



**WINCHESTER LOCAL PLAN PART 2:
HEARING STATEMENT (MATTER 10)**

FOR:

**CHURCH LANE, COLDEN COMMON
(SITES 1871 & 2561)**

PREPARED BY:

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21 June 2016

Final Version

Summary

1.01 We would suggest that there are three key questions for WCC to answer:

1. Why was such overriding weight attached to the results of the 21 July 2013 local engagement exercise?
2. **Consistent with achieving sustainable development**, was increasing Sandyfields from 120 to 165 units the **most appropriate strategy**, when considered against **reasonable alternatives**, based on the evidence?
3. **Why did WCC officers rush the Sandyfields planning application to Committee on 21 April 2016**; when the SHLAA identifies this site for release after 2020; when revised plans were only received on 21 March 2016, giving insufficient time for statutory consultees to respond and for their responses to be fully assessed? It feels like an attempt to circumvent the Hearings.

1.02 To address the resultant soundness concerns, we request a modification that either (1) amends CC1 to include up to 45 units at Church Lane (1871/2561) and/or (2) reduces Sandyfields to 97 (maximum) in CC1 to bring this site back in line with the SHLAA, enabling other sites to come forward before 2020 as windfalls.

'Unsoundness'

1.03 The *coup de grace* is the density proposed for Sandyfields, and whether increasing this from 97 to 120, and then 165, is justified by the evidence and the policy framework provided by LPP1. The key facts:

- 21 July 2013 Sandyfields consulted upon as 97 units, in line with the capacity listed in the SHLAA.
- November 2013, Sandyfields consulted upon as 120 units and received (just) 13 supporting representations. Site 2494 (c45 units) was dropped.
- 3 March 2014, Revised Development Strategy, with Sandyfields endorsed by the Parish at 165 units.
- August 2014 planning application submitted for Sandyfields at 165 units.
- Some 14 months later (hardly indicative that the CC1 site selection process was based on sound evidence), there were still objections on site capacity from SDNPA, WCC Landscape, WCC Trees, HCC Ecology and HCC Highways, plus a damning report from the Design Review Panel (see Appendices 3 & 4, Matter 1). Even the developer, Foreman Homes, wrote to WCC on 13 May 2015 requesting a reduction in the density (ie raising questions on delivery/effectiveness and the market at such a high density).

1.04 The particular problem for WCC is that, **plainly, the evidence was not available at the time key decisions were made, and the decision to increase Sandyfields to 165 units was never consulted upon alongside other reasonable alternatives, including our site at Church Lane.** If there is no evidence available at the time a decision was made, then axiomatically the resulting development strategy cannot be justified by the evidence, particularly in the context of the approach taken by WCC to exclude from consideration all but the ‘chosen’ sites since October 2013 (a decision which, in itself, provides a strong indication that LPP2 is **not positively prepared**). The SA exhibits similar failings, with its focus on supporting Sandyfields (a single site) rather than justifying the plan by appraising the **most appropriate strategy** (options), **consistent with achieving sustainable development** (per the second bullet of paragraph 182). Crucially, the SA did not undertake any comparative assessment, for example, akin to the table we have included as Appendix 1. So the SA provides no justification of the “most appropriate strategy”.

1.05 WCC have sought to justify their decision making by reference to the Commonview local engagement exercise. However, whilst we fully support community engagement, this does not replace professional planning or the duties imposed upon WCC as local planning authority. It is unfortunate that WCC overlooked the warnings from their own LPP2 Officer (Gareth Williams, email 18 September 2013) that the Commonview questionnaire was “flawed” and the results should be “treated with considerable caution” (see Appendix 2). WCC appear to have forgotten about the ‘Golden Thread’ of sustainable development, leading to the conclusion that CC1 is not simply unsound, but also likely to lead to unsustainable, unintegrated housing, under the trees, the ‘wrong side of Main Road’, which has been judged by SDNPA (the expert statutory body) as having an adverse impact on the National Park, a nationally significant landscape asset that needs to be afforded “great weight” in the decision making process (CP19 of LPP1 is even stronger).

1.06 To add a further perspective, the c400 people who might live at Sandyfields have not had a vote (160 of whom, as tenants of RSLs, may not even have a choice). Localism is good, NIMBYism is bad. Unfortunately, the results of the 21 July 2013 engagement exercise have been misinterpreted and misapplied – and there is strong evidence to suggest that this has occurred though lack of due diligence, and for ulterior motives.

1.07 In our opinion, **the conclusions set out in Dr Harris’s letter of 16 May 2016 stand as clear evidence of unsoundness at the heart of WCC’s decision making on CC1** (see Appendix 2).

Questions

1.08 We now address the two specific questions set by the Inspector and, as agreed, include here six further questions to be reviewed through a SOCG:

- a. Was the local engagement exercise that underpinned Policy CC1 sufficiently robust, providing results that justify the policy on the evidence, having regard for reasonable alternatives?
- b. What is the rationale for focusing development on Sandyfields Nursery, and is this justified by the evidence, having regard for reasonable alternatives?

- c. Is the proposed allocation in conformity with LPP1, including Policies CP7 (accessibility to POS and addressing the 4 ha shortfall), CP10 (accessibility criteria), CP15 and CP19 (development in the national interest)?
- d. Is the proposed density appropriate and necessary, having regard for the evidence and the availability of reasonable alternatives?
- e. Has an assessment of the impact on the National Park and Ancient Woodland been undertaken and has this nationally significant landscape resource been accorded appropriate weight, including with regard to national policies?
- f. Is the policy likely to be effective given that part of the site lies within the jurisdiction of SDNPA and there is a need to find a site to relocate the storage of 500 caravans?

Question (i): Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?

1.09 CC1 fails the test of soundness because WCC has put Localism ahead of sustainable development; the latter being the 'Golden Thread' in planning, with the protection of future generations (eg those people who are actually going to live in the new development) and the 'precautionary principle' (eg adverse impacts on irreplaceable Ancient Woodland, protected species and the nationally significant National Park) being essential ingredients in a sustainable plan.

1.10 Our Statement on Matter 1 establishes the following soundness concerns:

- 1. Errors in due process.
- 2. Lack of robustness in the decision making framework
- 3. Clear and robust evidence was either overlooked or misapplied, or was simply not available to inform decisions at the time decisions were made.
- 4. Lack of diligence, a clear taint of bias, and a conflict of interest.
- 5. Conflicts with LPP1.
- 6. A failure to satisfy the concerns of SDNPA, or address the tests at paragraphs 115/116.
- 7. An inadequate SA – no weighting of criteria (especially landscape), no performance testing of the sites.

1.11 The detail is given in our Statement on Matter 1, save for the conflicts with LPP1, which are included here (in order to keep the earlier Statement within the word limit!).

1.12 From a strategic perspective, the approach advocated by DS1 presents a major difficulty for LPP2; and the bullets in DS1 (page 24) have not been applied to the CC1 site selection process. Moreover, we note that the LPP1 Inspector was clear that MRTA2 should refer to “about 250”; not ‘up to’, so (<10%) flexibility around 250 is in conformity. For Colden Common, even with the National Park, we are clear that WCC could have allocated slightly more housing, or provided for a windfall allocation. This is trite, given the proposals by Bargate and Welbeck, and the recent development by Bewley on Church Lane.

1.13 In terms of other key policies, we are perplexed at the lack of analysis undertaken by WCC; and we have had to suffer obfuscation from officers (orally and in their reports). For example, the Officers’ Report to the LPP2 Committee on 16 September 2015 omits to justify CC1/Sandyfields having regard for the following key policies of LPP1:

1. Policy CP7: Open Space, Sport & Recreation

This policy seeks *improvements* in the open space network and in built recreation facilities within the District, to achieve the *type* of provision, *space required* and levels of *accessibility* set out in the Council’s most up to date standards. The italics are important because these relate to the improvements against the three categories/rows in Table 1, which the Open Space Strategy 2015 (“OSS”) shows as a c6 ha shortfall. The OSS goes on to state that “the proposed housing allocations will provide an opportunity for additional on-site provision to meet current *and* future needs (ie to resolve the shortfall). WCC’s Landscape Officer puts it succinctly in his 5 October 2015 objection to the Sandyfields application: “the only realistic way of addressing this shortfall is to provide open space on the allocated site”. Sandyfields only provides 1.26 ha on site, which at 396 people (2.4 per household), gives a requirement of $396/1000 * 4 = 1.58$ ha. This breaches the on-site requirements of policy. WCC’s key error was to increase the density of Sandyfields from 97 units (in the SHLAA, Table 9) to 165 units. The ‘lost’ 2 ha (at 30 dph) would make all the difference from a landscape/POS point of view, reflecting the views of SDNPA that the “housing density and layout should respect the location” (developing the hardstanding, leaving the sensitive landscape as POS). Little wonder that SDNPA have maintained their objection to the Sandyfields application, but returned no objections to our application at Church Lane.

On accessibility (ie in addition to the POS required), we note that Sandyfields is 920m from Colden Common Park. The route has to go via Main Road and Boyes Lane because the route across the fields (proposed in the Foreman master plan) is covenanted and not available.

When challenged on these points as part of our application, Stuart Dunbar-Dempsey stated that CP7 provides for flexibility (ie “where feasible”) so Sandyfields can be compliant with CP7 without meeting the full POS requirement. This only acts to underscore the lack of soundness, because **the most appropriate strategy, when considered against reasonable alternatives**, did not have to compromise on POS provision, including the LPP1 objective of using new development to recover the shortfall in POS, as noted at page 17 of WCC’s Soundness Self-Assessment.

2. Policy CP10: Transport

Aside from specific policies in the Framework indicating development should be restricted on environmental grounds (Footnote 9, paragraph 14, NPPF) accessibility is the most important determinant of selecting sites for sustainability. Whilst WCC seek to rely on the Denmead appeal (APP/L1765/A/13/2209444) to support its position on housing land supply (which is now difficult given the persistent under delivery of the housing target every year since 2006), paragraphs 18/19 of the Inspector’s decision makes it clear that one of the three main reasons for refusal was, in fact, accessibility (the other reason being that there were 12 other SHLAA sites in the settlement that were not landscape sensitive). The same decision also concludes at paragraph 14 that, until LPP2 is adopted, development outside the settlement boundary would be contrary to LPP1; which is awkward for Sandyfields in relation to the Planning Committee on 21 April 2016, where departure issues were not addressed.

3. Policy CP15: Green Infrastructure

This policy refers to “a net gain of well-managed, multifunctional green infrastructure, in accordance with the categories and standards specified in Policy CP7 and appropriate for the scale of development, through on-site provision”. At 165, Sandyfields does not produce a net gain on site – 97 units would.

4. Policy CP16: Biodiversity

This policy seeks to deliver a net gain in biodiversity. It states that “new development will be required to avoid adverse impacts, or if *unavoidable* ensure that impacts are appropriately mitigated [Our italics]”. The problem for 165 units at Sandyfields is that the adverse impacts on the Ancient Woodland, GCN, grass snakes, bats, badgers, dormice and rare flora are plainly avoidable, but WCC did not assess reasonable alternatives (including fewer units at Sandyfields).

5. Policy CP19: South Downs National Park

This policy states that development “within and adjoining the South Downs National Park which would have a significant detrimental impact.... should not be permitted unless it can be demonstrated that the proposal is of *over-riding national importance*, or its impact can be mitigated” [Our italics]. The ‘soundness’ problem here for WCC is, again, the availability of reasonable alternatives (eg 1871), not simply in relation to the unjustified decision to increase the density of Sandyfields to 165, but also in the sense that development to the south of Colden Common does not need to be justified having regard for the test of “over-riding national importance”. As evidenced by the objections from SDNPA, Sandyfields has the wrong density/layout. 97 units might be sound, 165 units is not. Moreover, the ‘precautionary principle’ should be applied where development impacts on such an important, nationally significant landscape asset. This failure in decision making for Colden Common is put into context by the Bishops Waltham Development Strategy, where all the proposed sites are on the opposite side of the village to the National Park.

1.14 As the development plan is the most important decision making criteria, these omissions are very serious; including for the resolution at Planning Committee on 21 April 2016.

1.15 We are aggrieved at the processes deployed by WCC, particularly the lack of scrutiny, and do not consider CC1 sound. A sound process demands professional 'checks and balances'. The skill is to set a process that is able to deal with difficult/contested cases. This means that some cases can be delegated to Localism, but others require detailed and perhaps lengthy engagement, plus care and scrutiny having regard for the tests set out at paragraph 182

Question (ii): Are they clear and deliverable, including in respect of the associated infrastructure requirements?

1.16 In addition to the points made in our Statement on Matter 1, we note:

1. The on-site POS provision for Sandyfields (at 1.3 ha) is below the CP7 requirement of 1.56 ha (396 residents at 4 ha per 1000). Moreover, this site does not deliver the shortfall in POS in Colden Common (c6 hectares).
2. The Sandyfields POS offer is dependent on opening- up public access to Stratton's Copse (the adjoining Ancient Woodland), with the construction of a 450m raised wooden walkway. This is within the National Park and will require planning permission from SDNPA who, as recently as April 2016, objected to the scale and layout of development. WCC may dispute this point, but only SDNPA can determine whether planning permission is required.
3. The accessibility to Colden Common Park is not achievable 'as the crow flies' (owing to a covenant), so residents will have to walk 920m up Main Road and Boyes Lane, in breach of the 650m standard in CP7. Policy CC1 needs to be amended to reflect this constraint (eg a lower density would enable the provision of some sports provision on site).
4. County Highways have not removed their objection to the Sandyfields application (see letter dated 20 April 2016). They have indicated that development is possible in principle, but subject to a list of further information and, in particular, clarity on the required mitigation measures along Main Road (which to date have not been defined or assessed). It is difficult to find CC1 sound without the mitigation measures being clearly set out. In addition, the County is on record as preferring a dispersed strategy for Colden Common, stating that Sandyfields "is a significant sized site and is considered as *only* having 'adequate' access to shops, facilities and schools and therefore sites with better access maybe considered preferable [Our italics]" (see the Transport Update for 275 in the evidence base). A lower density would reduce the need for extensive mitigation measures.
5. We note the objection to the Sandyfields application from Chris Hales, who lives opposite Sandyfields in Scotts Close. He states that the pavements on Main Road are too narrow and "the vortex created behind a large vehicle is a frightening experience whilst walking along Main Road's narrow pavements". He adds "the surface water


drains on Main Road are inadequate and during heavy rain are incapable of handling the volumes.... as a result the detritus that flows down the hill from Sandyfields continues in to Scotts Close". These infrastructure issues present significant mitigation/delivery/effectiveness concerns.

1.17 We conclude that the consequences and impacts of CC1 have not been assessed or made clear, particularly in relation to reasonable alternatives (including a dispersal strategy), and whilst Sandyfields and the associated infrastructure may be deliverable in principle/theory, this has not been evidenced, and the costs/extent of mitigation works is uncertain and has not been SA'd. This is unsound. The (untested) dispersal strategy is most/more appropriate/sustainable (eg SDNPA and accessibility) and likely to give rise to fewer infrastructure and mitigation requirements. Our planning application at Church Lane has received no tree, ecology, highway, drainage or other infrastructure objections.

1.18 Against this background, we remain perplexed as to why WCC would want to rush Sandyfields through Committee on 21 April 2016. The highly conditioned and caveated resolution proves nothing, and is not a substitute for the paragraph 182 tests.

APPENDIX 1: COMPARISON OF 275, 2494 & 1871

22 March 2016 (Appendix 4 of our Planning Statement for OUT/00819/16)

Criteria	Evidence	275	2494	1871	
<p>The Character of Colden Common</p>	<p>What makes Colden Common special?</p> <p>“Colden Common is a thriving village lying on the outskirts of the South Downs National Park. The approach to the village is predominantly rural, and the main areas of housing are concealed from the main thru fare. The triangle of Main Road, Brambridge Road and Church Lane broadly contain the main developed area of the village. <u>The settlement lies close to many remnants of ancient woodland, part of the former Forest of Bere. The fields and woodlands rise to the east around Colden Common Park. This is an area of significant ecological and archaeological interest.</u> The avenue of lime trees leading from the B3335 to Brambridge House on the west of the village is one of the largest in Hampshire. These aspects of the local landscape are valued highly by the local community (VDS 2012) [our emphasis]”. Source: Colden Common Data Sets, August 2013.</p> <p>We take from this character assessment that the National Park has a pervasive influence on the character of Colden Common and, combined with other aspects of character, the area to the north, west and east offer the greatest potential for development to have a negative impact.</p> <p>We also note page 9 of the Village Design Statement that states: “For local residents, an important characteristic of Colden Common is that those travelling along the ‘triangle’ of roads which broadly contain the developed part of the village can remain unaware of the proximity of the large area of housing contained within that triangle”. We conclude that 2494 presents twice as much road frontage and presents a rising gradient to Main Road, and therefore offers more potential for impact than 1871 (which is about the same size and configuration, but turned 90 degrees, ie the short end, on to the road). 889 is also highly visible on Main Road, which is generally characterised by development interspersed with a series of green spaces – maintaining a “green perspective” along Main Road (VDS, page 11).</p> <p>We conclude that 1871 offers better potential, and less impact than 2494, in relation to the overriding consideration of the character of Colden Common. As evidenced in the Village Design Statement (below) 1871 is away from the sensitive, western part of Church Lane. 275 is well concealed at the front, but exposed to the fields and woodlands to the east, including from Boyes Lane. Hence scored on parity with 1871.</p>	0	-1	0	

<p>Village Design Statement</p>	<p>We note the following guidance from the VDS, in addition to what has already been quoted above:</p> <ol style="list-style-type: none"> 1. Page 9 refers to View 1, north from Crowd Hill to the woodland bordering the southern part of the parish. 1871 is distant (c 2km) and screened in this view (eg by Hill Copse and Nob's Crook). View 3 refers to the tree lined rural aspect between the village and Twyford, along Main Road. 2. Page 11 refers to the "green verge on which the <i>willows</i> are located in Church Lane" and can be read in conjunction with View 4 on page 10. Given the proposed set back of development on 1871, and the retention of all of the frontage <i>oaks</i>, we consider that any impact will be small, if any, and readily capable of being mitigated (and indeed enhanced). 3. Map D and the LPP2 supporting evidence confirms that there is a shortage of public open space in the southern part of the village, notably in relation to Character Area D. Development at 1871 and 2561 can resolve this. 4. Page 13 states: "travelling along Main Road, B3354, the passer-by will observe occasional small rows of houses, of mixed architecture, often barely visible behind mature trees.... semi rural and well-established". "Church Lane has a more modern street scene, with individual properties set back behind gardens at one end and hedge lined fields at the Brambridge end". 5. Page 14 provides two aspects of design guidance that 1871 can deliver: improvement of footpath links (southwards) and the retention of the willow verge (unaffected). <p>On balance, in terms of the guidance in the VDS, we consider that 1871 scores better than 2494. 1871 has less frontage than 2494, the land is flat, not rising, and there is 'spare' land to the rear to provide public open space and any required landscape mitigation. There are certainly no grounds in this evidence for major objections; and this needs to be set within the context of harm, or potential harm, to the National Park.</p>	<p>0</p>	<p>-1</p>	<p>+1</p>	
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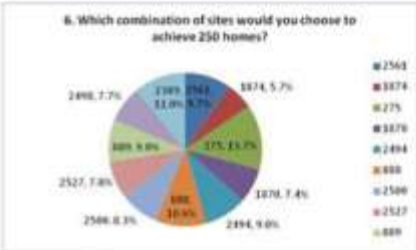
National Park	<p>The National Park is the pre-eminent landscape designation locally and has <u>national</u> significance. The precautionary principle should apply. 275 and 2494 do not need to be developed as 1871 is available and has no impact on the National Park.</p> <p>Note that the National Park Authority's October 2013 representations on landscape matters have not been taken into account in the site allocation process to date. Paragraph 115 of the NPPF states that "great weight should be given to conserving landscape and scenic beauty in National Parks...". Clearly, no weight has been given, and this is therefore a 'red flag' omission that requires urgent, remedial attention at the LPP2 EIP. This is likely to be fatal for the development potential of the northern part of the Eastern Strategy, 2494 (which, as a consequence, therefore deconstructs this strategy)</p>	-1	-1	+1	
Impact on Listed Buildings	<p>There are 3 listed buildings overlooking 2494. Three in relation to 275 (The Manor House, Barns and Stables) and 1 in proximity to 1871 (Keepers Cottage), both sites being noted in the LPP2 evidence base as being capable of being mitigated.</p> <p>The three listed buildings that overlook 2494 (and 1870) are set deep within open curtilage in the relatively open setting of the roadside landscape 'between villages'. 2494 is rising ground so the impact of development will be exacerbated.</p> <p>The listed building adjacent to (but not opposite) 1871 is surrounded by adjoining modern development and directly addresses the road.</p> <p>We conclude that 2494 is part of the rural character (noted in the VDS) and setting of the listed buildings opposite and its openness should be retained. The impact of development on the adjacent listed buildings is likely to be more significant than development on 1871.</p>	0	-1	0	
Landscape Assessment	<p>We take serious issue with the landscape work undertaken to date, especially as it has not been based on the representations made by the National Park Authority in October 2013 or indeed our attempts to seek clarification over the last 2.5 years. The National Park is, without doubt, the most significant landscape resource locally, and it deserves protection from encroachment. The National Park, protected trees, ancient woodlands, village character and listed buildings are the fundamental components of the landscape assessment.</p>	-1	-1	0	

	<p>We consider the following represent 'red flag' items:</p> <ol style="list-style-type: none"> 1. Not taking the National Park into account. 2. Issuing three (possibly more) versions of the landscape assessment with widely varying views of 1871; with a distinct negativity emerging in September 2013 after the emergence of the draft Eastern Strategy. 3. A complete lack of engagement, despite frequent requests. 4. No explanation of why 1871 is considered "highly sensitive" and 2561 "most sensitive". The former, with flat views (from the middle of the site) over electricity pylons, stands in stark contrast to the gap and village character functions of 2494 and, with 275, the impact on the National Park. <p>We note the latest Landscape Sensitivity Assessment (November 2013) includes some further detail, but the assessment is incomplete; for example it does not include photomontages to illustrate the views, it misses off views (eg from the north in relation to 1870 and travelling up and down Main Road for 2494), and it does not account for the gradient of the land, pylons and woodland cover to the south (in relation to 1871 and 2561). The assessment remains wholly at odds with the Macgregor Smith and Cordle Design work undertaken for Bloombridge. We believe the original August 2013 findings should stand, not the September of November updates:</p> <p>"Area south of Church Lane, west of Main Road, along Boyes Lane and back of housing east of Main Road"</p> <p>Context: These areas are mostly within the existing urban environment or on the urban fringe, with good connectivity to the centre of Colden Common.</p> <p>Character of site: Enclosed areas surrounded by both urban development or in some cases countryside, with good accessibility.</p> <p>Mainly contained short views due to the surrounding urban environment, or in the case of the site east of Main Road enclosed views due to Taylor's Copse. The site along Church Lane close to Upper Brambridge Farm would have long views south across the countryside.</p> <p>Important or panoramic views: none</p> <p>Skyline features: woodland</p>			
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	<p>Landmarks to connect with place: local residential development within Colden Common</p> <p>Summary of Landscape Sensitivity:</p> <p>These sites are not considered sensitive locations in terms of visual impact and biodiversity based on known constraints or the character of Colden Common as a settlement when seen in the wider context.</p> <p>In any event, we suggest that, as a result of the points raised above, a full, independent landscape appraisal of Colden Common is commissioned, in accordance with the Landscape Institute's 2013 Guidelines.</p> <p>We have quoted the City's Landscape Officer in the main body of our Planning Statement confirming that 'highly sensitive' is not a constraint to development. The southerly aspect of 1871 does, however, offer excellent potential for passive energy, solar gain and uplifting, brightly lit internal and external spaces.</p>				
Impact on Local Views & Rural Identity of the Village	<p>Questions were asked on this topic at the July 2013 public consultation. Opinions were expressed, which were broadly even between 2494 and 2561, but these views were not based on any objective assessment, as noted by Gareth Williams in his 18 September 2013 email. This is therefore a matter for the re-worked landscape assessment.</p>	0	0	0	
Impact on Established Trees & Hedgerows	<p>Questions were also asked in July on this topic; gain without any evidence being available to enable an objective assessment.</p> <p>It is worth noting that the northern boundary of 2494 comprises protected trees. There are no protected trees on 1871 or 2561. Our concept proposes that all trees will be retained, indeed the wooded verge alongside Church Lane will be enhanced.</p>	0	-1	0	
Impact on Footpaths	<p>Neither site directly impacts on footpaths. 1871 in conjunction with 2561 offers the opportunity to link the south of Colden Common with footpaths running south and east-west, thus providing access to the open countryside, which is a major benefit in line with the aspirations of the Village Design Statement. At the time of writing, 275 offers no public footpaths and any route to Colden Common Park will need to be via Main Road and Boyes Lane (c1000m walk).</p>	0	0	+1	

<p>Accessibility to the School, Co-Op and Bus Stops</p>	<p>1871 is 700m from the Co-Op, 600m from the school and 100m from the nearest bus stop, giving an average of 467m</p> <p>2494 is 1000 m from the Co-op, 1100m from the school and 100m from the nearest bus stop, giving an average of 733m.</p> <p>275 is 1200m from the school and Co-op (ie a 4.8km school walk for a parent, twice a day) and 400m from a bus stop, giving an average accessibility score of 933, outside of the normal walkability threshold.</p> <p>So far as the Co-op and school is concerned, 2494 and 275 fail the accessibility tests set in Enfusion's Sustainability Appraisal (800m) and the County Council's work for LPP2 ('adequate'). The moderating effect of the bus stop on Main Road distorts the evidence.</p> <p>[Combined score given in next category to avoid double counting on accessibility]</p>				
<p>Access 'Sustainability' Rating</p>	<p>1871 is "good" and, according to HCC's assessment so is 2494. 275 is "adequate". However, this is based on a non-standard assessment of 'walkability', which is also heavily skewed by the proximity of bus stops. A more typical categorisation is excellent (400m or 5 minutes) and good (800m or 10 minutes), as confirmed by the independent comments in the Sustainability Appraisal undertaken for WCC by Enfusion (page 3). On these tried and tested measures, 1871 scores good, but 2494 is ungraded so far as access to local facilities is concerned.</p>	-1	-1	+1	
<p>Road Safety</p>	<p>8 personal injury accidents (PIAs) on Main Road in 2011. There has been none on Church Lane.</p>	-1	-1	0	
<p>Ecology</p>	<p>1871 has no ecological constraints – in fact, page 12 of the Enfusion report identifies the potential to create additional priority habitats and therefore improve connectivity to biodiversity assets. The Colden Common Data Sets (quoted above) records that 2494 is in proximity to an area of significant ecological interest. 275 has a SINC to the north and south. 1870 is within 150m of the River Itchen SSSI and SAC, confirming the general ecological sensitivities in the northern area.</p> <p>The application for 275 has an outstanding ecological objection and is likely to cause harm to the adjoining Ancient Woodland.</p>	-1	-1	0	

Archaeology	1871, 2494, 1870 and 275 have archaeological potential for previously unrecognised remains and features associated with prehistoric occupation in the general area. This is not a constraint to development. Source: WCC Historic Environment Assessment.	0	0	0	
Agricultural Land	Neither site is Grade 1 or Grade 2 agricultural land. The groundwater NVZ south of Church Lane is not relevant once agricultural operations cease (ie the application of nitrate fertilisers).	0	0	0	
Ground Water	Site 2494 is situated on a major aquifer which is considered to be of high vulnerability. 2494 and 1870 are also in a ground water source Protection Zone 1. In contrast, 1871 and 2561 are located within a surface water drinking water protected area although it is 'not at risk'. Source: WCC Sustainability Assessment.	0	-1	0	
Flood Risk	There is no flood risk associated with sites to the east and south of Colden Common. Source: Environment Agency.	+1	+1	+1	
Mitigation	1871 offers significant areas of land (part of 2561) that is available for mitigation or to accommodate the acknowledged shortfall in public open space. There are no issues raised in the assessment of evidence that are not capable of being fully mitigated. The overall impact of 1871 is likely to be highly beneficial to Colden Common, as illustrated by the totalled score below (which is pre-mitigation). The landscape impacts, in particular, are fully mitigated by the landscape open space and planting proposed at the rear of 2561, and also the set back at the frontage of 1871 to match the existing wide verges on Church Lane. 2494 has less land, significantly more road frontage, an elevated position, and fewer connections to the open countryside. It is a difficult site to mitigate.	-1	-1	0	
The Main Road (Eastern) Strategy	This carries no weight as it was formulated before any consultation on the sustainability appraisal and before much of the evidence was available. A strategy is an output from an objective assessment of the evidence, not an input. We note that non-compliance with the Eastern Strategy was given as one of just two objections to 1871 and 2561 in Common View's draft Development Strategy.	0	0	0	

<p>Local Opinion</p>	<p>2561 scores higher than 2494, and was subject to detailed scrutiny at the July 2013 consultation, centred around a master plan presentation. In the extract below, 2561 scores 9.7% compared with 9.0% for 2494 (1871 was not scored). 2561 is recorded as 4th choice, which logically should then become third choice once the ecologically constrained 2389 is taken out. We see no basis for elevating 2494 ahead of 2561. 275 was first choice, but not by any significant degree.</p> <p>6. Residents were asked which sites they would choose to achieve 250 homes being built in the village</p>  <p>6. Which combination of sites would you choose to achieve 250 homes?</p> <table border="1"> <thead> <tr> <th>Site Number</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>2561</td><td>9.7%</td></tr> <tr><td>1874</td><td>1.0%</td></tr> <tr><td>275</td><td>13.7%</td></tr> <tr><td>1870</td><td>1.0%</td></tr> <tr><td>2494</td><td>9.0%</td></tr> <tr><td>888</td><td>11.0%</td></tr> <tr><td>2500</td><td>8.3%</td></tr> <tr><td>2527</td><td>7.8%</td></tr> <tr><td>889</td><td>1.0%</td></tr> <tr><td>2389</td><td>8.7%</td></tr> <tr><td>2498</td><td>7.7%</td></tr> <tr><td>1871</td><td>0.0%</td></tr> <tr><td>1874</td><td>5.7%</td></tr> </tbody> </table> <ul style="list-style-type: none"> □ 275, 2389, 888 are prominent choices □ 2561 is 4th choice □ 1870 and 1874 are least chosen 	Site Number	Percentage	2561	9.7%	1874	1.0%	275	13.7%	1870	1.0%	2494	9.0%	888	11.0%	2500	8.3%	2527	7.8%	889	1.0%	2389	8.7%	2498	7.7%	1871	0.0%	1874	5.7%	<p>+1</p>	<p>-1</p>	<p>0</p>	
Site Number	Percentage																																
2561	9.7%																																
1874	1.0%																																
275	13.7%																																
1870	1.0%																																
2494	9.0%																																
888	11.0%																																
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889	1.0%																																
2389	8.7%																																
2498	7.7%																																
1871	0.0%																																
1874	5.7%																																
<p>Other Criteria?</p>	<p>We believe the above list is exhaustive and that there are no other relevant site selection criteria.</p>	<p>0</p>	<p>0</p>	<p>0</p>																													
<p>TOTAL SCORE</p>		<p>-3</p>	<p>-10</p>	<p>+5</p>																													

Notes:

1. By '**red flag**' item, we mean that this is a serious omission in the analysis to date which ought to halt any further recommendations until the matter has been resolved. In essence, a 'red flag' requires a reassessment of both the development strategy and the proposed site selections.
2. We believe the above, tabulated list of criteria captures all of the significant decision making criteria. If we have missed anything of significance, we would be pleased to hear from Common View or the City Council.
3. The simple scoring system provides a clear, compelling recommendation, based on an objective assessment of the evidence. 1871, suitably extended if necessary, is of a similar scale to 2494, and has substantially more benefits, and demonstrably fewer impacts (especially in relation to critical constraints such as the nationally significant National Park and road safety). It also scores better than 275, especially given the adverse impacts associated with the current proposals for 165 units.
4. Our scoring system adopts a standard methodology and is as follows:
 - **Very Poor** (-2): Significant, Long Term Negative Impact.
 - **Poor** (-1): Significant Medium Term Impacts, possibly improving in the longer term.
 - **Neutral** (0): Minor or Short Term Impact/Benefit.
 - **Positive** (+1): Significant Medium Term Benefit, possibly improving over time.
 - **Very positive** (+2): Significant Long Term Benefit, possibly improving over time.
5. This version of our document will be updated and added to as evidence is refined and as further information is made available.

APPENDIX 2: INDEPENDENT EXPERT ANALYSIS OF COMMONVIEW RESULTS

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Date: 16th May 2016

Mr Richard Cutler
Bloombridge
4th Floor, Venture House
27-29 Glasshouse Street
London, W1B 5DF

Ref: Land at Church Lane, Colden Common; Planning Application Ref. 16/00819/out

Dear Richard

You have asked me to review a number of documents relating to the above application and, in particular, the process and output from a community engagement exercise in Colden Common, held on 21st July 2013. I have now undertaken this review, and discussed both at length with you. I understand that the results of the community engagement exercise were used to inform decision making at the Parish Council Meeting held on 2nd October 2013 and, with further consultation in November 2013, these results drove the final Development Strategy adopted by the Parish Council on 3rd March 2014.

The community engagement exercise was a laudable expression of Localism, and it clearly had success in terms of the level of engagement achieved. However, you have asked me to review the veracity of the process and the results of the exercise. My thoughts on this are less complimentary. Overall, I have concluded that the questionnaire used in the community engagement was not sufficiently precise or robust, and the analysis of the results lacked objectivity and proportion. This seems, in my view, to call into question their value to decision making.

Analysis

The starting point for my analysis is an email from Gareth Williams of Winchester City Council, dated 18th September 2013. I understand that Mr Williams was the Lead Officer for the Colden Common components of LPP2. The email was disclosed after a Freedom of Information Act request and was reproduced in Bloombridge's Planning Statement at paragraph 2.24. It was sent to a redacted party but copied to Steve Opacic (Head of Planning) and Richard Izard (District Councillor and Chair of the Parish Council). This email states the following.

You need to bear in mind that you are presenting residents' opinions on the questions (or rather, statements) put to them. Most of the questions/statements are quite complex and it is feasible that each component could give a different answer. Take Q1 for example. This includes three distinct elements, each capable of a very subjective response: "adversely impact" (how adverse? minor/major/significant/capable or incapable of mitigation?); "local views" (to whom?), and "rural identity" (everyone will have a different concept of this). It follows, therefore, that the responses must be treated with considerable caution, as the survey did not afford residents the opportunity to say why they agreed or disagreed to any great extent. This needs to be carefully considered where you conclude on the responses.

Using Q1 as an example, the conclusions set out beneath the chart of results (slide 4 of the presentation) are flawed. You cannot say with any authority that sites 275 and 888 "would not

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adversely impact" local views etc. That will be a matter ultimately for decision-makers in allocating the site(s) in the Local Plan and in consideration of a detailed planning application.

Having reviewed the work published by the local engagement group ('Commonview') between February 2013 and March 2014, I concur with these observations. There are significant flaws and considerable caution should have been applied. The survey is not suitable for evidence-based decision making and it should therefore not have been used to support the so-called 'Eastern Strategy', including the changes made to this strategy following the consultation in November 2013.

The results were presented to the Parish Council on the 2nd October 2013. Looking at the Power Point presentation, I note the following points.

1. **Questionnaire** Bloombridge submitted two sites for consideration on 21st July 2013, but only the combined site (recorded as 2561) was assessed. Residents were not asked to rate, separately, the smaller frontage site, 1871 (which is now the subject of a planning application for 21 units). The questionnaire shows 1871/2561 as the largest site (for 141 units), with Sandyfields (275) proposed for 97 units (in line with the SHLAA capacity assessment). The Bargate land holdings (1870 and 2494) are split. Given that some sites were as small as just eight units, this is likely in my view to have had a distorting effect. It is regrettable that the questionnaire did not pose a question on mitigation or seek views on 'community benefits' (e.g. the shortfall in public open space).
2. **Page 2** There is insufficient explanation on how the questions were formed or indeed what each developer needed to present on the day (to ensure a level playing field). It would have been helpful to have included 'baseline' information (e.g. the maps in the Village Design Statement) to inform the views expressed by residents, e.g. in relation to the National Park. I see that Site 2389 was excluded at the end of the process (it is a SINC), but it was generally a popular site. This illustrates an anomaly in terms of data collection and helps to undermine the objectivity of the views expressed.
3. **Page 3** Nine questionnaires were not entered for analysis and there was some data cleansing. It would be useful to see all questionnaires published to ensure full transparency.
4. **Questions 1 to 5 (Generally)**. These deal with local views, rural identity, trees/hedgerows, footpath network and integration and access to village amenities. First, it should be stressed that the results only reflect subjective opinions as no hard data were available. For example, you advised me that the results for Question 4 (on accessibility) bear no relationship to the accessibility scores published by the County Council (e.g. 275 is 1,200m from the Co-op and school, which is substantially beyond the established walkability criterion of 800m (as set out in LPP1 Policy CP10); yet residents scored 275 as more favourable than 2561. Secondly, and importantly, there appears to have been no input on what might be described as 'overriding' constraints, such as the National Park, SSSI, SINC, Ancient Woodland, ecology, highway safety and possibly (but more subjectively) the 'key landscape features' specified in the Village Design Statement. These questions also fail to distinguish between smaller (e.g. 2494 with for 42 units) and larger sites (e.g. 2561, incorrectly, with 141 units), when it is likely that smaller sites will have a proportionately smaller impact. Such issues present, in my view, a flaw in the analysis due to a lack of weightings in the questions posed.

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5. **Questions 1 to 5 (Continued).** Looking at the analysis tab in the spreadsheet provided by your Freedom of Information Act request, I am happy to confirm, for the avoidance of doubt, that the data has been processed without major errors. However, as I have already explained, the methodology (i.e. the questions asked) does not support the conclusions drawn. The results could equally be used to justify the development of, say, 2561 on the basis that for every question at least 50% of respondents (over 100 people in each case) responded affirmatively. This is a significant number of votes (in favour of by far the largest site – at the time).
6. **Question 1** You have informed me that no landscape or visual impact information was available to inform the responses to this question, and no reference was made to the National Park, by far the most important landscape asset for Colden Common. Map D of the Village Design Statement could also have been used as a reference point for this question.
7. **Question 2** It would have been helpful for Map D of the Village Design Statement to have been used as a reference point for this question as this shows housing greens, protected hedges, the historic park and TPOs.
8. **Question 3** Map D of the Village Design Statement shows the local footpath network. It is unclear how 2561 impacts on these footpaths. You have informed me that a major new north-south footpath is proposed, thus indicating the importance of mitigation measures in the site selection process, which does not appear to have been covered by the questionnaire.
9. **Question 4** – The answers to this question, as I have already mentioned, underscore the subjectivity of the overall exercise. The County Council's accessibility evidence should have been available in July 2013. I agree with your suggestion that, as an alternative, the workshop could have been re-run, but with a composite constraints and opportunities plan and site master plans, and perhaps with Questions 8 to 14 being given some weight. This could have taken place in November 2013.
10. **Question 5** – With 51% of residents disagreeing with the proposition that 2561 should not be developed, it cannot reasonably be concluded that this site should not be developed. We note that 2494 scored c56%, yet this site was still included in the 'Eastern Strategy'. In terms of the number of votes, 2561 and 2494 both scored 116 votes, but 2494 scored a higher percentage because it received a total of 204 votes compared with 227 for 2561 (introducing another variable to complicate comparisons).
11. **Question 6** – This would appear to be the key question, albeit that no single site could accommodate the proposed 250 units. While the Parish Council proposed the so-called 'Eastern Strategy', it is interesting to note that the data show that of the 119 votes for 2561 under this question, 68% (81 votes) were for 275, suggesting the potential for an alternative strategy – i.e. combining 275 and 2561. You have pointed out to me that this is a particularly compelling statistic, in the context of the decision arising out of the November 2013 consultation, to abandon 2494 and add the 42 units to Sandyfields (275). I concur with your observation that 2561 should have received these 42 units. This is underscored by the fact that the pie chart in the results records 9% support for 2494 (110 votes) versus 9.7% for 2561 (119 votes), with 275 scoring just 4% more with 13.7%. This 4% comprises 49 ticks/votes out of 'total ticks' (from 270 respondents) of 1223; again, reiterating that residents favoured a dispersed strategy (on average ticking $1223/270 = 4.5$ sites each).

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I note that 2561 is recorded as '4th choice', but that 2389 is a SINC and 888 has capacity for just 39 houses. This suggests that 2561 ought to be ranked 2nd choice, and taken forward in combination with 275.

12. **Summary** – It seem to me that the method of ranking the scores for each site conceals minor differences/scores between sites, and it does not distinguish between large and small sites, where the latter will generally have less impact given the nature of the questions posed. Moreover, I cannot understand how the conclusion that “*residents are mostly averse to sites 1874, 1970, 2500 and 2561*” is reached. For example, 50% or more of residents voted affirmatively for 2561 on every question; how can this be “*mostly averse*”?

The bar chart is based on a composite of total rankings, not the scoring system of 1 (strongly disagree) to 5 (strongly agree). The y-axis (from 0–60) is therefore meaningless and does not support the conclusions drawn. However, with 2389 (SINC), 2489, 2494 (rejected by the November 2013 consultation) and 2527 removed from the bar chart, I note that 2561 is the next plausible site in line. It is also the case that if an average of all scores is calculated, then 2561 records 2.94 and 275 records 2.14, suggesting that 2561 is ‘neutral’ (i.e. 3 is the mid-point of the 1 – 5 ranking system deployed), and this is not markedly different from 2.14 (where a ‘perfect score’ would be 1).

In light of these detailed comments, I find the concluding statement, that “*a proposal for Main Road development is in line with all findings*”, is statistically incorrect, and goes well beyond the actual findings. I can find little evidence for the basis for this conclusion and, in light of the fact that Gareth Williams pointed this out to the Parish Council Chairman and Head of Planning before the results were presented on 2nd October 2013, it is exceptionally odd that the ‘Eastern Strategy’ was taken forward. In terms of the eight bullet points used to justify the concluding statement, I would add the following.

- *Development is in one area* This was not a proposition put to residents and, in spite of this, it seems that the results suggest that there was support (on average) for a strategy comprising 4.5 sites, i.e. dispersal).
- *Clear support from residents* The results do not show a significant difference between the top few sites, including 2561.
- *In line with Local Plan Part 1* I am not aware of any evidence in support of this statement, nor did the consultation exercise include any policy analysis, e.g. by reference to Policies CP7 (landscape and open space), CP10 (accessibility) and CP19 (National Park).
- *Sites are in line with findings from; landscape assessment, open space assessment, site assessments, VDS* This is an evidential statement beyond my remit, but I note that the evidence was not available until after the July 2013 consultation, and it is surprising that there is no mention of the National Park.
- *Sites are close to existing recreational facilities* You have advised me that 275 is 920m from Colden Common Park, which is beyond the 650m threshold required by the City’s Open Space Standards).

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- *Little impact on street scene* This is an evidential statement beyond my remit, but I note that no assessment was made based on this criterion as part of the July 2013 consultation.
- *Little impact on traffic through the village's roads* Another evidential point not proven by the questionnaire.
- *Sites are integral to enable new residents to feel part of the village* The accessibility criteria do not support this statement.

A further consultation exercise was held after the Parish Council Meeting on 2nd October 2013, closing on 30th November 2013. I understand that this sought written comments on the 'Eastern Strategy', but this time no public event was held, nor was a master plan published in support of the strategy. Only 32 responses were received, 13 of which supported the strategy, with the remainder objecting largely to 2494 and 1874. As a result of objections to 2494, it was dropped as an option, and Site 275 was increased in size from 125 to 165 units.

I am unclear how the revised 'Eastern Strategy' (i.e. 165 units at Site 275) is supported by the results of the July 2013 consultation or, indeed, the further consultation that closed on 30th November 2013. Given my analysis of the results, I am perplexed as to why the potential of 1871 and 2561 was not revisited as 'reasonable alternative' options to increasing further the density of Site 275.

Conclusions

It seems to me that the engagement exercise failed to produce a statistically robust and thorough set of results based purely on the data collected. There seems to be a mismatch between the questions posed and results published. This calls into question the validity of the results in terms of their use in influencing the Development Strategy.

My conclusions are therefore as follows.

1. While well-intentioned, the output from the community engagement survey should be treated with considerable caution, as the results lack statistical robustness. On this basis, the use of the survey results by the Parish Council (and subsequently the City Council) as a basis for decision-making seems to be compromised.
2. The questions posed at the engagement workshop on 21st July 2013 were not sufficiently precise or robust. The consequence of this is that the results are not definitive (or even informative). This seems to support the Bloombridge contention that the results cannot be used to inform decision makers to any material degree; particularly not as a basis for choosing between the various LPP2 sites and making judgements based on sustainable development criteria.
3. The analysis of the results lacked objectivity and proportion owing to the focus on percentages (not number of votes) and the failure to consider statistical significance, or the statistical weighting that could have been accorded to different factors and different sized sites.
4. Even if the results are taken at face value (e.g. without any weighting of questions), there is no material difference between the top 2-3 sites (i.e. including 1871/2561). Eleven votes (4%), on the key question of which site can accommodate 250 houses, in a village of c3,800 people, is not statistically representative. Rather than supporting a single large site (the so called

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'Eastern Strategy'), the results could equally be used to support a strategy that disperses small sites throughout the village, which was the original preference that Commonview expressed in February 2013.

5. There is a disconnect between the results, analysis and Development Strategy and a general absence of evidence at the time when key site selection decisions were made. I agree with you that it is difficult to understand why 1871/2561 was not revisited in November 2013 when 2494 was found to be unpopular. There is nothing in the results that would seem to preclude that from happening.
6. Overall, and as already stated, the issues raised in this letter call into question the validity of the results of the engagement exercise and, therefore, their use as evidence in decision-making on the Colden Common Development Strategy.

It is for others to make the case, on the evidence, for one large site versus a number of smaller dispersed sites around Colden Common. However, I would stress that for LPP2 to be **sound** the Development Strategy for Colden Common (expressed as Policy CC1) needs to be **positively prepared**, based on **objectively assessed development requirements** and **justified** as the most appropriate strategy when considered against the **reasonable alternatives**, based on **proportionate evidence** (paragraph 182 of the National Planning Policy Framework).

Next Steps

While my conclusions here are clear and, in my opinion, beyond dispute, I would encourage you to foster a dialogue in order to reach a **Statement of Common Ground** for the purposes of LPP2.

Yours sincerely,

Dr Rob Harris
Principal
Ramidus Consulting Limited

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Steve Opacic

From: Gareth Williams </o=wcs/ou=winch/cn=recipients/cn=gwilliams>
Sent: 18 September 2013 12:58
To: Steve Opacic
Cc: Steve Opacic; Richard Izard Home
Subject: RE: Commonview: analysis of 21st July Resident Feedback
Attachments: (golden common gls site survey responses.pdf) stubbed.htm; (image001.gif) stubbed.htm

From my equally inept statistician's view, I can see nothing wrong with the analysis of Qs 1 to 7 of the questionnaire. What you are showing in the charts is a fair representation of the views expressed by respondents. I'm afraid I don't really have the time (or probably the expertise) to do the analysis of Qs 8 to 14, but if you are as diligent with that part of the survey as you have been so far, I don't see any problems.

I do have some concerns, however, about the presentation of the findings. You need to bear in mind that you are presenting residents' opinions on the questions (or rather, statements) put to them. Most of the questions/statements are quite complex and it is feasible that each component could give a different answer. Take Q1 for example. This includes three distinct elements, each capable of a very subjective response: "adversely impact" (how adverse? minor/major/significant/capable or incapable of mitigation?); "local views" (local to whom?); and "rural identity" (everyone will have a different concept of this). It follows, therefore, that the responses must be treated with considerable caution, as the survey did not afford residents the opportunity to say why they agreed or disagreed to any great extent. This needs to be carefully considered where you conclude on the responses.

Using Q1 as an example, the conclusions set out beneath the chart of results (slide 4 of the presentation) are flawed. You cannot say with any authority that sites 275 and 888 'would not adversely impact' local views etc. That will be a matter ultimately for decision-makers in allocating the site(s) in the Local Plan and in consideration of a detailed planning application. I would suggest, therefore, that either you omit these comments and merely 'talk to the slide' pointing out the various percentages, or include a strictly factual statement of which were the strongest agreements/disagreements in respect of particular sites. This principle would also apply to Qs 2 to 5.

The summary chart (slide 8) is a very useful one and clearly shows the most and least favoured sites. On that basis, we have prepared a map showing the 11 sites in the survey 'ranked' in this way (3 groups of 3, and 1 of 2). This is attached and, I believe, would help the audience identify the sites which were the subject of the survey, and what residents think of them. This could usefully be part of the presentation after slide 8. [Would this suffice regarding your request for a map in your email last night?]

The table of results in slide 9 (Q7) will be too difficult to read, even when projected. You may wish to consider a different format.