



For office use only
Date <input type="text" value="21/09/14"/>
Ref No.
<input type="text" value="REP 21/2"/>
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# Gosport Local Plan 2011-2029 Publication Version Response Form

Town and Country Planning (Local planning)(England) Regulations 2012 Regulation 19 Consultation

### Data Protection

Gosport Borough Council is registered under the Data Protection Act 1998. The information that you provide in completing this form will only be used by the Council in the development of the Gosport Local Plan 2011-2029. Please note that the completed form is a public document and as such will be made available for inspection and placed on the Council's website (personal details other than name of organisation/individual will be removed from version published on internet) and kept as part of the supporting documentation relating to the Local Plan.

**Name:**

**Agent Name:**

**Organisation (if applicable):**

**Agent Organisation (if applicable):**

**Address:**

**Agent Address:**

**Post Code:**

**Post Code:**

**Telephone:**

**Telephone:**

**Email:**

**Email:**

Gosport Borough Local Plan 2011-2029 publication version document is available to view on the Gosport Borough Council's website: [www.gosport.gov.uk/localplan2029](http://www.gosport.gov.uk/localplan2029)

If you would like to discuss any element of the consultation documents further then please contact/telephone Planning Policy 023 9254 5228

Print or Save as a copy of this form for your records

All comments and completed forms should be returned by  
**22nd September 2014**

Completed forms can be submitted here   
or emailed to [planning.policy@gosport.gov.uk](mailto:planning.policy@gosport.gov.uk)  
or by post to

Planning Policy Gosport Borough  
Council Town Hall  
High Street  
Gosport  
Hampshire  
PO12 1EB

If you would like to make another representation on the GBC Local Plan 2011 - 2029 Publication Version, please click the Save as button to save the current representation or Submit.

You may then use the Clear form button to start a new representation.

Paper copies of the [response form](#) are available from the council's website, in the libraries and at the Town Hall (3rd floor reception).

Comments will be considered by an inspector approved by the Secretary of State who will hold an examination into the local plan in terms of its legal compliance and 'Soundness'.

Further information on these terms is contained in the [Council's Guidance Notes](#) for making representations. Comments should focus on matters of soundness. These are defined in the National Planning Policy Framework and are reproduced below.

**Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

**Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

**Effective** - the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and

**Consistent with National policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1. To which part of the Local Plan does this representation relate?

Chapter	<input type="text" value="12"/>	Paragraph	<input type="text" value="79,81,82,83"/>	Policy	<input type="text" value="LP43, 44"/>
Policies Map	<input type="text" value="16"/>				

If you would like to make further comments on the GBC Local Plan 2011 - 2029 Publication Version, please use a separate form for each representation you wish to make.

2. Please indicate under what grounds you wish to submit your representation

- 2a Support  
*(if you have entered Support, please continue to Q8.*
- 2b Not Legally Compliant
- 2c Not Sound

3. If you consider the Local Plan is not sound, please identify which tests of soundness your response relates?

- 3a Positively prepared
- 3b Justified
- 3c Effective
- 3d Consistent with National Policy

4. Please give details of why you consider the Local Plan is not legally compliant or not sound?  
*(please be as precise as possible)*

See attached response

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, with reference to the answer you have identified in Q3.  
You will need to say why this change will make the Local Plan sound.

The proposed "SINC" and "Open Space" status should be removed from the Northern Site of Priddy's Hard nature conservation area in the draft 2011-2029 Gosport Local Plan

6. If your representation is seeking a change, can your representation be considered by written representations or do you consider it necessary to participate at the oral part of the Examination?

No I do not wish to participate in the examination hearings

Yes I do wish to participate in the examination hearings

7. If you wish to participate, please outline why you consider it necessary.  
*(please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination).*

As owners of the land in question we have the responsibility for security, management, protected wildlife, historic buildings and TPO trees. We also have the financial costs involved in all the points mentioned. We should be able to have a say on the future implications of this site

8. If you wish to support the legal compliance or soundness of the Local Plan please use the space below to provide detailed comments.

9. Do you wish to be notified at the address/email stated on page 1 of any of the following:

- a. That the Local Plan has been submitted for independent examination
- b. The Inspector's report has been published
- c. The adoption of the Local Plan

*please tick*



Thank you for filling in this form please return to Page 1 to Submit and/or make another representation

Page 1

20<sup>th</sup> September 2014

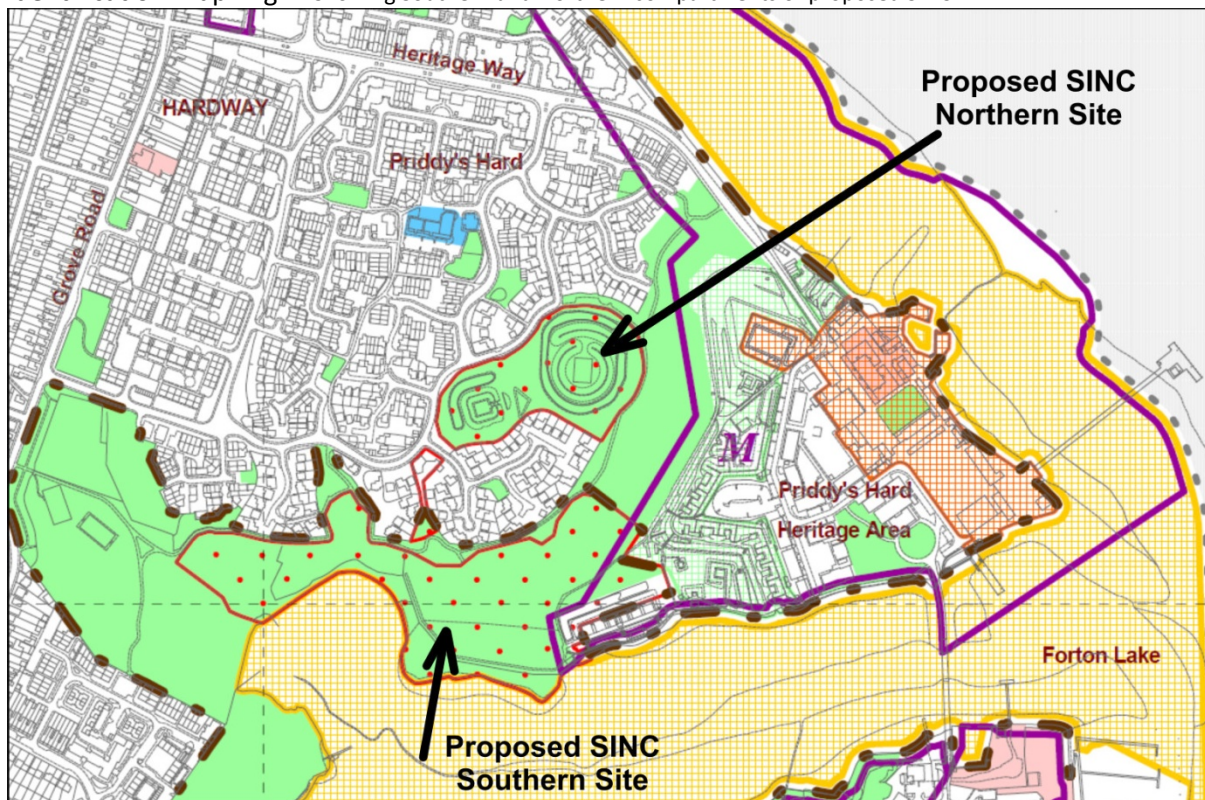
### Objection to Gosport Town Plan 2011-2029

Consultation: Period from 12<sup>th</sup> August to 22<sup>nd</sup> September 2014

Item of Objection: The Northern site or compartment of Priddy's Hard SINC. (site of interest for nature conservation) (SU612301224)

Ownership: Alan & Siegrid Dawes and their company Kenzington Limited purchased the two former cordite magazines in March and May 2014 at public auction. The remaining and majority of this land was purchased in July 2014

Identification Map. fig 1. Showing Southern and Northern compartments of proposed SINC



### Introduction and Objection

In the Gosport Borough Council's 2011-2029 proposed Local Plan, the Council propose to designate Priddy's Hard Nature Conservation Area (SU61250102(60-0205)30082007) as a SINC and Open Green Space

This Nature conservation area comprises of two sites, referred to in this report as the Northern and Southern Sites or compartments (as shown on fig 1.) Whilst we have no objection to the Southern Site being included as a SINC., we object to the Northern Site being included for the reason it is not Sound, nor is it justified.

The primary basis for this decision by Gosport Council is the HBIC 2007 survey and report (Hampshire Biodiversity Information Centre)

## Background

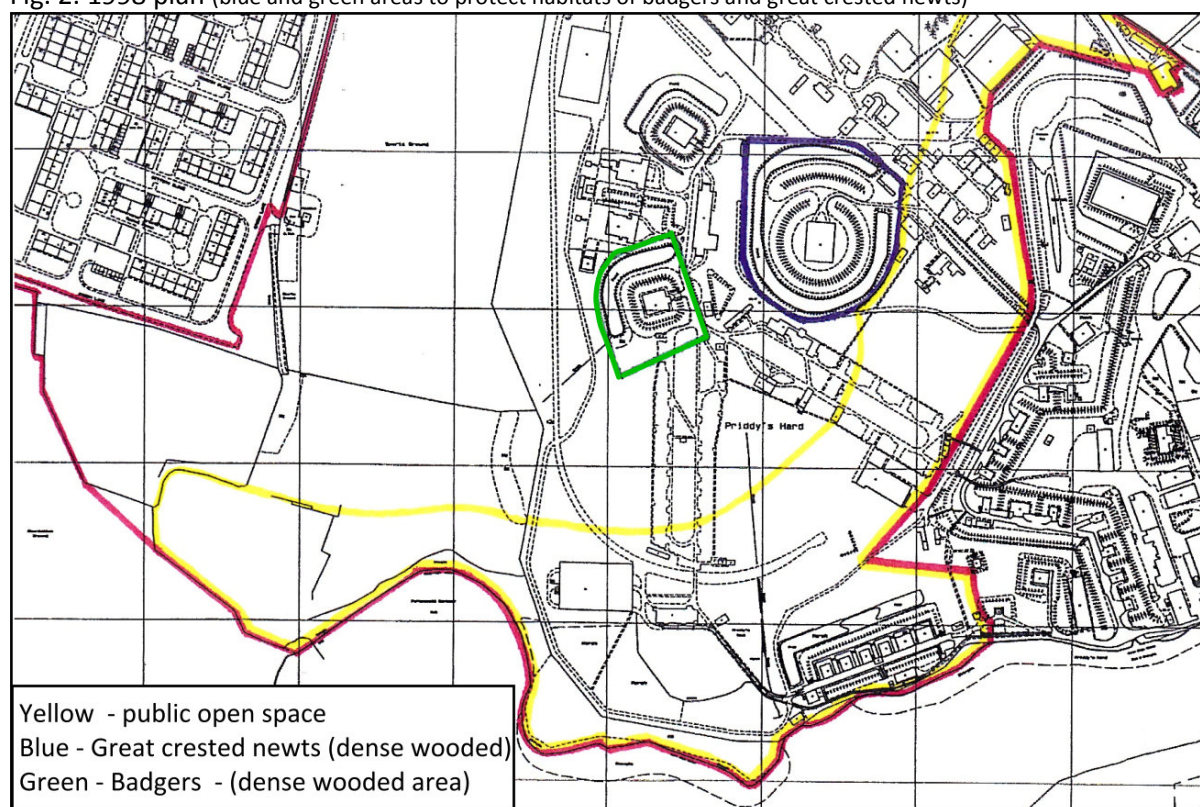
In 1998 Gosport Council's gave planning consent to build 700 new houses which was mitigated by a section 299 agreement to protect the blue, green and yellow areas from any encroachment from the construction of these 700 new houses. (See fig.2. and S.299 agreement 1.1.2 - 1.1.4 and on page 8, the 3<sup>rd</sup> schedule)

In the 2006 Gosport Council's Local Plan, it increased the nature conservation site to include the land between the green and blue areas together with other surrounding areas. (as seen fig.1.) The green and blue areas also contain substantial former cordite magazines built 1899. This site was not designated as Open Space in the Local Plan.

In 2007 HBIC carried out a survey and report . They identified the area as a northern and southern compartments similar to that in fig.1 It was subsequently recorded as a SINC by HBIC.

In the 2011-2029 Local Plan, it is proposed to embrace the findings of the 2007 HBIC report and to designate both Sites formally as a single SINC. (as shown in fig.1) In addition it is proposed to make the site "Open Space"

Fig. 2. 1998 plan (blue and green areas to protect habitats of badgers and great crested newts)



## Reasons for Objection - Ecology

Gosport Council's decision is based on the evidence presented in Hampshire Biodiversity Ecology report of 2007 which refers to the two sites as compartments, a northern and southern. HBIC states the reason for listing these two sites as a SINC is based on protected plants that are **only** found in the Southern Site. So we agree the Southern site can be a SINC but we oppose the Northern Site being a SINC as no protect plants have been recorded. The Northern and Southern Sites are unlikely to sustain the same plants for the following reasons :- They are not physically connected and:

**The Southern Site is:**

Open space. Coastal grassland and salt marsh. Predominately unfenced. Open to public. Without buildings. Outside the Urban area of Gosport. Under management by Greenbelt, a conservation company.

**The Northern Site is:**

Mostly dense woodland. The site is dominated by two large ex cordite magazines. Fenced in by 2m high fence. Within Gosport Urban area. Privately owned and funded. Not open to the public.

In other words the two sites are worthy of separate listings and not automatically parcelled together. The regulations already in place for the separate blue and green areas shown in (fig 2.) are sufficient to protect the habitats of the badgers and newts. It is not necessary to continually expand and add more regulations. The additional designations are therefore both excessive and not justified

**Historic Buildings**

Adding SINC status unnecessarily interferes with the interest for the use of two historic former cordite magazines which is part of the heritage of Gosport. There is significant imbalance in the town plan to continually focus on the nature of the site without any consideration or statement as to how important buildings can be used in harmony with protecting wildlife habitats

**Financial**

Making excessive unnecessarily rules without any financial responsibility is not affordable without funding. As owners of this private land we need to balance not only the issues of wildlife but also that of the historic former cordite magazine, the TPO trees and security of the site. Upholding the existing regulations for conservation of habitats for badgers and newts will be financed and maintained by the current owners

**Security**

The Northern compartment is currently fenced in with 2m high wired fence. This might introduce the impression there is something special behind needing strict protection but the fence was not erected for this purpose. The need arose to insure that playing children couldn't get injured owing to the remains of old buildings, concrete ducting channels, moats as well as fires being started for which the fire brigade was called out several times.

**Open Space**

As Owners of the land in question, we object to our private land being listed as "Open Space". It is not so recorded in the 2006 Local Plan. This action by Gosport Council has been without consultation with the owners and is excessive and not justified.

**Conclusion**

The proposed "SINC" and "Open Space" should not be designated to the Northern Site of Priddy's Hard nature conservation area in the upcoming 2011-2029 Gosport Local Plan