evidence.</p> <p>Whilst we do not necessarily dispute that such evidence exists, we strongly suggest that the next stage of the Local Plan makes explicit the nature and extent of the evidence on the historic environment on which its policies and site allocations are based. Reference should be made to the Historic Environment Record (HER).</p>	<p>Significant evidence has been used to inform the policies of the Local Plan which were included in the 'Further Information' Box at the end of the section including the Archaeology and Historic Building Record which is the Historic Environment Record in Hampshire.</p> <p>To make this more explicit it is proposed to include a new paragraph and information box at the start of the section.</p>
A15/41	English Heritage	English Heritage is about to go out to tender for a characterisation study of Gosport. Consider that there should be recognition of this study in future versions of the Local Plan – in paragraph 8.12 would seem appropriate. Mention could also be made of the English Heritage-funded Extensive Urban Survey report on Gosport, completed around 1999.	<p>Include reference in a new information box identifying various relevant studies as well as a reference in a later paragraph relating to local character.</p> <p>GBC has also commissioned a townscape study which will inform the next version of the plan.</p>
A22/3	HCC Archaeology	The Local Plan should carry an explicit reference to	Whilst mentioned previously in the 'Further Information'

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		the Hampshire Historic Environment Record as the relevant evidence base, relevant both to the preparation of the plan, the review of its sustainability and the development management process (NPPF 158 and 169).	box at the end of the section. It is proposed to include an information box near to the beginning of the section setting out the evidence used in the Local Plan with specific reference to the Archaeology and Historic Buildings Record (AHBR) which is the Historic Environment Record for Hampshire. In relation to the use of evidence in the development management process, the justification text of Policy LP11 includes detail of the need for evidence including the use of the AHBR. It is proposed to include a similar reference in the justification text of Policy LP12 and LP13.
Heritage Statements:			
A22/4	HCC Archaeology	Reference should be made in the text to Heritage Statements which should as a minimum have consulted the Hampshire Historic Environment Record (HER), and used appropriate expertise in assessing the importance, impact, opportunity and mitigation (further details set out in representation.	Include a new paragraph to heritage statements in the justification text of the design policy after references to design and access statement. Include additional references in text associated with policies LP11-LP13.
A15/21	English Heritage	Lack of reference to the potential need for a Heritage Statement to be submitted with an application where a heritage asset would be affected. Paragraph 8.16 may be an appropriate place to include this.	
Policy LP10: Design Principles			
A25/10	Hampshire County Council	The County Council supports the intention of requiring high quality design for all development within Gosport.	Support welcomed
A15/18	English Heritage	English Heritage welcomes and supports Policy LP10's requirement for new development to be well-designed to respect the character of the Borough's	Support welcomed.

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		distinctive built environment, including its heritage assets and their setting.	
A22/5	HCC Archaeology	Welcome the close relationship between Heritage and Design reflected in this policy as reflecting the advice of the NPPF.	
A26/13	Natural England	Policy LP10 seek to ensure development is well-designed to respect the natural environment and incorporates measures to protect and enhance biodiversity. These aspects of LP10 are supported by Natural England.	Support welcomed.
A31/16	Lee-on-the-Solent Residents Association	What is Good Design? It is very subjective. Concern that recently completed housing developments will not stand the test of time including materials used.	Agree that there is an element of subjectivity relating to design issues. The policy set out in the Local Plan is therefore based on key design principles based on national design guidance produced by the Government and CABE. It therefore avoids being overly prescriptive and advocating particular styles and tastes which can limit creativity and innovation as well as restrict more appropriate design solutions. The principles in the Local Plan are supplemented by further information in the Design SPD. The issue of materials is relevant and whilst the owner of a property will ultimately be responsible for the upkeep of property once developed there will be instances where suggested materials will not be appropriate for a particular location and could be considered as a reason to refuse.
Overall approach (point 1)			
A20/4	Berkeley Homes (Southern) Ltd	The wording of the first part of the policy seems to be unnecessary, and negatively worded, when the elements of 'good design' are then listed in part 2. For comprehensiveness, and avoidance of doubt,	Point 1 of this document is intended to be a strategic policy statement relating to design and how this inter-relates with the historic and natural environment. It is supported by English Heritage. It sets out the Borough

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		the policy should be re-worded to remove point 1.	<p>Council's overall approach to design. The negatively worded statement reflects Para 64 of the NPPF which is also negatively worded and states,</p> <p><i>'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'</i></p> <p>Point 2 relates to more detailed design elements used to assess planning applications</p>
Overall approach (point 1): omissions			
A15/19	English Heritage	<p>Lack of strategic heritage policy</p> <p>According to paragraph 8.3, this policy is intended to be the overarching policy for design and heritage, but it really only deals with design. If it is really intended to be an overarching, strategic, policy for the historic environment and heritage matters, then it needs to set out clearly the Council's intentions for these.</p> <p>Paragraph 156 of the NPPF requires Local Plans to set out strategic policies to deliver the conservation and enhancement of the historic environment, and Neighbourhood Development Plans only need to be in general conformity with the <u>strategic</u> policies of a Local Plan. Policies LP11, LP12 and LP13, on which we specifically comment below, are not strategic policies, and English Heritage therefore feels that, as</p>	<p>It is proposed to include an additional criterion within the Spatial Strategy Policy (LP3) which specifically deals with heritage assets and therefore this issue will be considered as a strategic issue.</p> <p>Include additional criterion and associated text in Policy LP10 to reflect the strategic importance of heritage issues.</p>

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		<p>drafted, the Borough Local Plan does not satisfy this requirement of the NPPF.</p> <p>The Plan therefore fails to contain include <u>strategic</u> policies to deliver the conservation and enhancement of the historic environment – we do not consider that Policy LP10 has sufficient regard to the historic environment to satisfy this requirement, and Policies LP11 – LP13 are detailed policies.</p>	
A15/20	English Heritage	<p>Paragraphs 8.11-8.14 English Heritage welcomes and supports paragraphs 8.11 – 8.14, although in respect of the reference to “heritage assets” in paragraph 8.13, it should be noted that there is a specific definition of “heritage asset” in the NPPF: “<i>A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.</i>”.</p>	<p>Include reference to the ‘What are Heritage Assets’ information box.</p> <p>Include NPPF definition of heritage assets in this box</p>
A15/21	English Heritage	<p>Paragraph 8.15 We assume the ‘specific guidance for development management purposes’ in the NPPF refers is that set out in paragraphs 128-136 of the NPPF. Our feeling is that this guidance should be set out within policies in the Local Plan, which it largely is in Policies LP11 – LP13.</p>	<p>Indeed the details in the NPPF have been included in Policies LP11-13. Consequently it is proposed to delete this paragraph and include a cross reference to these policies in an alternative paragraph.</p>
A25/11	Hampshire County Council	<p>Paragraph 8.19 The County Council supports the intention of requiring high quality design for all development within Gosport. In particular, the County Council supports the Borough’s intention to work with</p>	<p>Support welcomed.</p>

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		developers and stakeholders to devise design principles to guide development by development briefs. This will encourage partnership working to ensure that development proposals meet with the aspirations of both the Borough and the County Council.	
A25/12	Hampshire County Council	Design codes are most appropriate for large scale developments. Reference to design codes could imply that a significant level of detail will be required to accompany planning applications.	This paragraph relates to the Borough Council's overall approach to major sites which could include the use of masterplans, development brief or design codes. It is envisaged that the Borough Council would devise design codes in a very number of limited cases in the Borough.
A25/13	Hampshire County Council	It is important that the policy seeks a level of information commensurate with the type of application being submitted. The level of information required in support of an outline application requires clarification in order that the policy fairly represents the differences in the level of detail that is required to be submitted between an outline and a full application.	The Borough has revised its requirements for information to be submitted with planning applications.
A25/14	Hampshire County Council	In addition to the various ways in which good design can be achieved the Local Plan could also make reference to: <ul style="list-style-type: none"> • the PUSH Quality Places Model Supplementary Planning Guidance; and • the County Council's Manual for Streets Companion Guide 	Amend to mention the County Council's guidance. The PUSH document has formed the basis for the Borough Council's own Design SPD and consequently it is not necessary to reference in this section.
Design Principles (Point 2)_ Urban area			
A27/5	Milln Gate Gosport LLP	Amend the Proposals Map to include all the Brockhurst Gate site [Civil Service Sports Ground]	Considered as part of representations A27/1 and A27/2 above as part of the Spatial Strategy

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	(Barton Willmore)	the Site and part of the DM Gosport land to the north within the UAB (plan provided).	
Public Realm and Open Space (points 2b-2e)			
A31/17	Lee-on-the-Solent Residents Association	8.25- Is it necessary to have streets overlooked. We can understand the need for open spaces to be overlooked but are puzzled as to how streets can be overlooked other than by housing	The overlooking of streets by housing is an established design principle supported by Government guidance and helps to ensure that there is natural surveillance of residential streets by people living in their houses and consequently can act as a deterrent to potential criminals.
Ease of Movement (points 2f-g)			
A26/14	Natural England	Advise that policy LP10 is changed to read “g) it is accessible for pedestrians and cyclists and is well connected to public transport routes, <u>the public right of way network</u> and local facilities;” so as to be consistent with NPPF para 75. At present there is the danger that developments may be isolated from the public right of way network.	Policy LP37: Access to the Coast and Countryside is more appropriate to address the issue of links to the public rights of way network. It is not appropriate to mention links to the public rights of network in the context of Policy LP10 given its very limited nature within Gosport. However the criterion can be improved to refer more generally to linkages to the wider network of paths and cycleways in the Borough.
Heritage Assets			
Heritage Assets: What are heritage assets?			
A15/22	English Heritage	Paragraph 8.32 and Box 8.2 English Heritage welcomes this text but the NPPF contains a definition of heritage asset, which includes both designated assets and locally identified assets.	It is proposed to include the NPPF’s definition of heritage assets within the information box, ‘What are heritage assets?’, together with the previous information on designated and non-designated heritage assets.
Heritage Assets: Local Context			
A15/23	English Heritage	Paragraph 8.33 could helpfully specify the exact number of listed buildings in the Borough (stated as 534 in paragraph 3.34).	It is recognised that in some parts of the local plan a precise number has been quoted and in another part an approximate figure. In order to achieve consistency throughout the local plan it has been decided include an

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			approximate number
Heritage Assets			
A15/24	English Heritage	We strongly welcome and support paragraphs 8.34-8.35	Support welcomed
Policy LP11: Designated Assets: Listed Buildings, Scheduled Ancient Monuments and Registered Historic Parks & Gardens			
A15/25	English Heritage	We strongly welcome and support paragraphs 8.36-8.50 and Policy LP11.	Support welcomed
A22/6	HCC Archaeology	<p>The NPPF makes it clear that in planning terms nationally significant heritage assets should be treated the same whether designated or not (NPPF 139). To reflect this I would advise that the wording of this policy be altered to reflect this. For example: <i>LP11 –Nationally significant heritage assets including Listed Buildings, Scheduled Ancient Monuments, and Registered Parks and Gardens.</i> In addition other references to designated assets within the detailed wording of this policy should be altered to refer to 'designated heritage assets or those of demonstrably of equivalent significance'.</p> <p>In recent time Gosport has seen a number of previously undesignated but nationally significant heritage assets come to light many of which have subsequently been designated. It is therefore particularly important that local planning policy reflects national guidance in this regard.</p>	<p>Pont 5 of the Policy makes it clear that if a currently designated building structure or landscape is determined to be of national significance point during the planning process it will be assessed in accordance with the other elements of the Policy i.e. as a designated asset.</p> <p>It is proposed to slightly amend the title and make reference to undesignated assets as a footnote. It is also proposed to include specific justification text on this issue to accompany point 5.</p>
A31/18	Lee-on-the-Solent Residents Association	8.38 – Would it be possible for Lee Residents to become “statutory” consultees for Lee on the Solent?	Whilst the statutory consultees are set out by the Government and would not include local amenity groups. The Borough Council will continue to consult the Lee-on-the-Solent Residents' Association (LoSRA)

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			on planning proposals as set out in the Council's Statement of Community Involvement. It is proposed to specifically mention LoSRA in this paragraph recognising that the group also has a detailed interest in heritage issues.
Policy LP12: Designated Assets: Conservation Areas			
A15/26	English Heritage	We strongly welcome and support paragraphs 8.34 – 8.73 and Policy LP12	Support welcome
A15/27	English Heritage	We would welcome a reference to Conservation Area Appraisals and Management Plans in Policy LP12. A commitment to a programme of conservation area appraisals and management plans would be a welcome additional component of this strategy.	Add a new element in Policy and justification text relating to the issue.
A15/28	English Heritage	Would prefer “conserve and enhance” rather than “preserve and enhance” as terminology more consistent with the NPPF and as recognising that sensitive change can take place without detriment to the significance of the heritage assets in Policy LP12.	Amend accordingly throughout the document in reference to heritage issues.
A49/3	A resident	The creation of the Stokes Bay Conservation Area needs to be completed ASAP.	The Council will consider the need for further Conservation Areas outside of the Local Plan process.
Policy LP13: Locally Important Heritage Assets			
A15/29	English Heritage	We strongly welcome and support paragraphs 8.58 – 8.73 and Policy LP13.	Support welcomed
A15/30	English Heritage	we would prefer “conserve and enhance” rather than “preserve and enhance” as terminology more consistent with the NPPF	Amend accordingly

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A22/7	HCC Archaeology	<p>Welcome policy LP13 as a policy addressing locally significant heritage assets. Acknowledgement should be made that many archaeological sites are as yet undiscovered. I would advise the inclusion of an additional bullet point or addition to 8.63, for example: <i>There is also the potential for previously unidentified archaeological sites to be disturbed by development. Assessment for the potential for previously unidentified archaeological sites should be included within any heritage statement submitted.</i></p>	Support welcomed. Amend to make further reference to undesignated assets of local importance.
A22/8	HCC Archaeology	<p>8.66 – This bullet should be changed to reflect the fact that the Hampshire Historic Environment Record is a source of information on archaeological sites and can provide information regarding archaeological potential</p> <p>There should also be mention of the requirement for the inclusion of a heritage statement that assesses the impact of the proposed development upon the archaeological potential of the site. In some instances this may include a field assessment. However in some instances desk based assessment will be sufficient. In all instances it will need to include an archaeological impact assessment.</p>	It is proposed to include a reference to the AHBR and heritage statement in an earlier paragraph in this section
A22/9	HCC Archaeology	<p>8.70 – In addition to the reports submitted to the HER and the Records Office the archive should be deposited with an appropriate museum. Acknowledgement should also be made that the results of any investigation should be publically</p>	Amend accordingly

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		disseminated where appropriate in order to contribute positively to the sense of place, local character and distinctiveness (NPPF 126, 130 and 141)	
Policy LP14: Marine Parade Area of Special Character			
A15/31	English Heritage	English Heritage welcomes and supports the reference to and requirements for the Marine Parade Area of Special Character in Policy LP14 and supporting paragraphs 8.76 and 8.77.	Welcome support
A31/19	Lee-on-the-Solent Residents Association	1 a) – Some developments on Marine Parade are unsuitable to be a guidance or copied as acknowledged in 8.76 and in the relevant SPD.	It is accepted that this phrase could be misinterpreted. Consequently it is proposed to delete this criterion and instead rely on 1b (which will become 1a) which relates to achieving a good standard of design to reflect the qualities of the seafront. The SPD provides further information on this issue.
A31/20	Lee-on-the-Solent Residents Association	1 c) – Replace “adjoining” with “nearby” to include properties behind and in front of the proposed building.	Amend but use term ‘neighbouring;’
A31/21	Lee-on-the-Solent Residents Association	8.78 – SPD gives a measurement of 6 metres, but do we need this detail in the Local Plan? On the whole, we feel that – where there is an SPD – comments in the Local Plan should be minimal. Otherwise, there is always the possibility of confusion between the Local Plan and the SPD.	It is considered the very detailed elements to this Special Character Area are more suitable for the SPD.
Policy LP15: Safeguarded Areas			
No representations received			
CHAPTER 9: DELIVERING A PROSPEROUS ECONOMY			
A38/5	Gosport4Sail Community	Supporting initiatives to bring world class sailing events to Gosport will bring outside investment,	Amendments have been made to the Vision to reflect these points

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	Interest Company	create work for local businesses and hotels, create jobs, etc. Tourism is a major thrust of the plan. Therefore supporting major events which will attract thousands of tourists to the area should be encouraged.	
A40/2	A resident	Need to encourage and develop local employment	Agree- This is one of the key objectives of the Local Plan and includes proposals such as the Solent Enterprise Zone at Daedalus.
Policy LP16: Employment Land			
Employment Floorspace (Point 1)			
A31/22	Lee-on-the-Solent Residents Association	<p>B8 floor space – Warehousing generally produces few jobs but contributes substantially to road congestion. This sort of development should be avoided</p> <p>5 – Any housing should contribute to the total number of housing for Gosport Borough and not be additional to the quota figure. This also applies to 9.20 (See also comment on LP5, 7.83)</p>	<p>The Borough Council accepts that warehousing is a lower density form of employment. Sub-regional studies demonstrate that Gosport Borough is a less favoured location for such uses and therefore the market will generally identify other sites. However it is recognised that some types of B8 can achieve job densities equal to some forms of industries. It is also recognised that the potential to locate warehouse and distribution can also encourage companies to cite office and manufacturing jobs at a site as well. In these difficult economic times the Borough Council considers that it should take a fairly flexible approach on the type of employment uses that could locate on the Borough's employment sites and this approach is advocated in the Government's NPPF</p> <p>Agree any housing that should arise from this policy would count towards the Borough's overall figure.</p>
Proposed Employment Sites: HMS Sultan –Employment Priority Site (Point 2)			
A31/23	Lee-on-the-Solent	9.13 – We strongly support this para.	Support welcomed.

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	Residents Association		
Protecting existing employment sites (Points 4 and 5)			
A28/1	Trevor Lazenbury (Robert Tutton)	<p>Object- the Policy should be amended to generate a presumption in favour of mixed-use developments on existing employment sites.</p> <p>Policy LP16(5) suggests that planning permission may only be granted for a mixed-use scheme in exceptional circumstances and then when the viability of the previous business use has been shown to fail and ‘..employment densities equal to or greater than recent employment densities on site’ would be achieved’.</p>	<p>The Policy aims protect B1-B8 uses on existing employment sites but moves further than the existing Local Plan Review policy in that also enables the development of mixed uses on the sites for other economic uses (point 4) providing it is compatible with the site, creates similar levels of jobs and meets relevant tests relating to town centre uses. Point 4 therefore allows for mixed use development that the respondent is requesting.</p> <p>Point 5 also enables residential development on existing employment sites if it can help regenerate existing employment sites and create new employment.</p> <p>The Policy therefore aims to safeguard existing employment uses whilst incorporating flexibility to allow the development of mixed use sites. It is considered that a general presumption in favour of mixed use, particularly residential, on employment sites could potentially undermine the overall objectives of the Plan to create employment in the Borough. The Borough Council has identified sufficient land for residential development to meets its identified housing land supply.</p>
A31/24	Lee-on-the-Solent Residents Association	Any housing should contribute to the total number of housing for Gosport Borough and not be additional to the quota figure. This also applies to 9.20.	Agree- any new residential development resulting from this policy will contribute to the identified total housing number identified in the Spatial Strategy (Policy LP3)

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Policy LP17: Skills			
A1/4	A resident	Paragraphs 9.25-9.26: The Plan recognises the importance of education and states that a number of initiatives are in place to increase attainment. The Plan should state what the initiatives are and how they will be coordinated to achieve the stated objective. It may not be the job of the Council to provide the initiatives but if this is a key objective 'leaving it to unspecified others' is not sufficient.	Whilst the Borough Council agrees that it would be useful to set out specific examples of these initiatives which are provided by other agencies, it is acknowledged that many of specific projects operate over limited periods. Consequently mentioning these initiatives in the Local Plan would become out of date very quickly. Instead it is considered more appropriate to highlight the broader generic initiatives which need to be addressed via specific projects over the Plan period. However it is proposed to include a paragraph to set key specific organisations and types of organisation which can assist with these initiatives.
Tourism			
Policy LP18: Tourism			
A15/32	English Heritage	We welcome and support the recognition of heritage-related activities being tourism opportunities in paragraph 9.35	Support welcomed.
A30/27	Beaulieu Properties LLP (Savills)	Support - This policy is supported recognising the potential importance of leisure and tourism to the local economy.	Support welcomed.
Evidence Base			
A43/1	A resident	Para 9.40 – Evidence is weak for a number of reasons: <ul style="list-style-type: none"> • PUSH survey was outsourced and conducted over telephone • Survey area too large, 11 different councils. LP18 should be based on Gosport requirements • LP18 fails to show a target number of tourist 	The survey information for PUSH (2010) was used to ascertain on a strategic basis the need for hotels in the sub-region. It identified a specific need in Gosport. This confirmed an earlier hotel study for Gosport Borough which established the need for additional hotels. Indeed since the 2010 survey two hotels have been granted planning permission.

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		<p>beds required in Gosport</p> <ul style="list-style-type: none"> LP18 fails to show what type/mix of accommodation required 	<p>The PUSH Hotels Study identifies the need for two budget hotels delivering an additional 100 bedrooms. At the time of the Study there are 4 hotels with 48 rooms. Since the survey a new hotel at the Gosport Leisure Park has opened providing 64 bedrooms. The Study concluded that midweek occupancy levels in Gosport were high (75-80%), although weak at weekends.</p> <p>It is not the Council's intention to identify an upper target of tourist beds in the Borough. Instead it is an objective of the Local Plan to provide sites to accommodate at least 100 new beds. The 2010 study identified a potential for 608 bedspaces on brownfield sites which could take advantage of specific characteristics of certain sites (for example the Gosport Waterfront, Haslar and Daedalus). This will be largely up to the market to decide whether all of this will come forward if the operators consider the tourism industry can support this level. By allocating the site the Local Plan does not constraint this use and allows for flexibility in which sites may emerge as the most suitable.</p> <p>It is considered appropriate to include further information in the justification text (rather than just rely on the Employment Background Paper).</p>
Safeguarding existing tourism accommodation			
A43/2	A resident	LP18 will deter private houses and other premises from converting into tourist use if they see they are	LP18 aims to provide a flexible approach based on the principle of protecting tourism accommodation in order

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		<p>“locked in” with no way out ie. public houses, inns, rooms over restaurants, redundant shops.</p> <p>LP18 could encourage “illegal” tourism accommodation, in order to avoid being locked in, without mandatory building control, fire, and food hygiene requirements.</p> <p>LP18 is at odds with LP24. It fails to release Brownfield sites for affordable and aged homes. Look at the success of the conversion of various guest houses and hotels in the Borough converted to dwellings including sheltered housing.</p>	<p>to provide the basis for a developing tourist industry. The policy does enable the change of use of tourist accommodation if it can be demonstrated that the use is no longer viable. This approach was advised by Tourism SE in earlier consultations.</p> <p>However the objector makes a number of valid points and the Policy could penalise small guesthouse/B&B operators who wish to convert their property back to house. In some cases the policy would not necessarily give the required flexibility as the business may have been operating successfully but the other reasons why the owner wishes to change the use. As the objector points out the policy could also deter other potential businesses from entering the market if they felt that it would be difficult to convert to an alternative use.</p> <p>Therefore it is proposed to introduce a threshold for the policy whereby this policy would not apply to those with a certain number of tourist bedrooms (although planning permission would still need to be sought). The suggested level is 5 or less tourist bedrooms. This will enable flexibility within the guesthouse B&B market. Accommodation with 6 or more bedrooms would be in buildings normally outside the typical guesthouse B&B market and therefore it is considered should be safeguarded unless the criteria of the Policy can be met.</p>
Policy LP19: Marinas and Moorings			
A15/33	English Heritage	We also welcome and support the reference criterion	Support for relevant criteria welcomed.

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		1d) of Policy LP19: Marinas and Moorings.	
A26/15	Natural England	LP19: Marinas and Moorings promote the extension of marina and mooring areas provided the development does not harm internationally and nationally important habitats. Natural England notes the aim of the policy to protect the designated areas and support this commitment.	Support for relevant criteria welcomed.
A21/1	The Crown Estate	Support this policy. However, in addition we would propose that consideration is given to developing a new marina facility further along the coastline at Lee on the Solent. There is a substantial demand for further marina berths within the Solent area, and this location would be ideally situated between the River Hamble to the West and Portsmouth Harbour to the East, with direct sailing access to the Solent. Employment would be created within the marina, and with the addition of associated marine related activities on site.	<p>Support welcomed. Currently no proposals have been submitted and no evidence is available to satisfy the Borough Council that a new marina could be developed without impacting on the local environment including internationally important habitats in the vicinity (Ramsar/SPA). Consequently the Borough Council is not in a position to allocate a specific site for a marina proposal. It is considered that the current policy provides suitable clarity on how the Borough Council will consider future proposals recognising the potential benefits for the local economy whilst ensuring environmental issues are properly addressed.</p> <p>Proposals in the Solent would also require the support of the MMO as much of the site would be outside of the Borough boundary and consequently outside of its decision-making jurisdiction.</p>
A30/28	Beaulieu Properties LLP (Savills)	Support - This policy is supported, in particular the recognition of point (f) that such development should not constrain further development of the waterfront or access to other sites with the potential for development	Support welcomed
Policy LP20: Information and Communications Technology			

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A11/1	Mobile Operators Association (Mono Consultants Ltd)	Support for the inclusion of Policy LP20 within the Draft Local Plan as it facilitates telecommunications development and support its provisions which are generally in accordance with the guidance within the National Planning Policy Framework (NPPF) relating to both development planning and supporting communications infrastructure.	Noted
CHAPTER 10: IMPROVING TRANSPORT AND ACCESSIBILITY			
Evidence Base			
A24/9	Highways Agency	<p>The HA is concerned about Gosport BC's evidence base. Key concerns relate to the following:</p> <ul style="list-style-type: none"> • Both the Transport Assessment (2009) and the 2010 supplemental work do not consider in detail specific mitigation measures/infrastructure required to deliver strategic sites; • Concerns relating to the robustness and credibility of the transport evidence base; • Disagree with conclusions of the transport assessment supplemental report (2010) in that development will have a significant impact on Junction 9 (further details in representation letter). <p>Given the known capacity issues on the M27, the HA considers that without the provision of appropriate mitigation measures the Local Plan development in Gosport will have a material effect on the safe and efficient operation of the SRN.</p>	<p>GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network</p> <p>The local plan specifically highlights transport interventions that have been identified in the TfSHIoW Transport Delivery Plan, the HCC Gosport Borough Transport Statement and more recently Fareham & Gosport Transport Infrastructure Plan which have all taken into account the quantum of development proposed in the Gosport local plan</p> <p>See HCC comments below (A25/15)</p>

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		<p>For the next stage of the Local Plan the HA recommend that the measures identified in other studies including the Strategic Access to Gosport Study (StAG 2010-2026) are refined and set out in specific terms, in particular for supporting the key development sites in the Borough.</p> <p>Recommend that GBC draw together the various strands of the Evidence Base and supporting studies in order to identify specific mitigation measures and further assessment work for the SRN and also access to and from the M27.</p>	
A25/15	Hampshire County Council	The Highway Authority confirms that there is no requirement for the impact of the total proposed development on the highway network to be modelled as the peninsula's main access roads already experience congestion during the weekday peak period. In addition the Transport for South Hampshire's Strategic Access to Gosport Transport Strategy identifies a package of measures that are required to manage the existing and future traffic demands in a more sustainable manner. The package of measures is identified at paragraph 10.10 and Box 10.2.	Whilst this point is acknowledged in order to have an up to date robust evidence base GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network.
Policies Map/Plan 12			
A17/5	A resident	Your plan should show bus, cycling and pedestrian networks	This would be too detailed for the Policies Map and the various plans in the document (eg Plan 12). Other publications shows bus and cycle routes.
Local Context			
A25/16	Hampshire	Paragraph 10.7: The reference to "Delivering a	Amend accordingly

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	County Council	Sustainable Transport System" should be deleted as this is no longer government policy.	
A25/17	Hampshire County Council	Box 10.2: There is a lack of clarity in relation to "development of bus priority on existing and new routes including linkages with the BRT". This reference should either be deleted or more information provided on which routes the Council has in mind	Update to identify specific proposals in relation to improved linkages to the BRT which are included in the the TfSHIoW Transport Delivery Plan.
Policy LP21: Improving Transport Infrastructure			
Overall approach			
A24/6	Highways Agency	We support the stated objectives of the Policy LP21, namely to promote a sustainable and integrated transport system, in collaboration with relevant stakeholders, including the HA. However, following on from the above, in order to find the next iteration of the Local Plan sound, the HA will be seeking to understand how transport infrastructure will need to be improved or developed, in particular to support additional development related trips using the SRN.	These issues have been considered in the revised versions of the Infrastructure Delivery Plan and the transport background paper.
A25/18	Hampshire County Council	In criterion 1 of this policy the words " <i>and provide</i> " should be added after " <i>promote</i> ".	Amend accordingly.
A30/29	Beaulieu Properties LLP (Savills)	Object - Whilst the principle of reducing congestion is applauded, there needs to be care in punitive and restrictive parking policies as these will impact detrimentally on investment in Gosport. Whilst public transport improvements need to be in place before punitive restrictions, there will always be a demand for private car access. Private car ownership, it is	It is not considered that this policy would result in punitive car parking measures. The aim of this policy is to improve transport infrastructure and makes no reference that this would result in restrictive parking measures. Instead other policies in the Plan and the Parking SPD will aim to ensure that sufficient car parking is provided to serve the development which is

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		believed, has now reached its peak and so there will be a natural decrease in private vehicle activity.	appropriate for its particular location. It will be necessary to consider matters such as the mix of uses and the design of the development. It is acknowledged that as transport choice improves there is still a need for parking as people will still require a car for other trips.
A34/2	A resident	<p>The trend of increasing traffic between Gosport and external work areas (such as Segensworth and Whiteley) is very concerning - and highly unsustainable. The people of Stubbington are not amused by their roads being blocked morning and evening. Associated problems are wasted commuter travel time, air pollution, extra fuel use, fuel cost and personal health.</p> <p>Could you provide / improve a dedicated bus service to reduce car journeys? Have you got good enough travel / employment data to ask employers to relocate parts of their business to Gosport to reduce commute distances? Could more people spend time working at home, or is an employer's sub-office in Gosport? Could some people be encouraged or assisted to live closer to work?</p>	<p>In order to reduce out-commuting and congestion the Borough Council through partnership working and the implementation of its Local Plan aims to:</p> <ul style="list-style-type: none"> • Increase employment opportunities within the Borough to potentially reduce the need to out-commute. Such major schemes include the Solent Enterprise Zone at Daedalus; • Continue to work with transport infrastructure providers such as TfSHIoW and Hampshire County Council as the transport authority to improve public transport, cycling and pedestrian measures to create improved opportunities for people to travel by modes other than the car • Continue to work with the Highway Authority to improve the road network to improve journey times which can reduce the associated problems of air pollution, fuel consumption and costs. <p>Many of the specific measures mentioned by the respondent are already being considered/undertaken to reduce car usage.</p>
Lack of transport infrastructure			
A14/1	A resident	Improvements to employment needs and the	Measures are being taken to improve the road network

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		environment are a waste of time if nothing is done about the road system. There have been no significant changes in the last 40+ years. Other areas have seen improvements and Gosport is left out. The Council needs to fight for funding into order to break the road stranglehold and realise the town's great potential.	(such as Newgate Lane) which will make employment areas such as the Solent Enterprise Zone more attractive for investors which will create new jobs and potentially reduce the need to out-commute. There are limited opportunities to improve the road network on the Peninsula particularly as longer distance travel is limited by the capacity of the motorway junctions at peak time. Instead significant investment has been made to improve public transport (BRT) and cycling routes.
A40/3	A resident	Current road systems and network not adequate	
A18/14	A resident	The Plan does not give any clear examples of improvements or provision to be made for new transport links apart from the need to extend the rapid bus transport route.	Box 10.2 give details of committed projects. Web links have now been included to the relevant TfSHIoW and HCC documents which outline these schemes in further detail.
BRT			
A18/15	A resident	Support the extension of the BRT route	Support welcomed.
A25/19	Hampshire County Council	Paragraph 10.18 and 10.19 – Sentences should be amended to read ' <i>HCC and TfSH</i> '	Amend both sentences accordingly.
A25/20	Hampshire County Council	Paragraph 10.19 - The reference in this policy should be to " <i>Queen Alexandra Hospital</i> " not " <i>Queen Alexandria Hospital</i> ".	Agree amend accordingly.
A25/24	Hampshire County Council	Paragraph 10.23 A new second sentence should be added to this paragraph as follows: " <i>The future extension of the off road BRT route utilising the Fareham to Gosport dis-used railway line will continue to provide for cycles</i> ".	Amend accordingly
A4/1	A resident	Why has not more of the old railway line been shown as the BRT extension? On the sign it says it is to be extended at least to Military Road. There is space to	The Policies Map shows the extension as far as Rowner Road. The HCC have advised that this will be the likely extent of the BRT along the disused railway

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		easily divert the public footpath and cycleway.	line for the foreseeable future as further extension will not derive particular benefits. Instead improvements will be made to on road route to Gosport town centre (improvements at Brockhurst roundabout and Lees Lane)
A14/2	A resident	The new rapid bus system has made no noticeable difference to the traffic. In fact the bus link has caused more traffic jams as the A27 is now reduced to a single lane near Fareham station.	<p>The BRT provides an additional transport choice, with linkages to Fareham Railway Station providing further travel options for Gosport residents. It is the provision of these options and further development of the network that will enable people to make an increasing number of trips without the use of the car. Without these options local residents would become more car dependent.</p> <p>The latest figures identify a 16% increase in bus patronage on the services replaced by the Eclipse (BRT services) with a 6% general increase in bus patronage in the Gosport peninsula (Transport Delivery Plan TfSHIoW 2013).</p>
A32			
A25/22	Hampshire County Council	The above proposed highway improvement (A32/Wych Lane junction) should be identified on the Proposals Map as a highway improvement requiring land safeguarding.	HCC now consider that the land for this proposal should be included on the Proposals Map. Amend accordingly.
A14/3 A18/16	A resident	<p>The A32 needs to be improved to support proposed development (A14, A18). Suggestions include:</p> <ul style="list-style-type: none"> Widen into dual carriageway. There is plenty of room to do it without compulsory purchase with the exception of some front gardens (A14). 	Neither the HCC as the Highway Authority or TfSHIoW, responsible for delivering strategic projects, have identified major improvements on the A32, although measures are being introduced to improve flow such as junction improvements. Other transport improvements have been delivered or are proposed to increase transport choice which will have some benefits for the

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			A32. It is considered that the proposals outlined in the Transport Delivery Plan 2012-2026 (TfSHIoW) and the Gosport Borough Transport Statement (HCC 2012) will support the new development together with the Local plan strategy for employment-led development which will provide greater job opportunities within the Borough.
Newgate Lane:			
A25/23	Hampshire County Council	Peel Common/Newgate Lane corridor should be allocated on the proposals map as a highway improvement with the caveat that " <i>land will be safeguarded when the requirements are known</i> "	Due to proposed amendments to the Newgate Lane improvement scheme, HCC would now like land to be safeguarded for this scheme. Amend text and policies map accordingly.
A14/4 A18/16	A resident	Newgate Lane needs to be improved to support proposed development (A14, A18). Suggestion include: <ul style="list-style-type: none"> widen into a dual carriageway for its whole length- There seems to be little point in widening just a small section of Newgate Lane near Longfield Avenue / Speedfields Park. (A14) flyovers at its junctions with Rowner Road and the HMS Collingwood / Longfield Avenue area the traffic would flow into Gosport at a much improved rate, and the Daedalus site would look far more attractive to employers. (A14) 	HCC are currently preparing for a number of significant improvements on Newgate Lane which will help improve access to the Peninsula including the Solent Enterprise Zone at Daedalus.
Stubbington Bypass			
A44/1	Hallam Land	The Plan's transport infrastructure proposals are	The Borough Council supports the provision of a new

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	Management Ltd (Barton Willmore)	<p>woefully inadequate to cope with development proposed in the Boroughs of Gosport and Fareham.</p> <p>Recent improvements to the road network and the BRT will be inadequate to deliver the proposals at Daedalus which are needed on order to deliver much needed jobs and economic growth in the Borough and wider sub-region.</p> <p>The Borough Council supports a Stubbington Bypass so why is it not mentioned in the Plan.</p> <p>The Stubbington Bypass should be included in future drafts of the Plan which sets out the clear need for a Stubbington Bypass and the means of delivery within the Plan period supported by an up-to-date and robust evidence base.</p> <p>[See representation for full justification]</p>	<p>access road (sometimes referred to as the Stubbington Bypass). Mention of the need to safeguard a route for this (which is outside of Gosport Borough) was mentioned in Para 10.26 of the Consultation Draft.</p> <p>It would not be appropriate to mention this scheme in the Policy or show on the Proposals Map because the land required for any future proposal is not within Gosport Borough.</p> <p>The Fareham and Gosport Transport Infrastructure Plan (Autumn 2013) identifies the Stubbington Bypass as strategic highway improvement. Accordingly Box10.2 in the local plan will be amended</p>
Walking and Cycling			
A25/38	Hampshire County Council	<p>Countryside Access Plans (see also A25/37) aim to enhance to the local sustainable transport network. Therefore request that the District include reference to the CAP within section 10 of the local plan.</p>	<p>Include reference to the Countryside Access Plan with appropriate web link.</p>
Developer provision of new transport infrastructure –funding (Point 2)			
A25/25	Hampshire County Council	<p>A new paragraph is required in this section of the Plan to explain how developer contributions for transport infrastructure will be gathered using the Highway Authority's Transport Contribution Policy</p>	<p>The Borough Council proposes to introduce CIL at a similar time to the Local Plan being adopted. Whilst HCC's concerns are understood it is considered not necessary to amend this section as the proposed text</p>

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		until CIL is adopted. A suggested form of wording is as follows: <i>"Until CIL is adopted transport Infrastructure will continue to be funded by developers in accordance with the Highway Authority's Transport Contribution Policy."</i>	would be out-of-date very shortly/immediately after the Local Plan is adopted. If for whatever reason there is a longer delay between the Plan being adopted and the introduction of CIL the current arrangements would continue until CIL is adopted or be limited by the arrangements of the latest CIL Regulations (regarding pooling of contributions) in April 2015.
Safeguarding (Point 3)			
A25/21	Hampshire County Council	Paragraph 10.26 - In order to improve clarity and conformity with the Strategic Access to Gosport transport strategy, this paragraph should include reference to land safeguarding for the A32/Wych Lane junction and the Newgate Lane corridor.	Amend accordingly.
Policy LP22: Accessibility To New Development			
A26/16	Natural England	Policy LP22 details the requirement to ensure new development is situated in locations where public transport services exist is accessible to pedestrians and cyclists and any new roads network would not have a detrimental impact on the natural environment. Natural England supports this policy as it promotes the use of sustainable transport modes.	Support welcomed.
A24/7	Highways Agency	We support the policy wording which seeks to ensure that the impact of development is properly evaluated and also mitigated on the transport network. It is our view that both the wider transport related policies (LP21 and LP22) are consistent with the	GBC have commissioned a run of the Solent Regional Transport Model to investigate the transport implications of the proposed development on the strategic highway network. The accompanying Transport Statement reports how the results of the model are addressed

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		NPPF in seeking to promote sustainable development and to meet the infrastructure requirements of the borough. However, it is our view that at present the Local Plan sets out insufficient detail as to how the impacts of the Local Plan development will be mitigated on the SRN, and also makes no mention of specific junctions for promoters of development to assess.	
Policy LP23: Layout of Sites and Parking			
A24/8	Highways Agency	Satisfied that the policy wording is consistent with the NPPF, with particular reference to ensuring that sustainable modes of travel are promoted within new developments.	Acknowledge that the HA consider that the policy is consistent with the NPPF.
A25/26	Hampshire County Council	Paragraph 10.41 : The heading for this section of the Plan should be "Access <i>and</i> Parking for disabled people...." to be consistent with the wording of Point 8 of Policy LP23.	Agree and amend accordingly
A25/27	Hampshire County Council	Further Information Box: A reference should be added in this box to the " <i>Gosport Borough Transport Statement 2012 (HCC 2012)</i> "	Agree and amend accordingly
CHAPTER 11: CREATING QUALITY NEIGHBOURHOODS			
HOUSING			
A10/2	A resident	Lack of facilities to support new housing What facilities will be provided to support new housing? From the large Local Council housing developments of the 1930's/1950's to more recent Whiteley & Fareham a shortage of facilities has remained endemic, leading to endless social problems. The	The Infrastructure Delivery Plan sets out the range of infrastructure which will be required to support the new development. This plan will updated annually as part of the Annual Monitoring Report. The policies of the Local Plan will require developers to contribute towards new infrastructure through a range of mechanisms including on-site measures (secured by

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		miserable state of public finances until c.2035 will ensure that few facilities will be provided.	condition as part of any planning consent), Section 106 legal agreements for certain on-site and off-site measures and /or the forthcoming Community Infrastructure Levy (CIL).
A10/3	A resident	<p>Immigration and housing demand In relation to the provision of housing no reference has been made of the issue of immigration (Para 11.6, Box 11.1). This raises the questions of who all this new housing is for and what facilities will be provided.</p> <p>Within the Gosport Local Plan 2011-2029 Consultation Draft, is all development proposed solely for growth of the indigenous local population? If not, what % of new developments proposed up to 2029 within a) private housing & b) affordable housing, will be occupied by:-1) indigenous locals 2) immigrant locals 3) asylum seekers 4) illegal immigrants 5) immigrants who have been granted British citizenship.</p> <p>Firstly, I do not want Gosport to have an out of control immigrant problem. Nor do I want the Local Plan consultation or process to become a vehicle for firstly concealing immigration, then promoting it. The Plan must address these concerns directly.</p>	<p>Since the publication of the draft Local Plan a PUSH wide Strategic Housing Market Assessment has been published. This document has looked at population trends using the latest Government projections. It makes an allowance for migration which PUSH authorities will need to take in account in preparing their housing allocations.</p> <p>It is impossible to attribute proportions to the various groups of people identified by the objector and whether they will occupy private housing or affordable housing.</p>
Policy LP24: Housing			
Affordable Housing (Point 2)			
A19/3	PUSH	Support - The Local Plan policy to require 40% affordable housing is in line with the PUSH strategy.	Support welcomed

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A30/30	Beaulieu Properties LLP (Savills)	Whilst supporting the recognition that there is a need to consider economic viability with regard to affordable housing provision (especially once CIL is in place). However in order to be sound this policy should refer to 40% as a target.	The Policy as written clearly states that the Borough Council will 'seek' 40% affordable housing unless it can be clearly demonstrated that this level is not economically viable. It is therefore considered the Policy provides sufficient flexibility where there are viability and deliverability issues.
Effective and efficient use of land (point 3)			
A26/17	Natural England	LP24 (Housing) seeks to ensure the majority of new housing development is on previously used/brownfield land. Whilst Natural England support the reuse of land, this should be limited to land of low environmental or biological value.	Amend to clarify this point with relevant cross reference in the justification text.
A30/31	Beaulieu Properties LLP (Savills)	High density housing at Gosport Waterfront and Town Centre is supported where appropriate and these sites should not be limited in provision of residential development but this should be delivered where appropriate through a design-led approach.	Agree the Borough Council will continue to ensure appropriate densities through a design-led approach. The Policy does not set out density limits instead the justification text includes some indicative density ranges which may be appropriate for different parts of the Borough. Gosport Waterfront does not have an upper limit and thereby confirming that a design-led approach will be particularly important.
A40/4	A resident	Current housing small, compact and dense. This leads to family and social problems and difficulties.	The policy requires a mix of housing types and sizes although does not prescribe the physical size of individual dwellings as this is largely the concern of the market. Proposals for the size and density of dwellings are largely design led in relation to what is appropriate for that particular location. It is fully accepted that poorly designed housing can lead to family and social problems and Policy LP10 seeks to achieve good design for new developments

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Lifetime Home Standards (point 4)			
A30/32	Beaulieu Properties LLP (Savills)	<p>Strongly objects to criterion 4 of the policy which seeks to impose Lifetime Homes standards on all properties. This remains to be justified on the grounds of feasibility, viability and demographics. There is clearly a need for some properties to meet the criteria to meet demand, however it is the experience of the development industry that Lifetime Homes actively discourage a good proportion of home buyers, for example the requirements for larger doorways.</p> <p>There are good reasons to avoid 100% Lifetime Homes as there are obviously already significant controls available to Local Authorities to ensure well planned, attractive and sustainable development. It is widely accepted that Lifetime Homes standards increase build costs, which in turn will further reduce affordability (particularly when used in conjunction with the Code for Sustainable Homes) and hence slow down delivery.</p>	<p>The Government has produced its 'Housing Standards Review: Consultation' (August 2013) which is not advocating the use of Lifetimes Homes although it is considering a number of options to ensure homes are accessible to range of users. Options includes a basic Building Regulations level which could be increased over time and a nationally described planning standard which includes a proportion of homes built to an equivalent of lifetime homes and a proportion built to a higher wheelchair access standard. If the Borough Council is proposing to introduce a standard it would need a robust evidence base to justify the standard and also test its viability.</p> <p>In the light of the current uncertainty regarding how these standards will be formulated the Borough Council is proposing that developers should incorporate design principles to make a reasonable proportion of these homes adaptable over the lifetime of an occupant. This will be removed from this policy and referred to in the justification text of policy LP10.</p>
Accommodation for the elderly (point 5)			
A25/28	Hampshire County Council	Support the approach set out in Policy LP24 Housing including references for the provision of extra care housing and the further reference in paragraph 11.24 the role that extra care housing can play in helping to meet the demand for specialist housing to accommodate the Borough's increasing number of elderly residents.	Support welcomed

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A25/29	Hampshire County Council	The Borough Council may wish to consider the provision of Extra Care housing to be secured as part of the affordable proportion on prospective market housing schemes.	Include reference in the justification text
A39/1	McCarthy & Stone (The Planning Bureau Limited)	<p>Commend the Council's positive response to the issue of an ageing demographic profile specifically point 5) for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population.</p> <p>Whilst this policy commits to meeting the varying housing needs of the elderly within the Borough, given the imperative of meeting the needs of older people we respectfully suggest that the policy wording could be more proactive in actually encouraging such provision, perhaps along the following lines: 5) <u>Applications will be encouraged for accommodation to meet the needs of the ageing population including the development of sheltered housing and extra care housing in appropriate locations</u>". (Revision Highlighted)</p>	<p>It is not considered necessary to specifically encourage applications for elderly accommodation. It is clear from the Policy and supporting text that accommodation in the Borough is required and will be considered favourably providing it meets other policy requirements.</p> <p>The proposed wording would be inconsistent with the structure of other policies in the Plan.</p>
Policy LP25: Park Homes and Residential Caravans			
A23/8	Southern Water	Change Policy LP25 to reflect the principle stated in paragraph 11.27 that proposals for new park homes and residential caravans will be subject to the same infrastructure considerations as permanent accommodation.	Amend accordingly
A49/4	A resident	I hope that consideration will be given to the moving of the mobile homes from No. 2 Battery to enable	It is not the Borough Council's policy to move the mobile homes from the area adjacent Battery No2. The

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		this area to be developed.	site provides homes for a number of people and there are no apparent overriding need to relocate this use.
Policy LP26: Gypsies, Travellers and Travelling Showpeople			
Overall approach			
A25/30	Hampshire County Council	The policy approach is sound because it is consistent with the requirements set in the national policy Circular 01/2006 (Planning for Gypsy and Traveller Sites).	Noted
Evidence Base and consultation			
A33/1	Traveller Law Reform Project	<p>The Plan is not compliant with the Planning Policy for Traveller Sites, as it not based on a robust and up-to-date Gypsy and Traveller Needs Assessment.</p> <p>In preparing the Local Plan evidence base, the Council must demonstrate it has fulfilled its Duty to Cooperate.</p> <p>We understand that the Council is currently conducting a Gypsy and Traveller Needs Assessment in conjunction with neighbouring Local Authorities. However, the Local Plan does not provide any clear commitment for the timely delivery of this research, or any positive action plan for including Gypsy and Traveller site allocations in the future</p> <p>We are concerned that Gypsy and Traveller provision is not given sufficient priority in this Local Plan, considering the scale and urgency of need for sites across the country. We urge you to consider</p>	<p>At the time policy LP26 as set out in the draft version of the local plan which was published for consultation in December 2012 the Travellers Accommodation Assessment for Hampshire 2013 had not been finalised. The 2013 study recommended that 1 pitch be provided in order to meet an identified local need.</p> <p>The Borough Council has worked as part of a consortium with other Hampshire local authorities, As part of the Duty to Co-operate, the Borough Council has worked with others to enable local authorities to plan positively for sites across Hampshire.</p> <p>The study was prepared in accordance with national policy for Gypsy and Travellers and Travelling Showpeople in accordance with the Government's Planning Policy for Travellers. The final report sets out a number of recommendations including targets for pitches and plots projected forward to 2027.</p> <p>The findings of the study have been used as evidence</p>

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		<p>the following questions:</p> <ol style="list-style-type: none"> 1. What is the timescale for completing the Gypsy and Traveller Accommodation Needs Assessment? 2. After the completion of Gypsy and Traveller Needs Assessment, how will the findings be incorporated in the Local Plan? Will pitch targets be included in a Local Plan review? 3. Will the 5-year land supply for Gypsy and Traveller sites be identified through a Site Allocations Development Plan Document? 4. If so, how would these processes fit into the Local Development Scheme? <p>We would like to be kept informed about future consultations on the Local Plan and be actively engaged in the preparation of evidence and site allocations, as required by the national policy.</p>	<p>to develop the policy.</p> <p>Noted.</p>
A33/2	Traveller Law Reform Project	<p>The Council must demonstrate the <i>early and effective</i> engagement and cooperation with Gypsy and Traveller communities, representative bodies and support groups in preparing the Local Plan. This should include:</p> <ul style="list-style-type: none"> * creating an easily accessible local authority site waiting list to monitor arising need * consultation on criteria for Gypsy and Traveller site allocations * collaboration in conducting land searches 	<p>Noted. The consortium of local authorities appointed Forest Bus Limited to undertake the field work for the survey. Forest Bus Limited are a charity based in the New Forest with a long track record in working with the Gypsy and Traveller communities in Hampshire.</p> <p>The Borough Council has kept a number of key stakeholders informed on the consultation progress of the local plan these have included the Gypsy Council, the Showmens' Guild and the National Federation of Gypsy Liaison Groups.</p>
Supply of pitches and land			

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A33/3	Traveller Law Reform Project	The Plan is not compliant with the Planning Policy for Traveller Sites as it does not identify a five-year rolling land supply for Gypsy and Traveller sites.	The Borough Council have identified a site which it considers could be delivered within 5 years.
A33/4	Traveller Law Reform Project	The Plan is not compliant with the Planning Policy for Traveller Sites, as it does not set pitch targets that meet the permanent and transit accommodation needs of Gypsies and Travellers.	Table 1 in the Travellers Accommodation Assessment for Hampshire 2013 recommends the adoption of locally based targets for permanent pitches for Gypsies and Travellers.
Development considerations (Points a-d)			
A15/34	English Heritage	Policy LP26: Gypsies, Travellers and Travelling Showpeople should specifically mention heritage assets in d).	Agree. Amend policy LP26 (2) (d) to include heritage assets.
A23/8	Southern Water	Amendment Policy LP26 (new text underlined): <i>Sites for Gypsies and Travellers and Travelling Showpeople will be identified where the Council..... The criteria to be met are as follows:</i> <i>a) the site is accessible to local facilities and services, <u>and served or capable of being served by essential utility infrastructure;</u></i> <i>b) adequate levels of privacy and</i>	Agree. Amend policy LP26 (2) (a) to include suggested wording.
PRINCIPAL, DISTRICT AND NEIGHBOURHOOD CENTRES			
A40/5	A resident	Support plans to regenerate the town centre	Noted
A40/6	A resident	Develop retail needs – Town Centre is the shop front and the heartbeat of the town. Issues facing town centre include: <ul style="list-style-type: none"> Lack of a variety of shops to meet needs (no book shop, wool shop, a tired old Boots Chemist, no Stationers, delicatessen etc) 	Agree that the Town centre is important for the Borough. The Borough Council is a member of the recently formed 'Town Team' which is bringing forward a number of initiatives to address issues that the Town Centre currently faces including some of those identified by this representation including finding new uses for empty shops and improving the shopping

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		<ul style="list-style-type: none"> • Rejuvenated market that keep peoples interest, maybe less of them rotated, lively interesting ones: Art & Craft, French, Farmers, Fruit and Flowers etc. • Need to offer some good well known retailers a big carrot to attract them to our town • More than enough fast food outlets, charity shops cheap shops, not a great deal to pop down town for a browse meet a friend have coffee and chat they set the tone of the town. • The focus is on tourism the town should offer something unique to add to that and attract people to visit and spend money, talk about the town as lovely place to spend time. 	<p>environment.</p> <p>However many of the issues relating to the type and mix of shops are determined by the market and there is little the Local Plan can do to affect these investment decisions. The Plan does include a policy which aims to ensure that retail remains the core use of the town centre whilst allowing a significant proportion of other town centre uses such as cafes and restaurants. However it is important to note that planning cannot influence the quality of the retail, food and drink- this is determined by the individual businesses that decide to locate here.</p>
A40/7	A resident	Publicise plan/proposal re High Street Post Office – which is very poor all round	The Town Team has recently commissioned attractive boards on the Post office frontage to improve its appearance. It is understood that the future location of the Post Office has still to be confirmed.
Policy LP27: Principal, District and Neighbourhood Centres			
A30/33	Beaulieu Properties LLP (Savills)	The support for the growth of the evening economy of Gosport Town Centre is welcomed as this will assist in the regeneration of the town and the encouragement of the diversity of its economy in terms of attracting other uses, in particular leisure and hotel uses. The consequent increase in vitality and viability will in turn assist to reduce crime and anti-social behaviour.	Support welcomed.
A31/25	Lee-on-the-Solent Residents Association	2 d) – Enhancing evening economy should be subject to due regard to the amenities of local residents	Amend the justification to reflect this issue as well as a cross reference to the design policy.

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Policy LP28: Uses within Centres			
Policy LP29: Proposals for Retail and Other Town Centre Uses Outside of Centres			
Policy LP30: Local Shops Outside of Defined Centres			
Policy LP31: Commercial Frontages Outside of Defined Centres			
COMMUNITY AND BUILT LEISURE FACILITIES			
A12/1	The Theatres Trust	Object to the absence of the word 'cultural' in the title and within the policy. Objective 18 uses the term 'leisure and cultural facilities', para.3.27 uses the same phrase 'leisure and cultural facilities', the Summary of Issues on page 13 also uses the term 'leisure and cultural facilities'. There are further instances throughout the document. For consistency, please include the word 'cultural' in the title of this policy and within the policy.	Add the word 'cultural' in the title and within the policy as requested to provide consistency and further clarity.
A12/2	The Theatres Trust	We repeat our suggestion that it would be more succinct and no less accurate to just use the term 'community facilities' with the description <i>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i>	It is considered that Paragraph 11.74 accurately reflects the range of community facilities covered by the section. This is considered necessary to give the reader an understanding of the scope of facilities covered by this section.
Policy LP32: Community and Built Leisure Facilities			
A37/11	Sport England	Overall Sport England supports policy LP32	Support welcomed
New community and built leisure facilities (Point 2)			
A1/5	A resident	The Plan recognises the need for 'Cultural facilities: museums, libraries, theatres and cinemas'. However 3.31 states that Gosport inhabitants currently leave the Borough for theatre and cinema, and the Plan contains no actions to address this eg through encouragement of a cinema/small hall (only the space requirements). The Council could do more to	Accept that the Plan is limited on new and/or improved cultural provision and this is largely because there are currently no major public or private proposals for such provision. However the Plan itself does support the development of such facilities within the Regeneration Areas and

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		<p>encourage a range of cultural activity within the Borough and a suitable venue is needed.</p> <p>The Plan almost gives up on cultural provision, apparently accepting that people will continue to go to Fareham or Portsmouth (or beyond).</p>	<p>other suitable sites if these were being promoted providing the proposal meet with the relevant development control policies.</p>
Protecting existing facilities (Point 5)			
A12/3	The Theatres Trust	<p>The wording of the policy is sufficient although we would like to also see support and protection for existing facilities as well as proposals for new and criteria against losses.</p>	<p>It is considered Part 5 of Policy LP32 provides sufficient support and protection for existing facilities. It also sets out the criteria the Borough Council will use to consider the loss of any such facilities. The supporting text for point 5 provides further supporting guidance relating to this criteria relating to issues such as marketing and community involvement.</p> <p>Proposals for potential new community, cultural and built leisure facilities are set out in Policies LP4-8 relating to the Regeneration Areas as well as Policy LP9D relating to sites outside of the regeneration areas for leisure and community uses.</p>
A25/31	Hampshire County Council	<p>The criterion set out in Policy LP32 could be more flexible to enable public service providers to effectively respond to evolving service needs. The County Council considers that this could be rectified through changes to the wording of Policy LP32 to state:</p> <p>“5. Planning permission will not be granted which would result in the loss of existing community and built leisure facilities unless it can be demonstrated</p>	<p>It is considered that the use of ‘and’ rather than ‘or’ between point 5b and 5c is valid. The Borough Council considers that the extra test of 5c needs to be considered in addition to 5a and 5b rather than instead of 5a and 5b. Consequently even if an alternative venue is found for the existing community use or there is no longer a need for it, there may indeed be an alternative community use for the building.</p> <p>The Borough Council does not wish to include the</p>

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		<p>that:</p> <p>a) alternative provision is made of at least equivalent value in terms of quality, quantity and accessibility; or</p> <p>b) adequate and appropriate alternative facilities are available in the locality; <u>or</u></p> <p>c) it can be demonstrated that there are no viable community or built leisure uses for the premises or site and that there have been reasonable attempts to sell/let them for these purposes <u>for a period of 6 months; or</u></p> <p><u>d) the loss of the service or facility is part of a public service provider's rationalisation of services which would not be detrimental to an appropriate level of provision of that service or facility within the local community".</u></p>	<p>requirement for a 'six month period' in point 5c as this could be overly prescriptive as the length of period could depend on a number of factors. These could include the complexities of the building, the amount of money to repair/convert the building to an alternative use, the scale of the buildings, the level of marketing undertaken etc. Instead it is more appropriate to retain the guidance in the justification text which sets out a period of at least 6 months but recognising that it may be necessary to require a longer term.</p> <p>It is not considered that the objector's suggestion for d) is appropriate. In many cases the closure of a facility may be the result of the rationalisation of services but it is still relevant that the site should go through the same test as the building may be appropriate for an alternative community use (indeed some may wish to provide similar services on a community-run basis).</p>
A25/32	Hampshire County Council	<p>The County Council also considers that Policy LP32 should recognise the distinction between public service providers and facilities, which have a continuing interest in and support for their communities, and private operations such as public houses or local shops which can be lost permanently. This approach goes beyond traditional land use planning and integrates policies for development and the role of public service organisations, in line with paragraph 2.10 of the Planning Inspectorate's Local Development Frameworks Examining Development Plan</p>	<p>It is not considered that this distinction in the policy is relevant. The policy does not relate to public houses or shops –these issues are dealt with elsewhere in the plan. Instead this policy relates to those types of facilities identified at the start of the section.</p> <p>A cross reference to this paragraph as a footnote would assist in providing clarification on this matter.</p>

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A37/12	Sport England	<p>Documents: Soundness Guidance (2009).</p> <p>Sport England requests Point 5 is revised with regard to indoor sports facilities to more closely reflect the text in Paragraph 74 of the NPPF, which states:</p> <p><i>“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <p><i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;</i></p> <p><i>or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;</i></p> <p><i>or</i></p> <p><i>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”</i></p> <p>At present, the text may allow for existing sports facilities to be replaced with alternative uses. For example, a squash facility could be replaced with a community hall which would not meet the needs of the local sports community. It may be appropriate for the Council to introduce a separate policy covering indoor sports facilities.</p>	<p>Whilst point 5 of the Policy included in the draft Local Plan has similar criteria to that proposed by Sport England (and included in the NPPF) it is accepted that as worded the policy would not protect buildings used for sports being converted to other forms of community facilities (which would not comply with Para 74 of the NPPF). In order to address this issue it is proposed to include an additional point which uses similar wording to the NPPF. It will also be necessary to include a footnote in Point 5 excluding sports facilities from this part of the policy.</p>
Policy LP33: Cemetery Provision			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A35/32	Environment Agency	<p>Support the inclusion of this policy. Specifically pleased with the inclusion of 2. e) and f).</p> <p>We would welcome the inclusion of a statement encouraging the liaison with the Environment Agency in deciding potential / appropriate locations for cemeteries.</p>	Welcome support and amend accordingly
A46/10	Gosport Society	<p>Support this policy for the protection of Ann's Hill Cemetery, on the East and West sides of Ann's Hill Road. We would not support any attempt to turn part of the cemetery into a Memorial Garden. In fact we would support the restoration of the gravestones in the older cemetery, and the restoration of the interior of the North Chapel, now being used as a store for the various items of garden equipment, etc.</p>	The Local Plan policy protects the cemetery from other uses.
OPEN SPACE			
Evidence Base			
A37/13	Sport England	<p>Whilst Sport England acknowledges that some evidence has been prepared (2008 and 2011) it does not constitute, in Sport England's opinion, an up-to-date assessment of need (and therefore contrary to the NPPF. For example, the Sports Facility Strategy is now some five years old and out-of-date. The assessment of need for football was updated in 2011 but this appears to be the only area of the 2008 Strategy that has been updated. As such, there is a risk that the policies contained in the Local Plan may be found to be unsound as they are not fully justified.</p>	GBC has commissioned a new playing pitch sports facility strategy and the results have provided supported the publication version of the local plan.

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		We would strongly urge Gosport Borough Council to update the Borough's Facility Strategy before the production of further drafts of the Local Plan.	
Plan 16			
A31/26	Lee-on-the-Solent Residents Association	It is noted that Strategic Open Space is mentioned on Plan 16, page 157, but not Settlement Gaps.	The Plan is for illustrative purposes only to show the network of open spaces. In some cases the Borough's strategic open space is coincident with Settlement Gaps but not in all cases. To determine the boundary of the Settlement Gaps it is necessary to view the Policies Map.
Policy LP34: Provision of New Open Space and improvements to Existing Open Space			
Overall approach			
A25/33	Hampshire County Council	The County Council is minded to support the Borough Council's recognition of the important role of open space in delivering quality of life and health benefits to the local community	Support welcomed
Creating and improving open spaces (Point 2)			
A2/5	A resident	More funding directed towards the parks can greatly improve the image of the area.	It is accepted that parks have an important role to play in improving the image of an area and it is envisaged that the policies of the Local Plan (Policy LP34 and LP35) and related strategies will help improve the quality and value of existing parks. Such strategies will provide a focus for future Borough Council funding as well as any developer contributions.
Open space associated with new development (Point 3)			
A37/14	Sport England	Sport England supports that new development will be required to provide, or meet the reasonable cost of providing new open space, including outdoor sports facilities. This is consistent with Sport	Support welcomed

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		England's Planning Policy Objective 8 'Providing for Sport through New Development':	
A39/2	McCarthy & Stone (The Planning Bureau Limited)	<p>Concern that the requirement for on-site provision of public open space will be applied to specialist accommodation for the elderly.</p> <p>Whilst the majority of Later Living retirement housing schemes fall below the 50 unit threshold cited, Assisted Living (Extra Care) developments regularly comprise of 50 or more dwellings, as a critical mass of residents is required to maintain the enhanced facilities and services offered in these developments.</p> <p>The Community Infrastructure Levy Regulations give the former Circular 5/05 Planning Obligations tests legal force and places the onus on the Council to justify that developer contributions are necessary and directly related in scale and kind to the proposed development. The elderly and in particular the frail elderly do not require the same levels of provision as the general populace with certain types of open space, such as children's play areas, not required at all. We therefore consider [that] Policy LP34 to be contrary (to) Planning Obligations tests.</p> <p>We therefore respectfully request a reduced requirement for open space contributions from developments of specialist accommodation for the elderly. In particular developments aimed at the frail elderly, such as Assisted Living (Extra Care), should</p>	<p>It is noted that most later-living retirement housing will fall below the 50 unit threshold and will therefore not be required to provide on-site open space. Instead potential contributions for such provision will be in the form of CIL which could be used for a variety of infrastructure but not necessarily open space.</p> <p>The on-site standards set out in LP34 relate to developments of 50 or more dwellings. The standards only relate to the C3 Use Class and as such many residential care uses will not be required to provide open space to the standards set out in Policy LP34. The on-site open space provision will be considered as an amenity issue for C2 schemes (Policy LP10).</p> <p>The Inspector at the previous Local Plan Review Public Inquiry (2005) (following an objection from McCarthy and Stone) clearly agreed with the Borough Council on the need for developments for elderly people to contribute to open space provision. The Inspector stated, <i>'I am very surprised that McCarthy and Stone Limited consider that elderly persons do not require on-site informal open space or outdoor activities; such provision would be of course on a pro-rate basis depending on the number of units built. But not all elderly persons are inactive and in the modern world we are all being exhorted to try to keep healthy and active as long as possible. Residents of the type of</i></p>

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		<p>be exempted from open space contributions in light of the greatly reduced need for public open space.</p>	<p><i>accommodation built by the objector would also benefit from such areas when younger members of the family visit.'</i></p> <p>The same Planning Obligations tests applied then as now although they did not have a statutory status.</p> <p>For residential dwellings over 50 units it is therefore considered fair and reasonable for the developer to provide on-site open space provision for all the residents to enjoy. With considerable free time in many instances the elderly may use and appreciate the open space more than other segments of the population. The on-site provision will need to suit the needs of the development and therefore could include community gardens or even allotments.</p> <p>If provision can not be met on-site or only partially, it is considered reasonable for the Council to take a financial contribution for a specified open space improvement (as set out in a Section 106 agreement) in the vicinity of the development. The CIL Regulations restrict the number of contributions that can be pooled to no more than 5 (from April 2015) so negotiations with the developers will need to establish the most effective use of the contributions. It is considered this approach would meet the statutory tests set out by the Government in relation to Planning Obligations.</p> <p>In cases where some of the provision is provided on-</p>

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			<p>site (eg by communal gardens) the developer can offset this against the financial contribution.</p> <p>The standards count communal gardens associated with flatted development as part of the overall provision. This statement was previously included in a 'Draft Note To Developers,' that formed an appendix to the Council's 'Local Open Space Standards' (GBC 2012) document.</p> <p>The Borough Council has operated a reduced rate for contributions for developments for elderly people and it is proposed to have a reduced contribution linked to Policy LP34. However as the new policy has a greater emphasis on the provision of multi-functional local parks rather than sports facilities the reduction will be smaller.</p>
A37/15	Sport England	With regard to Table 11.3, Sport England considers that developers should be encouraged to provide outdoor sports facilities within larger development sites where possible and requests that Table 11.3 is amended accordingly.	Due to the compact nature of the Borough it is considered that normally outdoor facilities would be better placed in strategic locations and could be provided out of CIL. However smaller outdoor sport facilities such as a Multi-Use Games Area could be provided as part of the 'local park' on appropriate developments of 50 or more dwellings and it is proposed to amend the Local Plan text to be clearer on this issue.
A31/28	Lee-on-the-Solent Residents Association	11.105 – We feel that this para should make clear the need for children's' local play areas, separate from the urban park. Facilities in urban parks could be 400m from some houses and this is too far.	It is acknowledged that the current requirements for Local Area for Play (LAPs) is 100 metres from dwellings whilst Local Equipped Area for Play (LEAPs) is 400 metres. The latest standards do not rule out the equivalent of LAPs but it is less prescriptive on this as

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			<p>the value of LAPs may only be applicable in certain cases.</p> <p>The Borough Council wishes to move away from the approach of delivering numerous small play areas within new development and instead focus on multi-functional parks with plays areas. Flexibility is provided to enable the delivery of small local play areas where most appropriate. Over the past decade there has been some dissatisfaction expressed over the numerous play areas associated with new developments from local residents and those responsible for their maintenance. The value of some of these open spaces has also been scored low for recreational value in the Borough Council's Open Space Monitoring reports.</p> <p>Due to the forthcoming arrangements for the Community Infrastructure Levy the Borough Council has had to reconsider its traditional approach to securing open space associated with development. As part of the CIL Regulations the Borough Council can only pool developer contributions from no more than 5 developments, which significantly limits the scope of what can be achieved. Consequently as result of this the Borough Council will instead focus on securing open space provision by two key means.</p> <p>Firstly larger developments (50 or over) there will be emphasis to provide multi-functional on-site open space, usually in the form of a local park which can</p>

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			<p>include children's play areas to be provided within 400 metres of the dwellings on the site (as set out in the justification text). In some cases more than one open space could be provided ensuring facilities are close to residents. This threshold was chosen as it generates a sufficient requirement of open space to warrant it to be provided on-site and also that scale of development will normally require significant open space as part of the design. In some cases a developer contribution will be sought for off-site provision. Due to the size of the developments such off-site contributions will be more effective.</p> <p>Secondly for smaller sites under 50 dwellings the open space provision will be subsumed within the CIL tariff.</p> <p>Both methods have the potential to deliver plays areas (outside of parks) within 400 metres of new development. Although it is accepted that this latest provision is less prescriptive than the requirements to provide local areas for play in the Gosport Borough Local Plan Review.</p>
A41/1	Gosport Allotment Holders and Gardeners Association	11.108 - supports the intention to use the Community Infrastructure Levy as a means of providing additional allotments within the Borough but considers the CIL should also allow improvements to existing allotment site infrastructure not just provision of new land.	Noted. The draft 'Reg 123 list' which identifies the types of infrastructure on which the Council will spend its CIL includes Open Space. Allotments are a form of open space so CIL could be used for the provision of new and improving existing allotments.
Policy LP35: Protection of Existing Open Space			
A25/34	Hampshire	Support the Borough Council's recognition of the	Support welcomed

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	County Council	important role of open space in delivering quality of life and health benefits to the local community.	
A40/8	A resident	Protect and develop existing green and open spaces. People need space.	Agree- Policy LP35 aims to protect open spaces within the Borough
A37/16	Sport England	Sport England does not consider that Policy LP35 provides adequate protection for outdoor sports facilities. Sport England requests that the policy is amended with regard to outdoor sports facilities to more closely reflect the text of Paragraph 74 of the NPPF.	It is considered that the policy provides some flexibility to provide community uses which in some instances may assist in the greater usage of the open space and maintain its viability in terms of maintenance.
A25/35	Hampshire County Council	Policy should make reference to Section 77 of the School Standards and Framework Act 1998, which provides a justified mechanism to enable surplus school playing fields to be sold subject to the approval of the Secretary of State, with any proceeds of sale being reinvested in local education or re-provision of open space elsewhere.	Section 77 of the School Standards and Framework Act 1998 provides a justification mechanism for schools to release playing fields in terms of managing their estates it is not however a justification in planning terms. The Borough has a finite amount of open space and aims to retain such important facilities and consequently the Borough Council would still require the education authority to justify the loss of any playing fields in terms of the tests set out in Policy LP35. The education authority may wish to make reference the School Standards and Framework Act as part of its justification in a planning statement for an application which may support its case particularly in relation to part a) of Policy LP35. However it is not considered appropriate to make reference to Section 77 of the School Standards and Framework Act 1998 in the Local Plan and would appear not to be strictly in accordance with the provisions of Para74 of the NPPF and in the light of Sports England objection above would not be supported.

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Specific open space sites: Civil Service Sports Ground			
A27/6	Milln Gate Gosport LLP (Barton Willmore)	<p>Object to the identification of the eastern part of Brockhurst Gate [Civil Service Sports Ground] as an 'Existing Open Space'; instead allocate the site for economic uses and amend Proposals Map accordingly.</p> <p>The requirement for 'much needed' outdoor recreation and leisure use is inaccurate and overstated. Reasons include</p> <p>Definition:</p> <ul style="list-style-type: none"> • The use of the site does not match the definition of Open Space provided in Section 336 of the Town & Country Planning Act 1990 (as amended) and NPPF Annex 2, insofar as it is not used for the purposes of public recreation and has no public value. • It is therefore inconsistent and unjustified to retain it as Open Space given the important distinction between public and private use. <p>Supply: The Open Space Monitoring Report (December 2012) identifies a deficiency in outdoor sports facilities in the Elson Ward. This Report is inaccurate as it fails to take into account the positive effect that redevelopment of the adjacent Gosport Leisure Centre and the replacement outdoor provision this scheme provided has had on access to sports provision in the area.</p>	<p>The Borough's latest Playing Pitch and Sports Facility Assessment (Nov 2013) recommends that good quality pitches in the Borough such as the former Civil Service Sport Ground is retained as a playing pitch in order to meet demands over the Plan period. There are currently, and will continue to be, pressure on the existing pitch supply due to a number of reasons:</p> <ul style="list-style-type: none"> * high demand of senior pitches at certain times of the weekend which is likely to intensify as current league grows over time; * the need to have at least a 10% reserve in order that pitches are given sufficient rest, particularly those of poorer quality; * a large element of the supply is not in the control of the Borough Council (i.e education sites and MoD) and therefore the supply of such sites can be withdrawn/unavailable at short notice, as has happened recently. <p>Outdoor Sport deficiencies are considered on a Borough-wide basis not on a ward basis.</p> <p>The open space also serves a valuable townscape function in relation to the setting of Fort Brockhurst and this is set out in the Council's Townscape Appraisal.</p>

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		<p>To retain a site directly opposite the Gosport Leisure Centre for such purposes is unjustified when needs have otherwise been met and the Site is not available to the public in any event.</p> <p>Function: As an outdoor sports facility, when in use, the Site was not of public value as it was used only for private purposes by the MOD and the CSSC. Whilst the Open Space Monitoring Report 2012 suggests considering the potential for improving public access opportunities to the Site this will not occur as DIO and Millngate have no intention to re-use the Site as a permanent sports facility either privately or publicly during the Plan period.</p> <p>To emphasise the Site's inappropriateness as Open Space, it is important to compare it to the Local Plan's summary list of the essential functions that Open Space are expected to have (see paragraph 11.89). The Landscape Appraisal has reviewed the Site against these functions (see Section 4.0 of the Appraisal).</p> <p>On this basis, the Site is considered to perform poorly against the Local Plan's essential functions and there is no justification for its retention as it is reasonable for areas designated to perform at least a range of the functions.</p>	

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		<p>Visual amenity: The site serves no specific purpose in terms of protecting visual amenity for the reasons outlined in the accompanying Landscape Appraisal. It concludes that the Site does not function as part of the Fort Brockhurst's setting. This is particularly significant when that part of the overall Brockhurst Gate Site that is visible from the woodland in front of the Fort is actually identified for development under Policy LP9B.</p> <p>Instead, the setting and landscape character of the Fort can be adequately protected by the ability to achieve an appropriate landscape and built development as and when a scheme proceeds for the Site in accordance with Policy LP9B (subject to our recommended amendments) which achieves compliance with criterion a) and b) in relation to design and the Fort's setting.</p> <p>Conclusion:</p> <p><u>Policy LP35: Protection of Existing Open Space</u> Amend the Proposal Map to remove the Existing Open Space designation from the Site as shown on Figure 6.0 of the Landscape Appraisal and include the Site within the Policy LP9B allocation.</p>	
A27/7	Milln Gate Gosport LLP (Barton Willmore)	Amend the Proposal Map to remove the Existing Open Space designation at the DM Gosport land to the north of Heritage Way (map supplied)	It is not proposed to amend this designation as the Borough Council intends to retain this site as an open space. A full consideration of this issue is given above

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
			(A27/6).
Specific open space sites: St Vincent College- open space adjacent Forton lake			
A18/22	A resident	An area of land belonging to St Vincent College on the north side of the western arm of Forton Lake is shown as Public Open Space, but in the last year or so has been closed off to the public by the college. GBC need to clarify whether public access is allowed on this land and whether the public space policies applied to the land have been infringed. The area consists largely of semi-natural unimproved grassland and is of high nature conservation value. The college also stopped mowing the grassland several years ago and is allowing part of it to become scrubbed over by Blackthorn.	This open space is shown as ' Existing Open Space' on the Policies Map and relates primarily to Policy LP35 of the Local Plan which aims to protect such open spaces from development including both public and private sites This particular site appears to be managed by St Vincent and issues regarding its management would need to directed directly to them. The Policies Map does not include a designation 'public open space'.
Specific open space sites: Manor Way			
A43/3	A resident	The Daedalus sports field off Manor Way is shown as existing Open Space on Policies Map but is fenced off and used as a private paddock. It should be Open Space. Cemetery, park, allotments, sports use or a mixture. This is or was crown land (MOD) then SEEDA and now Gosport/Fareham Council or has it been stolen? Explanation please.	The site is currently owned by the Homes and Communities Agency. Agree that it would be appropriate for this site to be available for wider community open space uses and consequently it has been protected as open space in the Local Plan should opportunities arise in the future.
Policy LP36: Allotments			
A41/2	Gosport Allotment Holders and Gardeners Association	The Association recognises the vision of the Council and fully supports Policy LP36.	Support welcomed
A18/18	A resident	Support paragraphs 11.115 and 11. 116. Allotments in Allotments hold considerable nature conservation importance.	Support welcomed

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A41/3	Gosport Allotment Holders and Gardeners Association	It is our view that in order to protect allotment sites, as recognised in the Open Space Monitoring Report, the Council designates all allotment sites within their control as a Statutory Site (including any new site in the Alver Valley area).	<p>The existing allotment sites are protected by Policy LP36 and are shown on the Policies Map. Once adopted the Local Plan has statutory status and consequently the allotments have significant protection for planning purposes.</p> <p>No decision has been made on any potential allotments in the Alver Valley and consequently it is not possible to show this on the Policies Map.</p>
Policy LP37: Access to the Coast and Countryside			
A26/18	Natural England	Supports LP37. However, advise that the following should be added to this policy: <i>“d) the development seeks to link to and integrate with the existing public right of way network, including the creation of new offsite permissive routes where viable and desirable”</i> . All too often no effort is made to link new developments with the existing public right of way network, making for unhealthy, low quality developments.	Amend point 1b to incorporate this element and amend justification text accordingly.
CHAPTER 12: CREATING A SUSTAINABLE ENVIRONMENT			
A13/7	Portsmouth Water	The Vision Statement mentions “water conservation” but this is a drought measure where companies impose temporary restrictions on specific activities and Portsmouth Water’s plans are based on “water efficiency”. The designation of Portsmouth Water’s area of supply as “Water Stressed” is currently under review by the Environment Agency. This affects the Company’s ability to instigate compulsory metering.	For the avoidance of any confusion with the technical meaning of ‘ <i>water conservation</i> ’, amend the phrase to ‘ <i>water efficient</i> ’.
A34/3	A resident	Sustainability is the paramount good. Most problems, including demand for housing, food, water,	It is not the role of the Local Plan to restrict population but meet the needs arising from changes in the local

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		wastewater treatment, roads, transport, electricity, gas, health services, infrastructure and facilities, quality of the environment, and deprivation, are all made harder to solve by having more people. It is no longer taboo to talk about restricting population	demography. The Local Plan aims to ensure that sufficient land is available for key requirements such as housing, employment and community facilities to meet the needs of the local population. The Plan aims to ensure that the local environment is protected and where possible enhanced whilst addressing social and economic issues.
SUSTAINABLE CONSTRUCTION			
Policy LP38: Sustainable Construction			
A19/4	PUSH	Support - The approach to sustainable construction is in line with the PUSH strategy.	Support welcomed
A26/19	Natural England	Support.	
A13/8	Portsmouth Water	Portsmouth Water is developing “allowable solutions” for water such as Havant Thicket Reservoir. These options may be required in the future to balance supply and demand	Noted.
A13/9	Portsmouth Water	<p>The Government’s redefinition of “zero carbon” for energy use should also be applied to water use. Construction policy should achieve “low carbon” use in homes with sustainable water resources.</p> <p>Level 5 of the Code for Sustainable Homes can theoretically be achieved with the use of water efficient fittings.</p> <p>It would be very helpful if Gosport Borough Council also published a practical guide for developers to ensure implementation of the code delivers the best outcome for the water environment.</p>	<p>The emerging Government Guidance is very clear that it proposes to ‘wind-down’ the Code for Sustainable Homes and instead it is proposed to incorporate many elements within Buildings Regulations and ‘nationally described standards’. This policy will be deleted.</p> <p>The Borough Council will continue to use nationally recognised development standards for water use. This matter will be addressed in in the Policy on Water Resources.</p> <p>The Borough Council is not currently anticipating preparing a practical guide for developers on implementing Code for Sustainable Homes and</p>

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			<p>BREEAM standards and instead will expect developers to use existing guidance produced in connection with these standards.</p> <p>If it becomes apparent that further local guidance is required as the standards become operable the Borough Council will reconsider this position.</p>
A20/5	Berkeley Homes (Southern) Ltd	<p>Object - In October 2012, the government announced a review of housing standards, including the Code for Sustainable Homes, which is expected to be reported in spring 2013. The NPPF states that when setting any local requirement for a building's sustainability, to do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards. With these standards being under review, the inclusion of specific targets within this policy is considered to be premature.</p>	<p>The emerging Government Guidance is very clear that it proposes to 'wind-down' the Code for Sustainable Homes and instead it is proposed to incorporate many elements within Buildings Regulations and 'nationally described standards'. This policy will be deleted</p> <p>Appropriate elements have been incorporated into LP10: Design, new policy on Energy and new policy on Water. The Government guidance makes it clear that many aspects should not be included in local plans</p>
A30/40	Beaulieu Properties LLP (Savills)	<p>Object - Question the viability of the requirement that all new homes shall at least be built to the full Code for Sustainable Homes Level 4 standard in 2013 and Level 5 in 2016.</p> <p>Question the viability of the requirement that all non-residential buildings over 500m² gross internal floorspace shall at least be built to BREEAM 'Excellent' standard.</p>	<p>The emerging Government Guidance is very clear that it proposes to 'wind-down' the Code for Sustainable Homes and instead it is proposed to incorporate many elements within Buildings Regulations and 'nationally described standards'. Accordingly this policy will be deleted.</p>
A39/3	McCarthy &	Concern regarding the requirement for all new	

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	Stone (The Planning Bureau Limited)	homes to be built to Code for Sustainable Homes (CISH) Level 4 from 2013 and CISH Level 6 by 2015.	
A31/29	Lee-on-the-Solent Residents Association	12.13 – The policies within this section are obviously crucial to future developments; however, are these requirements affordable?	
A30/34	Beaulieu Properties LLP (Savills)	The recognition of viability issues in achieving BREEAM Excellent and Code for Sustainable Homes Levels in this paragraph is supported. This is crucial as these issues can be difficult to meet, especially with regard to certain specific uses such as foodstores.	Noted. However, the emerging Government Guidance is very clear that it proposes to ‘wind-down’ the Code for Sustainable Homes and instead it is proposed to incorporate many elements within Buildings Regulations and ‘nationally described standards’. Accordingly this policy will be deleted
Policy LP39: Energy Resources			
Energy associated with new development (Point 2)			
A30/35	Beaulieu Properties LLP (Savills)	<p>Object - Generally supportive of the hierarchy approach to securing energy efficiency, notably the ‘fabric first’ approach outlined in LP39 (criterion 2 bullet 1).</p> <p>It is however questioned why the policy needs to be as prescriptive as outlining that connections to CHP and use of on-site renewable is sequentially preferred to ‘allowable solutions’. This may not be technically feasible in certain cases and the Council will require an evidence base to justify the proposed CHP network. Greater flexibility will enable higher quality design and delivery. It is however</p>	The Government has published more guidance on energy resources (Next steps to zero carbon homes – allowable solutions. The policy will be redrafted to reflect this guidance. It will be less prescriptive and refer to the latest government standards.

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		<p>appreciated that the Local Plan refers at criterion 1 to the ability to retrofit existing property to make this more energy efficient. This will deliver far more carbon saving than overly prescriptive approaches to new build (which already have to comply with far more stringent Part L Building Regulations).</p> <p>Achieving the highest standards of sustainability needs to be balanced by viability and deliverability (notably feasibility), and the need to provide for other requirements such as infrastructure and affordable housing that may impact on the viability (and deliverability) of proposals. An overly restrictive sustainability policy risk undermining wider Local Plan objectives, for example affordable housing delivery and the housing land supply. A more flexible approach would be to remove the detail of this policy from the Local Plan, notably as a lot of matters are covered by the Building Regulations.</p>	
New renewable energy resources, low carbon and CHP (Point 3)			
A19/5	PUSH	Support - The target of 20% electricity from renewable energy by 2020 is in line with the PUSH strategy.	Support welcomed.
A30/36	Beaulieu Properties LLP (Savills)	Is the 20% renewable target across the PUSH area still relevant by 2020 (notably owing to the impending revocation of the South East Plan)? It is important that the policy is clear that it is not expected that new development deliver 20% energy requirements on-site and that this overall aim relates specifically to proposals for renewable energy projects	This 20% renewable target across the PUSH area by 2020 is still relevant as this approach has been included in the latest South Hampshire Strategy (PUSH 2012) in Policy 18. Although it is agreed that it is not necessary to include this point in the policy and that it could be included in the supporting text.

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A15/35	English Heritage	English Heritage welcomes and supports criteria 3b)	Support welcomed.
A26/20	Natural England	Support the commitment set out within this policy and in particular the reference to the protection of biodiversity assets.	
Policy LP40: Water Resources			
A23/9	Southern Water	Southern Water broadly supports this policy but should be renamed ' <i>Water resources and waste water infrastructure</i> '	No change- the term 'water resources' is used in its broader sense to encompass all uses of water and therefore the title would include dealing with waste water
A35/33	Environment Agency	It is good to see that water resources have been given an individual policy; we are very supportive of this approach.	Support welcomed.
Water quality (Point 1 and supporting text)			
A35/34	Environment Agency	<p>Water Framework Directive (WFD)- Recommend that greater reference to the requirements of the Water Framework Directive (WFD) is given within the Local Plan. We would like to see specific reference made to the WFD within Section 1 of this policy.</p> <p>The aim of the WFD is to ensure that there is no deterioration of water quality in a water body and improvement wherever possible.</p> <p>The requirements of the WFD to protect and enhance designated areas are equally as valid as the requirements under the Habitats Directive and we would expect reference to this legislation within the Plan's policies as frequently as references to the</p>	Amend Policy accordingly and include some further information in the justification text.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>Habitats Directive appear.</p> <p>We would suggest that the WFD is referred to within a specific policy, potentially LP40: Water Resources as an additional bullet pointed in relation to the protection of and improvement of the quality of water. Suggested wording would be:</p> <p><i>'Does not have an adverse effect on the quality of surface, ground or coastal waters in line with the Water Framework Directive'</i></p>	
A26/21	Natural England	<p>Welcome the inclusion of the measure to ensure development will not be permitted if it is likely to have a negative impact upon the water quality including surface, ground or coastal waters.</p>	Support welcomed
A13/11	Portsmouth Water	<p>Para 12.28 - We are not aware of the "Improving Hampshire Rivers and Streams" project but the River Alver and Hoeford Stream are not impacted by public water supply abstraction.</p>	Noted.
A35/35	Environment Agency	<p>In the explanation of policy LP40, paragraph 12.28, we would propose the following change to the text:</p> <p><i>'There are two watercourses within the Borough that are currently failing under the Water Framework Directive as a result of poor water quality and habitat modification. The identified watercourses are the River Alver and the Hoeford Stream and consequently it will be important that opportunities are taken to improve them and that new</i></p>	Amend accordingly

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		<i>development does not exacerbate the problem.'</i>	
Water supply (Point 2)			
A13/10	Portsmouth Water	Para 12.29 - Portsmouth Water's Water Resources Management Plan and Business Plan aim to provide sustainable water supplies to Gosport.	Noted.
A13/12	Portsmouth Water	<p>Para12.29 - Reducing the amount of water that is consumed is part of Portsmouth Water's plan, local recycling/harvesting is not! As set out in our comments on Sustainable Construction (LP38) the use of small scale rainwater harvesting and greywater recycling does not necessarily deliver the desired outcomes. PUSH and Portsmouth City Council have clearly ruled out these measures and are relying on water efficient fixtures and fittings within new homes.</p> <p>We have previously set out why rainwater harvesting, at a domestic scale, does not reduce sewerage flows and does not help adapt to climate change and drought planning.</p>	<p>It is accepted that water consumption is in the short-medium term the most effective method to ensure that there is a sufficient water supply.</p> <p>In light of the Government's draft Housing Standards Review. The text of this policy has been substantial amended.</p>
Waste Water (Point 3)			
A35/36	Environment Agency	The Local Plan thoroughly covers the issues associated with infrastructure provision in respect of waste water treatment and capacity. Particularly welcome the recognition that there may be treatment capacity issues associated with Peel Common Waste Water Treatment Works, due the environmental constraints imposed in meeting the	Support welcome

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		requirements of the Habitats Regulations	
A23/11	Southern Water	<p>Amend Point 3 as follows:</p> <p>3) <i>Development proposals will be permitted provided that they facilitate the efficient use of new and existing infrastructure. In cases where these are deficient, development proposals <u>and their occupation should will</u> be phased to co-incide with provision of <u>necessary wastewater infrastructure</u> so as to safeguard the environmental qualities of the area. It will be necessary to:</i></p> <ul style="list-style-type: none"> a) <i>ensure that existing underground sewers are not built over;</i> b) <i>ensure that surface water is separated from existing foul or combined sewers; and</i> c) <i>where necessary, require construction of on-site or off-site sewers to adoptable standards to ensure they function effectively, <u>and adequate capacity is provided to serve the development.</u></i> 	Amend accordingly
A13/13	Portsmouth Water	Paragraph 12.31 - The issue of sewer infiltration is likely to be a bigger influence on sewerage flows than per capita water use. With more water efficient new homes and the impact of optional metering, Portsmouth Water now expects overall water consumption to fall.	Noted
A23/10	Southern Water	The information contained in paragraphs 12.31,	Amend paragraphs accordingly with update information

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>12.32 and 12.33 is now out of date.</p> <p>The PUSH¹ Integrated Water Management Study (IWMS) (published December 2008) assessed the ability of wastewater treatment works in the PUSH area to meet anticipated demand to 2025², based on the existing environmental permits at the works. The study found that the existing permit would be exceeded at Peel Common WTW (scenario 1).</p> <p>Southern Water can apply to the Environment Agency for new or amended permits at WTWs when forecast demand exceeds the headroom in the permit. The PUSH IWMP calculated the likely (stricter) environmental quality standards that would be required in the new/amended permit of the constrained works to allow the demand to 2025 to be accommodated without compromising water quality objectives. This was achieved by applying the Environment Agency's no deterioration policy.</p> <p>At Peel Common/Woolston WTW³ the study report stated: <i>"...it is predicted that an N [nitrogen] consent concentration of 7.96mg/l would be applied. This is significantly below the 9-10mg/l concentration that is, in our view, currently considered achievable and as</i></p>	

¹ Partnership for Urban South Hampshire.

² The scale, timing and geographical distribution of growth was in accordance with figures provided by Hampshire County Council.

³ The PUSH IWMS assumed that the flows at Woolston WTW would be transferred to Peel Common WTW for treatment.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p><i>such has the potential to pose a significant constraint to growth”.</i></p> <p>The measured flows used by the PUSH IWMS to assess headroom at Peel Common WTW were uncertified and based on newly installed flow measurement equipment. Southern Water has collected certified flow measurement data since 2008, and has reassessed the capacity available in the environmental permit. There is now also evidence to demonstrate that nitrogen removal can be achieved to lower concentrations than previously estimated (i.e. lower than 9-10mg/l).</p> <p>On this basis, and assuming that the Agency would apply the no deterioration principle in the event that a new or amended permit is required, Southern Water considers that the environmental constraint identified in the PUSH IWMS at Peel Common WTW has been removed.</p>	
A13/14	Portsmouth Water	Paragraph 12.35 – Sustainable Drainage – The use of domestic rainwater harvesting is unlikely to be cost effective for urban drainage problems. Tanks or water butts would have to be empty to attenuate intense rainfall events at the same time that they are assumed to be full for garden water supplies	Rain water harvesting is only one of variety measures that be include in SuDs. It is not prescriptive and if the developer considers it not to be viable then alternative measures can be considered.
Sustainable Drainage Systems (point 4)			

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
A23/12	Southern Water	<p>Bullet point 4 appears to be slightly confused, and implies that the three sub-points a), b) and c) only apply to proposals that incorporate sustainable drainage systems. Southern Water considers that all proposals, regardless of whether they incorporate sustainable drainage systems for surface water, should only be permitted to proceed if adequate sewerage and wastewater disposal facilities are available to serve the development.</p> <p>Also amend Point 4 as follows:</p> <p style="padding-left: 40px;"><i>4) Development Proposals which incorporate, where practical, the use of sustainable drainage systems will be permitted provided that:</i></p> <p style="padding-left: 80px;"><i>a. sewerage, sewage disposal facilities and surface water drainage of adequate capacity and design are available;</i></p> <p style="padding-left: 80px;"><i>b. the required capacity will be provided.....</i></p> <p style="padding-left: 80px;"><i>c. appropriate long term management.....</i></p>	<p>Point 4 relates specifically to sustainable urban drainage systems. The Borough Council has not received any objections to this part of the policy from Hampshire County Council which as the Lead Local Flood Authority (LLFA) will become the approval body for Sustainable Drainage Systems (SuDS).</p> <p>The Borough Council agrees that all proposals regardless of whether they incorporate SuDs or not should only proceed if adequate sewerage and wastewater disposal facilities are available. This issue is clearly addressed in Point 3 of the Policy and have been made more explicit by the proposed amendments to Point 3 suggested by Southern Water.</p>
Policy LP41: Waste and Material Resources			
A26/22	Natural England	Support the range of policies (LP38-49) that emphasise the importance of protecting and enhancing the natural environment.	Support welcomed.
A35/37	Environment Agency	Support this policy. It is good to see that the council is committed to increasing waste recycling and	Support welcomed.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		composting	
A15/36	English Heritage	English Heritage welcomes and supports criterion 2c) in Policy LP41.	Support welcomed.
Other issues: Dredging			
A7/2	Marine Management Organisation	<p>The MMO is responsible for issuing marine licences under the Marine and Coastal Access Act 2009. A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended) and early consultation with the MMO is advised. We would suggest that reference to this be made within planning documents to ensure that necessary regulatory requirements are covered.</p> <p>We would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible.</p>	Include new element to Policy LP41 relating to reclamation and dredging to take account of the MMO's comments.
Policy LP42: Green Infrastructure			
A26	Natural England	Policy is strongly supported. It seeks to ensure proposals which compromise the integrity of the overall green infrastructure network including internationally important sites and other habitats which support important species will not be permitted.	Support welcomed.
A25/36	Hampshire County Council	The Council's commitment to improving the GI resource in the Borough and the Council's approach	Support welcomed

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		of using the PUSH GI strategy and implementation plan as the policy framework to base local decision making and the influence this work has had on shaping the Local Plan is welcomed; as is the fact that open space and GI are integral to the delivery of the proposed major regeneration sites in the Borough.	
A35/38	Environment Agency	We are fully supportive of this policy and are very pleased to see it included.	Support welcomed
A46/11	Gosport Society	Support the aims of the Green Infrastructure policy to provide a network of green spaces throughout Gosport in order to improve biodiversity, and environmental benefits for local communities, as well as other benefits mentioned in the policy.	Support welcomed
Maintaining and enhancing the green infrastructure network (Point 1a and supporting text)			
A18/19	A resident	Support proposals and statements for green infrastructure as set out in Boxes 12.1-12.3. Suggest that as part of the process of creating and linking green infrastructure GBC should also look at planting new hedges as wildlife corridors, or restoring gaps in existing ones.	Support welcomed. Hedges are mentioned as a specific measure in the supporting text. As far as GBC's role in planting hedges is concerned this would need to be considered as part of a wider planting strategy outside of the Local Plan process.
A30/37	Beaulieu Properties LLP (Savills)	Box 12.3 and LP42 - Object - The provision of further Green Infrastructure along the extension of the Millennium Promenade within the Gosport Waterfront policy area needs to bear in mind that this may be restricted through on-going access to deep water for boatyards and marinas. This relates to the enhance element of Policy LP42 point 1(a)	The requirements for a public route through the Waterfront site will be considered in relation with other interests such as the need to maintain access to deep water. These elements are clearly set out in Policy LP4. The mention of this proposal in the information box in the Green infrastructure section is only included as

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
			potential scheme in broad terms and does not include detailed implementation elements which would need to be considered as part of LP4. It is not considered that Policy LP42 would harm the objectives for developing the Gosport Waterfront.
A35/39	Environment Agency	The approach set out in Section 12.52 with regards to the long term management of sustainable drainage systems is encouraged and supported.	Support welcomed.
Evidence studies and Strategies (Point 1d and supporting text)			
A25/37	Hampshire County Council	The County Council welcomes the inclusion of several references to the Countryside Access Plan (CAP) for the Solent Area. It would be helpful, if the County Overview CAP be referenced.	Include reference to overview document.
Omission			
A15/37	English Heritage	Policy 42 and/or its supporting text could refer to heritage assets which can form part of a Green Infrastructure network e.g. the Ramparts at Priddy's Hard.	Amend supporting text accordingly.
A35/40	Environment Agency	Specific reference to PUSH's Green Infrastructure Strategy may give additional weight to the policy.	Amend accordingly
BIOLOGICAL AND GEOLOGICAL CONSERVATION			
Overall approach			
A35/41	Environment Agency	Pleased that the plan recognises the high nature conservation value of the borough. Agree with the need to work in partnership with neighbouring boroughs, this will ensure green space is bigger, better (quality) and more joined up. The	Support welcomed

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>PUSH Green Infrastructure Strategy may help this.</p> <p>Welcome commitments to safeguard sites of nature conservation importance and work in partnership to deliver the findings of the Solent Disturbance and Mitigation Strategy.</p>	
A18/25	A resident	<p>Whilst it is pleasing to have numerous references to nature conservation and biodiversity issues throughout the Plan. There is concern that some of these statements are just confirmation of compliance with current legislation and may not necessarily result in positive action to protect and enhance wildlife. Key sites such as parts of the Alver Valley and Gilkicker are not being managed correctly and whilst some work has been done to manage sites in the Borough further resources are required.</p> <p>Concerns regarding:</p> <ul style="list-style-type: none"> • understaffed and underfunded Countryside section; • complacent and lack of ecological expertise within the Council <p>The Borough Council needs to:</p> <ul style="list-style-type: none"> • employ an ecologist; • carry an audit of nature resources in the Borough; • publish a local biodiversity plan; and • implement nature conservation management plans for key wildlife sites owned and managed by the Borough Council. 	<p>The Green Infrastructure Policy (LP42) clearly sets out the need to secure a net gain of on-site biodiversity as part of development. The Borough Council will continue to seek advice from the Ecology Section at HCC for guidance on this issue.</p> <p>The detailed ecological management of sites such as the Alver Valley and Gilkicker are addressed outside of the Local Plan process. This includes a stewardship agreement with Natural England for sites within the Alver Valley as well as a number of ecological management plans for Borough Council owned sites elsewhere in the Borough.</p> <p>The staffing resources of the Borough Council are not matters that are related to the local plan.</p>
A47/12	A resident	why don't you carry out such surveys to area round	The Borough Council as part of its on-going programme

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		Fort Brockhurst? Fishermen leaving their “stuff” around. It’s heart-breaking to find barn owls dead, caught in fishing wire.	of ecological surveys undertaken by HBIC surveyed Fort Brockhurst in 2014. The ecological value of the site is currently being assessed.
Biodiversity and water resources			
A13/15	Portsmouth Water	<p>Paragraph 12.62 – Biodiversity – Box 12.5 sets out the key biodiversity issues including water consumption. It is important to note that water consumption is likely to fall in the future despite increases in population. The Government is committed to falling consumption and economic factors will help us to move in this direction.</p> <p>Portsmouth Water’s abstractions have been assessed as part of the Habitats Directive Review of Consents. Full compliance with the site action plans is likely by 2015 and the rivers of the sub-region are being investigated as part of the WFD River Basin Management Plan. Further abstraction licence reductions are possible but Portsmouth Water has allowed for these in its planning.</p> <p>The Habitats Regulations Assessment for the Local Plan correctly states that water abstraction will not have an adverse effect on any European sites.</p>	The issues set out in the information box are set out at a broad level. Whilst there may be evidence that domestic consumption could fall it is still important to recognise that over time with changing climatic conditions water consumption could have an effect on water levels of protected rivers. It is therefore appropriate to mention that it is an issue that needs to be considered over the long term.
Policy LP43: Internationally and Nationally Important Habitats			
A26/24	Natural England	Policy LP43 is strongly supported.	Support welcomed
A26/25	Natural England	The policy and supporting text makes no reference to the developing work around the Solent Disturbance and Mitigation Project (SDMP), although	Amend accordingly

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		reference is made in LP3. We advise that the SDMP and any other strategic measures to mitigate impacts on European sites is referred to in this section	
A18/20	A resident	Box 12.6 These descriptions are more or less correct, but I would recommend taking more up to date wording from the Defra web site	No change required. The description in the information box accurately reflects the descriptions on the DEFRA website. The text in the box has been included as a straight forward summary rather than a technical legal definition. Natural England made no comment regarding this particular text.
A8/1	Isle of Wight Council	Welcome and support the commitment to protecting the Natura 2000 sites that are shared with the Isle of Wight (the Solent and Isle of Wight SAC and the Solent and Southampton Water Ramsar) through policies LP43 and LP45 (<i>see also LP45</i>). Note and support the reference in paragraph 12.66 to taking into account the in-combination effects of development on designations adjacent to, but not in, the borough (such as the Solent and Southampton Water SPA)	Support welcomed
A35/42	Environment Agency	Fully supportive of this policy	Support welcomed
A18/21	A resident	Paragraph12.70 - 'Browndown Range' should read 'Browndown Ranges' and 'vertebrates' should read 'invertebrates'.	Amend accordingly
Policy LP44: Locally Designated Nature Conservation Sites			
A26/26	Natural England	Policy LP44 is strongly supported.	Support welcomed
A26/27	Natural England	In relation to point 3 it would be helpful to make it explicit that compensation would be of a level that	Propose change similar to suggested text as this would accord with the principles set out in the NPPF requiring

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		there was no net detriment to biodiversity. As such we advise that the following text is appended to the end of para 12.74: “... <u>and would be of a level that ensured that there was no net detriment to biodiversity.</u> ”	no net loss of biodiversity.
A35/43	Environment Agency	Fully supportive of this policy	Support welcomed
Policy LP45: Protecting Species and Other Features of Nature Conservation Importance			
A26/28	Natural England	Policy LP45 is strongly supported.	Support welcomed
A8/2	Isle Of Wight Council	Welcome and support the commitment to protecting the Natura 2000 sites that are shared with the Isle of Wight (the Solent and Isle of Wight SAC and the Solent and Southampton Water Ramsar) through policies LP43 and LP45 (<i>see also LP43</i>)	Support welcomed.
A26/29	Natural England	Note that point 3b merely requires replacement of features lost. We advise that the plan should require no net detriment to features lost. As such issues such as time lag in achieving the original value, and the risk that the quality of the features will be lower than that lost, will need to be factored into the ratio of loss to replacement. We suggest the policy is amended to read: “Where such features are lost as part of a development proposal, the Borough Council will use conditions and/or planning obligations to replace those that are ensure no net detriment to features lost where applicable”, and an explicit recognition that typically a replacement ratio of greater than 1:1 will be required to account for time lags between loss and replacement and delivery and	Amend accordingly

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		quality risks. As such we advise that the following text is appended to the end of para 12.82: <u>“The level of provision should ensure no net detriment to biodiversity, factoring in time lags between loss and replacement and delivery and quality risks.”</u>	
A26/30	Natural England	Note that there is no reference to the forthcoming marine plan for the south coast. We advise that strong links should be made with this plan	<p>The content of the Marine Plan for the South Coast is not known. Therefore it is not possible at this stage to include detailed links to this Plan on economic, social or environmental issues. This position will need to be reviewed at a later date as further information emerges as a result of consultation on the Marine Plan.</p> <p>The Local Plan has had regard to the Marine Planning Statement (now included as a proposed change). Any policy in the Marine Plan which supports a net gain in biodiversity and reflects the principles set out in policies LP42-45 would therefore complement the Local Plan.</p>
A29/9	Hampshire & Isle of Wight Wildlife Trust	The Wildlife Trust is pleased to see the inclusion of Policy LP45: and the accompany text 12.77 recognising the need to take account of the relevant strategies and evidence studies when determining planning applications.	Support welcomed.
A29/10	Hampshire & Isle of Wight Wildlife Trust	<p>The Trust would also wish to see a separate policy on Waders and Brent Geese included in the Local Plan.</p> <p>As you are aware the Solent Waders and Brent Goose Strategy (2010) has identified the areas where there is uncertainty over the use of some sites. A new policy would address this issue of</p>	<p>It is not considered a separate policy is required as it is considered that such sites are given suitable protection by the existing policies.</p> <p>Policy LP42 states that development must accord with the latest strategies and evidence relating to green infrastructure. The Solent Waders and Brent Goose Strategy is specifically mentioned in the supporting text</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		uncertainty. This would set out clearly how the council will deal with Waders and Brent geese and following the guidance in the Waders and Brent Goose Strategy.	<p>as one of the strategies and evidence studies.</p> <p>Policy LP43 relates to internationally important sites which also includes consideration of non-designated sites which support the integrity of important nature consideration features of the European sites. This would include important Brent Goose sites.</p> <p>Policy LP44 relates to locally designated sites which includes the known important Brent Goose and wader sites which have been designated as SINCS</p> <p>Policy LP45 relates to protecting species and other feature of nature conservation importance which could include other Brent Goose sites and wader sites where there is some current uncertainty. Reference is made specifically to the Waders and Brent Goose Strategy within the justification text. When a development proposal comes forward advice will be sought from HCC Ecology which considers the provisions of the Strategy within their comments.</p>
A35/44	Environment Agency	Fully supportive of this policy	Support welcomed
A18/23	A resident	Recommend that GBC carry out an audit of all long established hedgerows in the Borough (details of how this would be carried out are included in the respondent's submission). A programme of replanting and repairing old hedgerows, planting new ones and managing them with wildlife in mind needs to be instigated.	<p>It is considered that Policy LP45 relating to protecting features of nature conservation importance will provide protection for hedges.</p> <p>A detailed audit of hedgerows and implementation plan would need to be considered outside the Local Plan process. The Borough Council's Countryside Section</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		Hedgerow planting should be encouraged around new developments, rather than general tree planting and is not often done with wildlife objectives in mind. I note that these sentiments are partly reflected in the document, e.g. Box 12.2 (<i>Green Infrastructure Strategy Initiatives</i>) and paragraph 12.62 within the section on Biodiversity and Geological Conservation, and thus receive my support.	has been forwarded these comments.
FLOOD RISK AND COASTAL EROSION			
Approach to dealing with Flood Risk throughout the Plan			
A35/45	Environment Agency	We are pleased with the importance associated to the issue of flood risk within the Draft Plan.	Support welcomed.
A35/46	Environment Agency	Suggest that the term 'flood defences', which is used frequently throughout the document, is changed to the term 'flood risk management measures'. This will provide flexibility over the preferred approach to delivering development that is safe from flooding as it will enable the consideration of a greater range of risk management methods than just flood defences.	Suggestion noted plan amended accordingly.
Policy LP46: Flood Risk and Coastal Erosion			
A26/31	Natural England	Support the range of policies (LP38-49) that emphasise the importance of protecting and enhancing the natural environment.	Support welcomed.
Flood risk management measures (point 1)			
A35/47	Environment Agency	There could be recognition with the policy of the need to improve flood risk management infrastructure to improve the standard of protection to the existing community.	Comments noted and plan amended.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>Recommend highlighting the significance of the Waterfront and Town Centre Regeneration Area in contributing to the overall strategy for reducing flood risk to the existing community over the next 100 years,</p> <p>Any proposals that come forward will need to contribute positively to the Portchester to Hamble Flood & Coastal Erosion Risk Management Strategy and will be key to the successful management of flood risk across the plan period.</p>	
Sequential test (point 3a)			
A35/48	Environment Agency	<p>We would strongly recommend that the content of this policy is re-ordered to follow the flood risk management hierarchy.</p> <p>We recognise that Point 1 of the policy relates specifically to coastal erosion and Point 2 to habitats issues; however the hierarchy, starts with avoidance of areas at risk of flooding first before appropriate control and/or mitigation measures are identified. It is essential that more obvious reference is made within the policy to the fact that the Sequential Test is the first consideration i.e. whether the development can be accommodated in a lower flood risk area. It is crucial that this is made more prominent in order to guide any windfall/non-allocated development that comes forward.</p> <p>Specifically, we would recommend that the principles</p>	<p>Recommendation noted and policy re-ordered to reflect this. This should make the approach clearer for those sites not allocated which may come forward during the plan period.</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		of both the Sequential Test and Sequential Approach are highlighted to a greater extent especially in relation to windfall/non-allocated development, preferably at the beginning of Policy LP46: Flood Risk and Coastal Erosion. We appreciate that the Sequential Test evidence for allocated sites is within the background paper and we do not expect repetition of national policy, however we feel the policy can be strengthened in relation to both the Sequential Test and the flood risk management hierarchy.	
Safe development (point 3c)			
A35/49	Environment Agency	The objective of achieving safe development could also be more prominent in the policy wording. Reference could then be made in the supporting text to the Borough Council's 'Guidance for Developing in Flood Risk Areas', which should provide local guidance on the definition of safe development and the Borough Council's preferred approach to achieving this. This is specifically relevant for policies LP4: Gosport Waterfront and Town Centre; and Policy LP6: Haslar Peninsular.	Comments noted and the 'Guidance for Developing in Flood Risk Areas document is more clearly referenced in the revised plan.
A35/50	Environment Agency	Whilst we are supportive of the requirement for safe access and egress under point 3. c) of the policy, this could appear at odds with the approach on individual sites, namely Haslar Peninsula where it may not be possible to achieve this without significant funding for flood defences. Perhaps the policy or supporting text could refer to the Borough Council's 'Guidance for Developing in Flood Risk	See comments for Ref No. A35/49 above.

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment(policy and paragraph references refer to numbers assigned in Consultation Draft)
		Areas' which sets out the preferred approach for managing risk.	
A35/51	Environment Agency	<p>Last sentence in Section 12.101 should be removed as it is not within the remit of the Environment Agency to comment on or approve the adequacy of site flood/evacuation plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with any development during an emergency will be limited to delivering flood warnings to occupants/users. Planning Policy Statement 25 (PPS25): Development & Flood Risk, Practice Guide (Paragraphs 7.25 to 7.33) place responsibilities on the LPAs to consult their Emergency Planners with regard to specific emergency planning issues relating to new development. In all circumstances where warning and evacuation are significant measures in contributing to managing flood risk, we will expect LPAs to formally consider the emergency planning and rescue implications of new development in making their decisions.</p> <p>It should be noted that a suitable site specific flood plan may reduce the risk to the occupiers of a new development, but would not remove the risk. Section 7.26 of the PPS25 Practice Guide states that new development should not rely on flood warning alone as the only way of managing residual risk. It should be noted that even if a flood warning is successfully</p>	<p>Comment noted, last sentence in the explanatory text for paragraph 12.101 has been removed.</p> <p>With regard to Environment Agency's comments relating to paragraphs 7.25 – 7.33. The Borough Council as part of its consultation arrangements consult Emergency Planning and where appropriate the emergency services. The Borough Council also notes the latest Government advice in planning practice guidance on this issue.</p> <p>In relation to the use of flood warnings, the comments are noted. The Borough Council would expect to see the use of flood warnings as part of a comprehensive flood risk management strategy such strategies will cover flood warning and evacuation procedures.</p>

Ref No.	Individual/ Organisation	Summary of Key Points	Action/Comment (policy and paragraph references refer to numbers assigned in Consultation Draft)
		<p>issued by the Environment Agency, there can be no guarantee that occupants will receive or heed the warning.</p> <p>In reviewing any site flood response plan, we recommend that the LPA consult their emergency planners, the emergency services and any Local Resilience Forum.</p>	
ENVIRONMENTAL QUALITY			
Policy LP47: Pollution Control			
A26/32	Natural England	Support the range of policies (LP38-49) that emphasise the importance of protecting and enhancing the natural environment.	Support welcomed
A31/30	Lee-on-the-Solent Residents Association	12.117 – We support these points. Are there government standards for Light Pollution?	<p>There are no specific government standards for light pollution. The following DEFRA document is useful in relation to lighting issues and makes it clear that light pollution is not necessarily the same as a statutory nuisance, ‘<i>Statutory nuisance from Insects and Artificial Light-Guidance on Sections 101-103 of the Clean Neighbourhoods and Environment Act 2005.</i>’</p> <p>http://archive.defra.gov.uk/environment/quality/local/legislation/cnea/documents/statnuisance.pdf</p> <p>It states that, ‘<i>Artificial light nuisance may be, but is not necessarily, the same as light pollution. Artificial light nuisance is a source of light that in the opinion of a trained public health professional, who makes an assessment on a case by case basis, interferes with someone’s use of their property, and / or is or might be</i></p>

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			<p><i>prejudicial to someone's health. Light pollution could be defined as any form of artificial light which shines outside the area it needs to illuminate, including light that is directed above the horizontal into the night sky creating sky glow (which impedes our views of the stars), or which creates a danger by glare. Although light pollution might affect the aesthetic beauty of the night sky and interfere with astronomy, it is not necessarily also a statutory nuisance. The statutory nuisance regime is not an appropriate tool with which to address light pollution per se.'</i></p> <p><i>It adds that ' It has been possible since 1997 for local authorities to consider lighting as part of the planning process for new buildings, both residential and commercial. Local authorities can decide to regulate lighting under planning permission, and set planning obligations for lighting to prevent light pollution. In these circumstances, new lighting must adhere to the original planning permission of the building. These conditions cannot be applied retrospectively and can only be applied to buildings built after 1997. However, the existence of planning permission does not mean that a statutory nuisance cannot then exist. Circumstances and local environments change. Statutory nuisance can occur whether or not planning permission is in place either expressly or implicitly permitting lighting.'</i></p>
Policy LP48: Contaminated Land and Unstable Land			
A26/33	Natural England	Support the range of policies (LP38-49) that emphasise the importance of protecting and	Support welcomed

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		enhancing the natural environment.	
A35/52	Environment Agency	We are pleased with the inclusion of this policy.	Support welcomed
A35/53	Environment Agency	We would suggest that Section 2. c) of this policy is reworded to read: <i>'cause pollution of <u>the water environment including groundwater, Portsmouth Harbour and the Solent</u>'</i>	Amend accordingly
A35/54	Environment Agency	We strongly support the collaborative approach advocated within Section 12.124, however, we would also recommend that with all applications within 250m of a landfill site and on all sites where previous uses may have resulted in land contamination and on all sites where contamination is known; the minimum information in relation to contaminated land accompanying a planning application should be a desk study, initial conceptual model and risk assessment.	Amend accordingly
Policy LP49: Hazardous Substances			
A26/34	Natural England	Support the range of policies (LP38-49) that emphasise the importance of protecting and enhancing the natural environment.	Support welcomed
CHAPTER 13: IMPLEMENTATION AND MONITORING			
Partnership working			
A13/16	Portsmouth Water	The role of PUSH in delivering Local Plans and Water Resources Management Plans is very important. Portsmouth Water does not agree with all aspects of the revised South Hampshire Strategy [which] still contains comments that we are unhappy with but the detailed approach to sustainable housing is now very helpful. The Environmental	Comments noted.

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		<p>Sustainability document has resulted in a more practical approach as demonstrated by Portsmouth City Council's guide for developers.</p> <p>Local Councils have been invited to take part in our WRMP Stakeholder Group and our overall Customer Consultative Group for the 2014 Business Plan. The proposed Infrastructure Delivery Plan is a way of highlighting the elements of these plans that are relevant to Gosport.</p>	
A15/38	English Heritage	We welcome the reference to English Heritage in the box following paragraph 13.3 (Partnership Working), and actively seek opportunities for partnership working.	Support welcomed and opportunities for partnership working acknowledged.
A19/6	PUSH	This paragraph refers to joint working with the Solent LEP and PUSH but PUSH is not listed in the corresponding box of partners.	Amend table accordingly
Local Plan Output Indicators			
A13/17	Portsmouth Water	Compliance with a particular level of the Code for Sustainable Homes is not an indication of actual water consumption. Work carried out by the Water Companies shows that homes built to Level 3 of the Code had an average consumption of 113 l/h/d. Care needs to be taken in setting any water consumption targets and the Government's aspiration of 130 l/h/d is an average for the whole country not the more affluent South East.	In light of the Government's draft Housing Standards Review these indicators have been deleted.
A25/39	Hampshire County Council	There appears to be a lack of conformity / consistency with Natural England's and PUSH's accessible natural green space standards (ANGSt).	Whilst it is accepted that the density of the Borough could provide some justification for using a 400 metre threshold rather than 300 metres; the main reason for

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		NE's recommendation is sites of at least 2ha within 300m of homes. However the Local Plan states the same area but within 400m of homes. This threshold is stated in Table 13.1 as an indicator for achieving suitable amounts of green infrastructure within the Borough. Clarification is sought as to why the Council has identified a lower threshold e.g. is this because of the high density and amount of housing in the Borough that means it is not be feasible to achieve the NE standards?	the threshold distance is that the Borough Council uses 400 metres for considering pedestrian accessibility to centres, open spaces and bus stops and therefore in order to achieve consistency 400 metres has been used for the accessible natural green space standard.
Appendix 2			
A15/39	English Heritage	We also welcome the criteria for a local list of heritage assets set out in Appendix 2, although reference could be made to the English Heritage guide on local listing.	Amend accordingly.
Appendix 3			
A12/4	The Theatres Trust	For accuracy with regard to planning applications, the last category on page 216 should read sui generis rather than 'others'	This table has been taken from a Government document and the term 'others' is considered appropriate in this context.
SUSTAINABILITY APPRAISAL			
A13/18	Portsmouth Water	The Interim Sustainability Appraisal (Dec 2012) refers to Portsmouth Water's 2004 Water Resources Management Plan rather than the more recent 2009 Water Resources Management Plan.	Update accordingly
HABITATS REGULATIONS ASSESSMENT			
A13/19	Portsmouth Water	Portsmouth Water is pleased to see that the Habitats Regulations Assessment is based on our 2009 WRMP and the latest abstraction licensing data. The Habitats Regulations Assessment for the Local Plan	Noted

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		correctly states that water abstraction will not have an adverse effect on any European site.	
A26/35	Natural England	Air pollution. We advise that the information presented within the Habitats Regulation Assessment does not allow a conclusion of no likely significant effect to be drawn. Natural England would be happy to have an informal conversation about the methodology used within this report, as it may be straightforward to demonstrate that the Local Plan will have no likely significant effect in terms of air pollution.	Natural England's comments have been addressed in the latest version of the Habitats Regulations Assessment which accompanies the Pre-submission version of the Local Plan following on-going discussions with Natural England.
A26/36	Natural England	Recreation impacts. The Habitats Regulation Assessment is ambiguous as to whether the plan can rule out a likely significant effect. The HRA states "The Local Plan includes effective measures to ensure that adverse effects can be avoided where new evidence points to a need for this." It is not clear what these effective measures are. In particular, the HRA identifies a number of European sites which are subject to disturbance, (para 5.6.1) but the recommendations in table 5.5 only relate to one of these sites. Moreover the recommendation in table 5.5 does not allow a conclusion of no likely significant effect to be drawn for the site it relates to.	
A26/37	Natural England	Site specific impacts. Para 6.6.1 states "It is not currently possible to conclude with certainty that there will be no adverse effects on the ecological integrity of Portsmouth, Langstone and Chichester Harbours, and Solent & Southampton Water SPAs/Ramsars as a result of site-specific impacts.	

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		However, it is suggested that by inserting the following policy provisions into the plan, supported by some suitable explanatory text, there would be adequate certainty that site-specific impacts could be avoided and/or mitigated.” In order to conclude no likely significant effect, the council must consider what is required for each of the allocated sites in terms of local plan policy, and demonstrate that the allocated sites can be delivered without a likely significant effect. At present, we advise absence of likely significant effect cannot be concluded	
A26/38	Natural England	Coastal squeeze. We agree that the wording in table 7.6 will allow a conclusion of no likely significant effect. However, we note that this does not appear to have been incorporated into the Local Plan.	
A26/39	Natural England	Water abstraction. We concur with the conclusion of no likely significant effect with respect to water abstraction.	
A26/40	Natural England	Waste water pollution. We are not clear about the logic used to justify a conclusion of no likely significant effect. Looking at Para 9.3.6, it is not clear whether either scenario 1 or 2 has no likely significant effect, and what certainty there is that either scenario 1 or 2 will come to pass. This should be clarified	
Infrastructure Assessment Report and Delivery Plan			
A13/20	Portsmouth Water	The Infrastructure Assessment Report will need to be updated as our 2014 WRMP passes through its draft stage and is incorporated in our 2014 Business	It is noted that the Infrastructure Delivery Plan (IDP) will need to be updated as and when this information is available. The IDP will be incorporated into future

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		Plan.	Annual Monitoring Reports.
A13/21	Portsmouth Water	The Infrastructure Assessment Report will need to be updated as the 2014 Water Resources Management Plan is adopted	Agree that on-going liaising will be important.
A24/10	Highways Agency	<p>The Infrastructure Delivery Plan should link with the findings of the Transport Assessment and other relevant transport studies in seeking to mitigate the impacts of development (and identify schemes), in Gosport on the M27.</p> <p>Whilst the Transport Assessment goes some way to satisfying the requirements of NPPF in that it has identified some transport issues and potential schemes. However, more details regarding the associated costs, affordability, deliverability, timescales and gaps in funding will need to be considered as part of the Infrastructure Delivery Plan, in advance of the Local Plan being submitted.</p>	The Infrastructure Delivery Plan is prepared with the latest information that is available from the delivering agencies notably Hampshire CC and Transport for South Hampshire and the Isle of Wight.
A25/40	Hampshire County Council	<p>In the section of this report on Daedalus (Section 4.2) the County Council wishes to see the following changes to the Transport & Accessibility box:</p> <ul style="list-style-type: none"> - Deletion of the reference to Newgate Lane but to be replaced with "<i>wider strategic transport improvements in the Borough and Fareham</i>". - - Addition of a reference to "<i>Complimentary measures to promote use of sustainable transport modes and reduce over reliance on the car for journeys to and from the site, through travel planning measures and measures to manage the deliveries and servicing of</i> 	<p>Retain reference to Newgate Lane as this is a scheme that is required as part of the Daedalus development. However it is possible to add '<i>wider strategic requirements on the Gosport Peninsula</i>' as it is recognised that contributions may be required for other strategic improvements in the vicinity.</p> <p>Agree, add reference to complementary measures to promote use of sustainable transport.</p>

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		<i>the site by lorries.”</i> 4.2 Addition of a reference to “ <i>Measure to improve accessibility to the site by bus travel, particularly from the surrounding built up areas of Fareham and Gosport.”</i>	Agree add this reference regarding bus travel..
A25/41	Hampshire County Council	Changes should be made to the Transport & Accessibility box in Section 4.4 on Rowner. In particular the addition of the text: “ <i>Complimentary measures to promote use of sustainable transport modes and reduce over reliance on the car for journeys to and from the site, through travel planning measures and measures to manage the deliveries and servicing of the site by lorries.”</i> It would also be helpful to add a reference to any necessary traffic management measures within the Rowner estate.	Add this reference as recommended by the highway authority.
Strategic Housing Land Availability Assessment			
A20/6	Berkeley Homes (Southern) Ltd	Strategic Housing Land Availability Assessment - as highlighted above, the reference to Royal Clarence Marina is incorrect and should accurately reflect the planning permissions that remain valid across the site (relating to Blocks NM4/5, NM7, G1, G2 and G3).	A revised Strategic Housing Land Availability Assessment is being prepared and will reflect the latest situation.
OTHER COMMENTS			
Consultation arrangements			
A5/1	Civil Aviation Authority	The CAA advice that it is not necessary to consult the CAA on Local Development Framework documents and have set out further details on other planning consultation arrangements (full details in	The contents of these arrangements have been noted.

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		letter).	
A47/13	A resident	Don't think the consultation has been marketed particularly well.	The Local Plan consultation has included a wide range of methods suitable for this stage of the process. Full details are set out in the Council's Statement of Consultation.
Relationship with SPDs			
A31/31	Lee-on-the-Solent Residents Association	Can we be assured that the sort of detail in R/DP & Appendix B [in the Gosport Borough Local Plan Review] will be included in the SPD's? It would be helpful if we could have a complete list of all SPD's (existing and proposed) with their titles. Alternatively, maybe, the SPD's should be referred to, by title, in appropriate places in the plan.	The design SPD covers much of this detail. The Borough Council has now published a list of all SPDs on its website.
Relationship with other Plans: Marine Planning			
A7/3	Marine Management Organisation	<p>The MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark. There will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. In our duty to take all reasonable steps to ensure compatibility with existing development plans, the MMO will seek to identify the 'marine relevance' of applicable plan policies.</p> <p>The next round of planning will begin in 2013 in the South plan area, which includes Gosport. Until such time as a marine plan is in place for the South plan area we advise Gosport Borough Council to refer to the Marine Policy Statement (MPS) for guidance on</p>	The Borough Council is aware that the preparation of the Marine Plan for the south coast has started and will continue to liaise with the MMO regarding its contents. Until such time the Marine Plan has been adopted the Borough Council will refer to the Marine Planning Statement for guidance on marine issues.

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		any planning activity that includes a section of coastline or tidal river.	
Image and marketing			
A2/6	A resident	Gosport has a very poor Internet presence at the moment. It just needs a new wave of marketing with lots of sunny photos of historic buildings, views across the water at night with the lights etc. with all the web tags to ensure that they come up on the first page of a Google images search.	The detailed aspects of marketing Gosport are not a direct consideration of the Local Plan but these comments have been forwarded to the Council's Economic Prosperity Section for further consideration.
Local Plan Procedure: Examination in Public			
A10/4	A resident	The Examination in Public (Eip) will be undertaken by an independent Planning Inspector who will invite appropriate stakeholders to take part in proceedings. This is a change from previous inquiries, where anyone who wishes to make representations can do so, including those who submitted objections. The ability of the Inspector to choose who appears and who does not is anti-democratic, and conveys the unfortunate impression that although he/she is independent, he/she is really expected not to be independent but to prefer Government policy.	These comments are noted. As the respondent understands these matters are completely outside the control of local planning authorities and would need to be directed to the Government and its Planning Inspectorate.
Miscellaneous			
A3/1	A resident	Concern about workmen leaving cigarette and rubbish on the floor of Council accommodation.	This is not an issue for the Local Plan. The Borough Council's Older Persons Services Team has been advised of the particular issue raised.