

LITTLETON & HARESTOCK PARISH COUNCIL (LHPC)

Response to the Winchester City Council Regulation 19 Local Plan 2020-2040 Consultation

Introduction

1. The Parish Council welcomes the opportunity to comment on the Regulation 19 Local Plan. This response sets out its formal submission to the consultation to be considered at the examination.

Littleton and Harestock Parish Council have indicated in the following paragraphs where we ‘Support’, or ‘Object’ to the various policies listed below. Where an objection has been made, a response to the additional questions and/or suggested wording changes as requested in the online consultation has been provided (see boxes highlighted in blue).

The Parish Council is extremely disappointed that there have been no substantive changes to the local plan in response to the comments it submitted at the Regulation 18 stage.

Policies

Strategic Policy SP1 Vision and Objectives

2. The policy sets out Winchester City Council’s (WCC) commitment to deliver its vision and objectives which includes engaging proactively with a range of partners. It provides the basis for working with organisations such as parish councils. The Parish Council welcomes the opportunity to contribute to the future planning of its area but any engagement must be such that the views of the local community are seen to be influencing decisions and not just a tick box exercise.

Object Policy SP1 by explicitly stating: “... engage proactively with a range of partners, including parish councils, to jointly find solutions... “

What modification(s) are necessary to make the policy legally compliant or sound?

Increase the range of partners listed in the policy to refer to Parish Councils.

What is your suggested wording or text for the policy:

Amend policy to read”... engage proactively with a range of partners, including parish councils, to jointly find solutions... “

Strategic Policy SP2 Spatial Strategy and Development Principles

3. The policy sets the overall strategy and principles for the development put forward in the Plan. It sets out seven criteria for new development to meet and refers to the Sir John Moore Barracks (SJMB) as a key site in the Winchester Town spatial area. The policy provides the strategic framework for more detailed policies.
4. Policy SP2 includes a housing requirement of 5,640 new homes for Winchester Town. The requirement is part of the district wide housing figure which includes an allowance for potential requests from adjoining authorities regarding their unmet need, non-delivery of allocated sites or shortcomings in other forms of supply. The calculation of the district-wide allowance of 1,900 is not clear or its impact on the Winchester Town housing requirement. The increase on the standard methodology figure has not been justified. The Parish Council is concerned that the figure for Winchester Town places unnecessary and unjustified pressure on the Sir John Moore Barracks site to accommodate more homes resulting in the loss of land of ecological importance.

Support Policy SP2 criteria iv-x

Object Policy SP2 criteria i) the housing requirement for 5,640 new homes has not been justified.

What modification(s) are necessary to make the policy legally compliant or sound?

Amend the housing figures for each housing strategy area by removing that element of the 1,900 buffer from each.

What is your suggested wording or text for the policy:

As above.

Strategic Policy SP3 Development in the Countryside

5. The policy seeks to restrict development to that which has a need to be located in the countryside. It is a key policy for managing development proposals outside of defined settlement boundaries. The Parish Council considers that the countryside is one of the district's most important assets and any development should be fully justified. The Parish Council supports the policy.

Support Policy SP3

Strategic Policy (CN): Carbon Neutrality and Designing for Low Carbon Infrastructure

6. The Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course, future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. The Parish Council supports these policies.

Support policies CN1-8 inclusive.

Strategic Policy D1 High Quality, Well Designed and Inclusive Places

7. The policy sets out the approach to design that WCC expects promoters of development to use to inform their proposals for development across the District. The Parish Council supports the policy.

Support Policy D1

Strategic Policy D2 design principles for Winchester Town

8. The policy sets out the approach to design that WCC expects promoters of development to use to inform their proposals. Criteria are set out which includes reference to community engagement, existing patterns of development, improving local connections, better environment for pedestrians and cyclists and the retaining and enhancing of existing green spaces and including more public spaces. The Parish Council considers that new development should make a positive contribution to the area in which it is located and be integrated with it. The Parish Council supports criteria i-viii of the policy.

Support Policy D2 i-viii

Strategic Policy D5 Masterplan

9. WCC are relying upon the preparation of masterplans with indicative layouts to provide the detailed planning framework to deliver the strategic allocations of the Plan. The intention of WCC is that the masterplans will be prepared by landowners and developers with input from it and following community engagement. However, as currently drafted, there is no specific requirement for the promoters of the strategic sites to engage with the local community which is a serious omission. A requirement to undertake effective engagement with the local community should be included in the policy and in paragraph 12.26 under Policy W2.
10. The reliance on landowners and developers to lead on the preparation of masterplans is of serious concern to the Parish Council as it hands control of preparing the planning framework to them. If that is WCC's preferred approach then the strategic policy and the specific site allocation policies should

include much more detail, particularly where there are land-use implications. As currently drafted Policy D5 does not provide a robust framework for the delivery of strategic sites nor does it provide the necessary clarity.

11. In respect of the impact on the parish of the redevelopment of the Sir John Moore Barracks (SJMB) the Parish Council is particularly concerned that the local plan does not provide the appropriate policy framework. Policy D5 effectively delegates decisions which should be resolved in the local plan, such as the delineation of areas where a particular policy applies e.g. the boundary of a countryside gap, to a non-statutory planning document. In the case of WCC, it is not even given the status of a supplementary planning document. This reliance on other documents to set planning policy is not in accordance with the relevant Regulations or case law.
12. The status of a masterplan is not at all clear. This is of major concern for the Parish Council. For large sites such as Sir John Moore Barracks (SJMB) it is reasonable to expect, at the very least, that the Plan should set out detailed requirements for the development of strategic sites. It is not good practice to rely upon other documents to set out the precise land-use implications of local plan policies. It also means that the local community when commenting on this local plan and future versions does not have a clear understanding of the implications of allocating the Sir John Moore Barracks (SJMB). Given the importance of the site and the scale of development proposed it should either be the subject of a detailed site allocation policy or be the subject of a separate site allocations development plan document. A more detailed masterplan could then be developed as supplementary guidance with all of them being subject to effective community engagement. The current approach leaves too many important decisions to an informal process which would be developer-led and would carry little weight in the decision-making process when an application was submitted. These concerns cannot be overstated. The Parish Council objects to the policy.
13. The Plan in paragraph 5.72 states that the masterplan could be prepared at the same time as the submission of development proposals. The Parish Council considers that the masterplan should be in place well before any application is submitted to ensure that it has led the planning process and informed detailed proposals.

Object to Policy D5 as it relies upon the preparation of non-statutory planning documents to deliver the policies of the local plan in respect of strategic land allocations

Object to Policy D5 as it relies upon landowners and developers to lead the process of preparing a masterplan. That role should be undertaken by WCC

Object to Policy D5. It should be redrafted to include a specific requirement that the preparation of a masterplan must include effective and inclusive engagement with the local community.

Object to Policy D5. Paragraph 5.72 should be amended to state that masterplans must be in place before development proposals are submitted.

What modification(s) are necessary to make the policy legally compliant or sound?

- a. Remove the reliance on the preparation of non-statutory planning documents to deliver the policies of the local plan in respect of strategic land allocations.
- b. Remove the reliance on landowners and developers to lead the process of preparing a masterplan. That role should be undertaken by WCC.

What is your suggested wording or text for the policy:

Amend the second paragraph of the policy to replace “which has involved and engaged with stakeholders and communities” with “which has been the subject of effective and inclusive engagement with stakeholders and communities”

Modify Paragraph 5.72 to state that masterplans must be in place before development proposals are submitted

Strategic Policy D6 Brownfield Development and making best use of land

14. The use of brownfield land to meet the needs of the district has the potential to make a greater contribution to reducing the carbon footprint of the district than greenfield sites. However, they can present a number of challenges to their re-use which requires clear guidance on how the local plan policies would be applied. The policy only refers to sites within settlements and makes no reference to sites in the countryside.
15. The policy seeks to optimise the development potential of brownfield sites and to deliver higher densities. It recognises that there will be other considerations such as the need to create high quality places. The supporting text, ref paragraph 5.73 does reference the character of the site and wider area but does not include other key factors such as landscape and biodiversity. The Parish Council objects to the policy.

Object to Policy D6. It does not extend to brownfield sites in the countryside. It should be amended to include other key considerations to the development of brownfield land such as landscape quality and biodiversity.

What modification(s) are necessary to make the policy legally compliant or sound?

Add consideration for brownfield sites in the countryside, and landscape quality and biodiversity.

What is your suggested wording or text for the policy:

- a. Amend the Policy, in the first paragraph delete the reference to existing settlements
- b. Amend the Policy in the last sentence of the first paragraph, after well designed places add...’ consistent with the other policies of the plan’
- c. Amend the Policy, in the second paragraph, after general character add ‘landscape quality and biodiversity’

Strategic Policy T2 Parking for New Developments

16. The policy sets out a new approach whereby rather than set standards for parking provision to be complied with and any reductions to be justified by the developer, WCC now propose that it is for developers to make the case for the number of spaces provided. The intention is to seek a reduction in parking provision in favour of more sustainable forms of transport.
17. The Parish Council is very concerned that this new approach will not deliver the outcomes intended by WCC. By setting standards for parking in a local plan all developers know what is required, should they choose to bring forward a site. The new policy could encourage developers to promote sites with lower parking provisions and to reflect that approach in any agreements with landowners. In those instances where WCC did not accept a lower standard, it would now be for it to justify its decision which would most likely generate more work for officers. It could also be more difficult to increase the number of parking spaces given the commercial decisions taken by the developer who may seek to minimise any cost implications at the expense of other policy requirements.
18. The implications of insufficient parking on a new development can have a significant impact on adjoining areas. The Parish Council is concerned that the approach is likely to create parking issues for existing and new residents. WCC is basing the approach on the availability of alternative means of travel particularly public transport, over which it has no control and consequently a serious weakness for the Plan. The Parish Council objects to the policy.

Object to Policy T2. The policy is likely to deliver schemes where the lack of parking becomes a serious design and social issue.

What modification(s) are necessary to make the policy legally compliant or sound?

Amend the Policy to include the required standard of parking for all types of development.

What is your suggested wording or text for the policy:

As above.

Policy T4 Access for New Developments

19. The policy sets out a requirement for new or changes to existing accesses to development to support non-car modes of transport and to provide safe and attractive routes to, from and within a site. How a site is integrated with the local environment in terms of transport is a key issue. The Parish Council supports the policy.

Support Policy T4

Policy NE1 Protecting and Enhancing Biodiversity and the Natural Environment in the District

20. The Plan recognises the importance of the natural environment and this policy sets out the framework for managing the impact of development on it. Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity. The Parish Council considers that the natural environment of the district is one which must be protected and opportunities taken to enhance it. It supports the policy.

Support Policy NE1

Policy NE4 Green and Blue Infrastructure

21. The Plan highlights the importance of green and blue infrastructure and identifies key assets including natural and semi-natural greenspaces such as chalk down lands. The Plan also identifies a deficit in informal greenspaces within the district. The policy provides the framework for seeking to improve the natural environment. These should include the use of verges and 'pocket parks' to create, for example, wildflower meadows so that mini green corridors can be established that also attract insects. The Parish Council supports the policy.

Support Policy NE4

Policy NE5 Biodiversity

22. The policy seeks to protect and enhance the biodiversity of the district and will permit development that achieves that. Any assessment of whether a development meets the requirements of the policy will require a full understanding of the biodiversity of a site and the potential to improve it. The Parish Council supports the policy.

Support Policy NE5

Policy NE7 Settlement Gaps

23. WCC consider settlement gaps as an important tool in identifying and protecting areas which could potentially be at risk of coalescence and help settlements maintain their separate identities. Development within areas identified as gaps must retain the open and undeveloped nature and ensure that settlements retain their identity. The Policy includes a gap between Winchester and Littleton.
24. The policy as drafted does not provide the same clear policy framework as that set out in Policy CP18 of the adopted Joint Core Strategy 2013. Policy NE7 wording only seeks to restrict development which does not undermine the function of the gap and its intended role. Policy CP18 is much clearer on the form of development which would not be acceptable: 'Within these areas only development that does not physically or visually diminish the gap will be allowed.'

The supporting text of para 9.43 goes further

- it would not diminish the physical and/or visual separation of settlements; and
- it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

The proposals map for the Sir John Moore Barracks includes the boundary of the settlement gap as currently defined in the adopted local plan. At the same time, it shows land within the gap proposed for

housing. Clearly the land cannot perform both the function of a settlement gap and be allocated for development at the same time.

25. The Parish Council is concerned that the boundary of the Winchester-Littleton settlement gap is not clearly defined in the Plan. Officers have advised both the Parish Council, and WCC councillors at formal meetings, that the boundary of the gap, as it would apply to the Sir John Moore Barracks would be determined through the masterplan process under Policy W2 after the extent of development had been determined. This is considered to be the wrong approach. The extent of the Winchester-Littleton Gap should have been assessed as part of the review of gaps commissioned by WCC and shown on the proposals map. The delineation of the boundary would then have informed the assessment of the capacity of the site in terms of scale of development. However, it was excluded from the review as the masterplan process would determine the extent of built development within the site which in turn would inform a future review of the gap, ref paragraph 1.8 of the Settlement Gap Review Topic Paper July 2024.

This approach is contrary to the approach set out in the PUSH Policy Framework for Gaps referred to in the Topic Paper, July 2024 which is that the designation of gaps is a tool for shaping the pattern of settlements rather than development determining where gaps should be defined, which is the WCC approach. It is vital that the designation of settlement gaps, given their importance in the overall spatial strategy, should be fully defined in the Plan and shown on the proposals map. It is not a matter to be delegated to a masterplan prepared by the landowner/developer which has no planning status.

Support Policy NE7 and the inclusion of a gap between Winchester and Littleton

Object to Policy NE7. The boundary of the Winchester-Littleton settlement gap should be identified on the proposals map of the Plan

Object to Policy NE7. The policy should be re-drafted as follows 'Development within settlement gaps would only be allowed if it

- **would not diminish the physical and/or visual separation of settlements; and**
- **would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.**

What modification(s) are necessary to make the policy legally compliant or sound?

Amend the proposals map to show the extent of the proposed Winchester-Littleton Settlement Gap.

What is your suggested wording or text for the policy:

The policy should be re-drafted as follows 'Development within settlement gaps would only be allowed if it

- would not diminish the physical and/or visual separation of settlements; and
- would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

Policy NE9 Landscape Character

26. The landscape of the district is very important to its character and function. The policy permits new development where it protects and enhances the district's distinctive landscape character. The Parish Council supports the policy.

Support Policy NE9

Policy NE14 Rural Character

27. The aim of the policy is to protect the countryside from unnecessary new development. Where new development is justified it should not harm the rural character of the area outside settlement boundaries. The Parish Council supports the policy.

Support Policy NE14

Strategic Policy HE1 Historic Environment

28. The heritage of an area, including in our Parish at Flowerdown, is an important part of its character. The proposed heritage policies of the local plan provide a robust framework and are supported by the Parish Council.

Support Strategic Policy HE1

Policy HE2 All Heritage Assets

Support Policy HE2

Policy HE3 Designated Heritage Assets

Support Policy HE3

Policy HE4 Non- Designated Heritage Assets

Support Policy HE4

Policy HE5 Mitigation and the Avoidance of loss of Heritage Assets

Support Policy HE5

Policy HE6 Scheduled Monuments and Nationally Important Non-Designated Assets

Support Policy HE6

Policy HE7 Non-Designated Archaeological Assets

Support Policy HE7

Policy HE10 Development in Conservation Area

Support Policy HE10

Policy He11 Demolition in Conservation Areas

Support Policy HE11

Policy H1 Housing Provision

29. WCC are proposing a figure of 15,465 which is in excess of the figure based on the Government's standard methodology and exceeds it by 1,900 homes. The justification for the extra homes is to cover the possibility of adjoining districts including in the area covered by the Partnership for South Hampshire (PFSH) not meeting their own requirements.

30. How the figure of 1,900 was arrived at is not clear and seems premature as WCC has not received formal requests to meet unmet needs from adjoining authorities. An increase of 14% in the housing required by the Government has not been justified. The larger figure creates unnecessary pressure to allocate land for housing and to maximise the number of dwellings on proposed sites such as the Sir John Moore Barracks (SJMB) site than would otherwise be appropriate given the site constraints.

31. The five-year housing land supply for the district is calculated on the annualised number of dwellings per year proposed in the local plan. WCC's approach of increasing its requirement has a significant impact on the five-year figure. This results in an annual requirement for 773 dwellings, which is in excess of the average rate of completions that WCC have experienced in the last 10 years. A failure to deliver the projected requirement would lead to a supply shortfall which would make areas in the parish vulnerable to planning by appeal. The Parish Council objects to the policy and considers that the local plan requirement for 15,465 is not justified and should be reviewed.

Object to Policy H1. The requirement for 15,465 dwellings has not been justified

Object to Policy H1. The addition of a buffer of 1,900 dwellings is not necessary and has not been justified.

What modification(s) are necessary to make the policy legally compliant or sound?

Remove the unmet needs allowance and amend the housing figure to read 13,565.

What is your suggested wording or text for the policy:

As above.

Policy H3 Spatial Housing Distribution

32. The area north of Winchester is proposed to accommodate approximately 2,400 new homes at King's Barton and Sir John Moore Barracks (SJMB), which amounts to 15% of the total Local Plan requirement and a park and ride site for 850 spaces. The Parish Council is concerned that the environmental impact of the scale of development proposed and that the in-combination effects of the development have not been fully assessed.
33. The figure of 5,640 will include an element of the 1,900 allowance figure which has not been justified. The Parish Council is concerned that the approach taken by WCC creates unnecessary pressure to release land for development around Winchester to meet the potential unmet need from authorities who are located in a different housing market area. In particular, there is unnecessary pressure on the Sir John Moore Barracks (SJMB) site to deliver more homes than would otherwise be appropriate given the site constraints.

Object to Policy H3. The impact of the allocation of the Sir John Moore Barracks (SJMB) for development should be assessed in the context of the wider area including the existing development at King's Barton.

Object to Policy H3 the number of dwellings, 5,640 is not justified

What modification(s) are necessary to make the policy legally compliant or sound?

Amend the policy by reducing the figure of 5,640 to take account of the removal of the 1,900 buffer figure.

What is your suggested wording or text for the policy:

As above.

Policy H4 Development within Settlements

34. The housing requirement for the Winchester Town is set out in the table within policy H3. Paragraph 9.27 identifies Sir John Moore Barracks (SJMB) as one of the key sites allocated to meet that requirement which is described as a previously developed site. The Parish Council is concerned that as written the Plan gives the impression that all of the site is previously developed land which is not the case. It objects to the wording of the supporting text.

Object to paragraph 9.27 and the reference to the Sir John Moore Barracks (SJMB) site being previously developed land.

What modification(s) are necessary to make the policy legally compliant or sound?

Amend paragraph 9.27 delete the reference to the Sir John Moore Barracks.

What is your suggested wording or text for the policy:

As above.

Policy W2 Sir John Moore Barracks

35. The policy proposes the SJMB site as a housing allocation. It sets out some broad requirements in terms of how it would want to see the site developed with the details to be included in a masterplan. The Parish Council has set out its objections to the masterplan approach under Policy D5. The Parish Council has a number of specific issues with Policy W2 and the approach taken by WCC.

36. The **first issue** is the lack of detail set out in the policy to guide the preparation of a masterplan. The number of homes is presented as a range of 750-1000 dwellings however a figure of 900 dwellings is assumed by WCC in its estimates of sources of supply (ref paragraph 12.15). This figure was arrived at in the Regulation 18 local plan before the northern fields were designated as a candidate SINC.
37. The assessment of the site as set out in the Development Strategy and Site Selection Proposed Submission Plan Topic Paper, July 2024 and Appendix 3, July 2024 which has informed the assumed capacity has not fairly reflected the site's characteristics. It describes the site as sitting in a shallow valley when clearly much of it is on higher ground i.e. the northern fields. The site is recorded as already being developed when that is not the case. It downplays the ecological value of the site and under-estimates the visual impact of development, there is no reference to the impact on settlement character and the proposed settlement gap. It appears that the appraisal has adopted a general approach to the appraisal of the site rather than understanding its particular characteristics, which had that been done would have provided a more informed assessment of the capacity of the site to accommodate development.
38. The Integrated Impact Assessment Report, July 2024, records an overall significant negative impact in respect of biodiversity arising from the proposed allocation and major negative impact in relation to locally designated wildlife sites based on the existing Flowerdown SINC. The loss of land within the candidate SINC would mean that a much larger area would be affected by development which would suggest that the overall impact should reflect the scale of loss of ecologically important land i.e. major negative impact.
39. The **second issue** is the graphic used to support the Policy W2 for the site. The whole of the site is shaded which gives the impression that all of it could be developed, but the supporting text to the policy states that not all of the site is proposed or suitable for development (ref paragraph 12.15). The existing Flowerdown SINC (ref paragraph 12.19), the Winchester-Littleton Settlement gap (ref paragraph 12.26), and the candidate SINC which includes the northern fields are not shown on the graphic despite being key constraints. The local plan proposes a settlement gap and it appears that the existing boundary is to be retained and reviewed in a future review. This is a very muddled approach and lacks the clarity required of a development plan document.
40. The site also includes land which is currently providing much-needed green space within the Littleton Gap, as well as offering the potential for access to wildlife and outdoor pursuits for residents in the adjacent areas, such as Harestock where residents have very little green space within easy reach. The relatively unspoilt nature of this green space is likely to mean that the land has potential for supporting a wide range of flora and fauna, the loss of which would have an adverse impact on biodiversity.
41. The **third issue** is the lack of clarity on the area which WCC considers would be required to deliver 900 homes. The Parish Council does not object to the redevelopment of the existing areas where there is built development but any additional areas should only be identified after a careful consideration of the site's constraints and policy requirements including the retention of a settlement gap and extent of the SINC.
42. The Parish Council considers that the existing constraints should be identified in the policy, shown on a detailed proposals map for the site and used to inform the capacity of the site in terms of numbers of homes.
- Policies D1 and D2 provide guidance on the matters to be taken into account in the design of schemes. It would be more informative if Policy W2 had been drafted using these policies as a framework for setting out detailed requirements to be addressed within the site masterplan.**
43. The **fourth issue** is the reliance on a masterplan prepared by the landowner/developer to provide the planning framework for an important strategic site. See the relevant response to Policy D5. The consultation undertaken by the DIO, the promoters of the site, in August/September 2024 has only reaffirmed the Parish Council's concerns regarding the masterplan approach and the lack of clear guidance in Policy W2. There is no reference to the candidate SINC, there is only a passing reference to the potential for a settlement gap covering part of the site. The overall approach appears to be driven by the delivery of the proposed local plan figure of 900 homes and a park and ride site rather than to assess

the key site constraints to inform the scale of development which would be acceptable given the policy requirements of the other policies of the local plan.

44. Having regard to the policies in the local plan the Parish Council considers that in its current form, Policy W2 is in conflict with Policies SP2, NE1, NE5, NE7, NE9 and NE14
45. Policy W2 WCC proposes a park and ride facility of approximately 850 spaces. The Parish Council have a number of issues with respect to this proposal.
46. It would be an extensive area of hard surfacing with associated infrastructure and lighting located in the countryside which would have a significant impact, on the landscape and drainage on a key approach to Winchester. The need for such a large facility has not been fully demonstrated by WCC. The existing park and ride sites are operating below their capacity. The projected demand for additional spaces is based on work which pre-dates the Covid 19 pandemic which is having a significant impact on working practices and the need to travel to work (ref The Winchester Movement Strategy Feasibility Study July 2020 drafted in the early months of 2020). The Winchester Movement Strategy Feasibility Studies Phase 2 summary Report, July 2021, is the most recent report on the park and ride proposals for the City. The long-term case for a site at the SJMB is re-affirmed despite the report stating that the likely demand scenarios on which the case is based are likely to be lower than the lower range of projected demand.
47. There is a lack of detail on how the park and ride scheme would be delivered and of its long-term viability. The Feasibility Studies Phase 2 estimated the cost of two schemes at the SJMB, one for 650 spaces at £6m and a second phase of a further 250 spaces at £2.3m. The consultants commissioned by WCC to consider the viability of the SJMB site, as at September 2022, have not made any provision for the cost of the park and ride in their calculations. There is no indication of how the proposal would be funded and therefore there must be doubt as to the deliverability of the scheme.
48. In terms of the number of spaces proposed in Policy W2 and the studies which have informed the allocation there is an inconsistency which should be addressed. If the studies looked at 650-900 why does the policy propose 850?

Object to Policy W2. The capacity of the site should be reviewed in the context of the ecological value of the site.

Object to Policy W2. There is a lack of detailed policy requirements to guide any future master planning process.

Object to Policy W2. The Winchester-Littleton Settlement Gap should be shown on a detailed site allocation plan.

Object to Policy W2 to the lack of an accurate graphic presentation of the existing site constraints and extent of previously developed land.

Object to Policy W2 and the supporting text which is inconsistent in terms of the description of the extent of previously developed land.

Object to Policy W2 and the reliance on a masterplan to provide the detailed planning framework for the site

Object to Policy W2 and the proposal for an 850 park and ride scheme, the need for which has not been demonstrated, is not funded and therefore its delivery is uncertain.

Object to Policy W2 in its current form it is in conflict with Policies SP2, NE1,NE5,NE7,NE9 and NE14

What modification(s) are necessary to make the policy legally compliant or sound?

- a. The capacity of the site should be reviewed in the context of the ecological value of the site.
- b. Include detailed policy requirements to guide any future master planning process.
- c. The Winchester-Littleton Settlement Gap should be shown on a detailed site allocation plan.
- d. Remove the reliance on a masterplan to provide the detailed planning framework for the site.

What is your suggested wording or text for the policy:

- a. Correct the supporting text which is inconsistent in terms of the description of the extent of previously developed land.
- b. Add an accurate graphic presentation of the existing site constraints and the extent of the previously developed land.
- c. Amend the Policy criteria xix delete reference to 850 spaces and insert new text...’ the precise number of spaces to be provided will be subject to a detailed assessment of the need for spaces’
- d. Amend the Policy to read 700 dwellings
- e. Amend the Proposals Map to show the settlement gap and the propose area for housing with no overlap
- f. Amend the Proposals Map to show the existing and candidate SINC site boundaries
- g. Amend the Policy to identify the key land-uses for the site.
- h. Revise the policy as in its current form it conflicts with Policies SP2, NE1, NE5,NE7, NE9 and NE14

Monitoring

49. The Local Plan is seen by WCC as a key document to deliver sustainable development and support its ambitions to achieve a carbon zero district. The Local Plan will be subject to regular reviews between now and 2040 and understanding both the effectiveness of the policies and how successful (or otherwise) they are, will inform those reviews. How the monitoring of policies will be undertaken is set out in a chapter at the end of the document. The focus appears to be limited to monitoring decisions of planning applications and appeals. The Parish Council considers that a more comprehensive approach to monitoring should be set out which would assess the outcomes and the effectiveness of the full range of the Plan’s policies and the decisions arising from them.

Presentation

50. The document is very long and would benefit from being edited to produce a more concise document, especially for ease of public accessibility. Additionally, many of the maps do not have a key which makes them difficult to understand.

Conclusion

We make our submission in good faith and trust that they will be considered in that way so that together we can safeguard and enhance the quality of our parish and the wider city given the many challenges that we face in the coming years.