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12th October 2024

SENT VIA EMAIL - planningpolicy@winchester.gov.uk

Dear Sir/Madam

Response to Winchester City Council (WCC) Consultation Reg 19 draft Local Plan 2040

Hampshire Hospitals NHS Foundation Trust (the Trust) welcomes the opportunity to comment on the 'Regulation 19' consultation documents issued in respect of the proposed Winchester District Local Plan 2020-2040. It congratulates the City Council on the clarity and quality of the consultation document and web pages.

The Trust has reviewed all the consultation material and offers these comments as a coordinated response.

The Trust remains supportive of the ambitions and objectives outlined in the planned Strategic Policies and priorities and looks forward to continuing engagement during the next stages of plan making.

Carbon Neutrality

The Trust remains fully supportive of the WCC objective to achieve carbon neutrality by 2030 and to encourage others to do the same. This continues to broadly align with the NHS net zero and HHFT Green Plan targets of 2040 and 2045. The Trust will continue to welcome direct engagement with the City Council, the University and other public sector bodies on collaborative projects.

Strategic Policy CN1

The Trust is committed to achieving Net Zero Carbon by 2040 and is keen to support WCC's aspiration for new developments to meet this standard across the metrics identified. Where staff (for example) are concerned, the Trust would welcome discussion and support from WCC to enable accessible and affordable travel and transport alternatives to car use, as the discounted parking at Park and Rides offered during covid. The Trust would be keen to support moves towards carbon zero healthy forms of onward travel from these hubs.

Strategic Policy CN2

The Trust continue to strongly support a fabric first approach to design to reduce energy demand and running costs. We assume WCC will appreciate and accept that this will see materials proposed that do not necessarily align with traditional aesthetic aspirations. The Trust continues to seek reassurance that this is understood and acceptable to WCC.

Strategic Policy CN3

The Trust note the expansion of detail in this policy concerning achieving BREEAM Excellent certification; this continues to align with NHS Policy. However, the Trust wish to object that the policy has not been amended to reflect that the NHS allows reasonable derogation where overriding healthcare demands dictate.

Strategic Policy CN3

The Trust remain likely to support any renewable and low carbon energy scheme arising. The Trust has a plan for decarbonisation of the RHCH site based on electrification and renewables. Investigation has suggested that the DNO network is already under huge pressure and sufficient capacity will not materialise until post 2031. Notwithstanding that a focus on on-site energy may reduce the reliance on the wider network, the Trust are a major energy consumer and there may be instances where on-site energy generation is not sufficient. The Trust therefore request more a more robust response to potential mitigation; this could be captured in Policy W11.

Strategic Policy CN6

Ground Source, Air Source and Solar remain expected to play a vital part in the Trusts own plans to decarbonise existing sites and contributing to creating health environments. The Trust welcomes the removal of the reference to avoidance of impacts on the architectural significance of buildings. Nevertheless, the Trust remains concerned that the wording of this policy continues to put undue emphasis on historic significance.

Investigations suggest that the DNO network is already under huge pressure and sufficient capacity to support such a shift will not materialise until post 2031. The Trust remain concerned that this has not been given sufficient weight by WCC. For these reasons, while the Trust support a move to Ground Source, Air Source and Solar, the Trust **objects** to the wording of this policy as written.

Well Designed Spaces

Strategic Policy Spaces D1

The Trust continue to fully support WCCs aspiration to promote health, social and cultural wellbeing through good design that encourage 'staying well' through walking, cycling and other health activity. The Trust support updates to Policy D1 that require the use of high-quality durable materials appropriate to context and building design.

Sustainable Transport and Active Travel

Strategic Policy T1 T4

The Trust continue to support SP T1. Offering genuine choice of sustainable and active travel modes remains likely to benefit our staff and some patients to access the hospital, with benefits from walking and cycling and the potential reduction in air pollution. The Trust wish to restate that they will need the support where practicable, to move away from the use of cars when coming to site.

The previous focus in the Regulation 18 Local Plan on creating connected 15-minute neighbourhoods was supported by the Trust. The Trust remain enthusiastic to work with WCC on the updated 20-minute neighbourhood focus. The Trust would like to continue to strengthen dialogue around active travel corridors, increase walking and cycling and access to public transport services and infrastructure. The local park and ride bus service is well utilised by Trust staff and patients, and we continue to welcome any further park and ride developments that may come through increased development in the local area.

The Trust's catchment being a mix of urban and rural communities, we recognise that access to public transport is not readily available to all, it is therefore welcomed that the policy now requires that sustainable and active travel routes be suitable for those with disabilities and reduced mobility.

The Trust remain interested in working more closely with WCC to reduce our mutual carbon footprint. Presently there are no attractive, direct cycle routes to the hospital, therefore the Trust would welcome understanding more about the central LCWIP and also have involvement in the development of the wider district LCWIP. As an organisation with a large volume of deliveries throughout the working week, the Trust is considering options regarding 'last mile' delivery and would be very interested in further discussion about the suggested implementation of 'vehicle hubs'.

Strategic Policy T3 T4

The Trust continue to support the principles of this policy, including prioritising 'parking' for active and e-mobility travel as well as the provision for charging of plug in and other ultra-low emission vehicles in safe, accessible and convenient locations. The Trust support provision of measures for people with reduced mobility and will look to mitigate inequality of access to all modes of travel for people with disabilities and reduced mobility.

Biodiversity and the natural Environment

Strategic Policy NE1 NE3 NE5

The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies.

The Trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individuals' health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.

The Historic Environment

Strategic Policy HE1 HE2 HE8 HE9 HE14

The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.

The Trust reiterates its Reg 18 position that that certain historic and socially important **continuous building uses** be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust **objects** to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.

Creating a Vibrant Economy

Strategic Policy E3 E4

The Trust continues to support the aspiration to maintain and enhance the role of centres. Healthcare uses would be more easily accessible in some cases and are potentially mutually beneficial to other uses in town centres. The Trust would be pleased to explore potential as appropriate.

University of Winchester / Royal Hampshire County Hospital

Strategic Policy W11

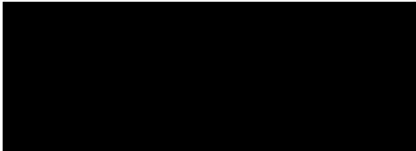
The Trust continues to welcome the inclusion of a policy specifically covering Royal Hampshire County Hospital. The Trust previously noted that the Regulation 18 Local Plan documents stated that '*if decisions are made by the Health Authorities which result in land becoming available.....*' It is important to note that all options currently being discussed with the Department continue to see retention of services at RHCH although the scope of these services may change, and the Trust are exploring the potential to produce an updated site masterplan. The Trust are enthusiastic to work collaboratively with WCC in this respect to secure long-term investment in the site. No decision has yet been made and approvals at national level will dictate the extent of system wide investment and if land will become available for alternative uses.

The Trust are enthusiastic to collaborate with Winchester City Council to develop a Healthcare and Operational Masterplan. However, the Trust **objects** to the implied reference within Policy W11 that a (singular) joint masterplan is expected, covering both the Royal Hampshire County Hospital and University of Winchester assets. The Trust propose that a bespoke healthcare masterplan would be more appropriate, considering that there will be differences in funding, delivery pressures, impacts, and mitigations between the Trust and the University. Notwithstanding, the Trust are willing to cooperate with the University to find synergies between bespoke Royal Hampshire County Hospital and University of Winchester masterplans.

Taking into account the response to Policy CN3, the Trust suggest that Policy W11 make specific provision and allowances for instances where on-site energy generation is not sufficient to power a proposed development.

We thank you for the opportunity to support and comment on these stimulating proposals and look forward to continuing to work closely together as our organisations progress towards these mutual shared goals.

Yours sincerely



Signed on behalf of:



Strategy & Population Health Officer
Hampshire Hospitals NHS Foundation Trust

- cc. [Redacted] Programme Director, Hampshire Hospitals NHS Foundation Trust
- [Redacted] MOHHS Programme Technical Lead, Hampshire Hospitals NHS Foundation Trust
- [Redacted] MoHHS Programme Manager – Land, Planning & Transport Strategy Team (HHFT)
- [Redacted] Director, Stride Treglown Limited
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