YOUR PLACE YOUR PLAN.

Winchester District Local Plan

Statement Prepared under Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Winchester District Local Plan 2020 – 2040

Part 2 Regulation 19

November 2024





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Part 2 – Regulation 19

1. Introduction

- 1.1 The Regulation 19 representation period is the last stage of public engagement before submitting the draft plan to the Planning Inspectorate for examination. This is a formal process that requires comments on the soundness and legal compliance of the plan.
- 1.2 The Council notified each of the statutory consultees, organisations and bodies, Parish and Town Councils, and the general public and invited them to submit comments on the proposed submission Local Plan policies and site allocations. In accordance with the Statement of Community Involvement (January 2024).
- 1.3 This also includes general consultees that the Local Planning Authority is required under the regulations to notify about the public consultation, neighbouring Local Planning Authorities, and residents or persons carrying on business in the Local Planning Authority's area along with people that have signed up to receive email alerts about the Local Plan.
- 1.4 The Regulation 19 consultation for the proposed submission Winchester District Local Plan was held for 6.5 weeks between 29 August and 23:59 hours on 13 October 2024.

Summary of Engagement

1.5 The methods and processes utilised in bringing the Proposed Submission Local Plan (Regulation 19) to the attention of all of those that may wish to comment, are set out in the Consultation Report, in summary this included:

Drop-in Events

- 1,6 Three drop-in events at different locations across the district were held. These were staffed by officers from the Strategic Planning Team, with support from the Cabinet Member for Place and the Local Plan.
- 1.7 Their purpose was to explain the role of the Local Plan, this stage of the consultation and the consultation process. Officers from the Strategic planning team and the Cabinet Member for Place and the Local Plan were on hand to discuss the wording of any policies and any of the proposed development sites and to actively encourage people to respond to the public consultation.
- 1.8 Locations were selected to ensure the whole District was included i.e., Winchester Town, the North, and the South of the District, and specifically in areas which had new site allocations in the Local Plan.
- 1.9 The events took place at the following locations:

- Winchester Town The Nutshell Theatre (15:00-18:00, Wednesday 11 September 2024)
- Wickham Wickham Community Centre (15:30-19:30, Tuesday 17 September 2024)
- Sutton Scotney The Victoria Hall (15:30-19:30, Wednesday 25 September 2024)

In total, approximately 121 people attended.

1.10 The engagement strategy also included:

Paid advertisement on a variety of radio stations

- 26 different stations were reached through this mechanism using postcode data to specifically target those people listening within the Winchester District.
- Winchester Radio also advertised the Regulation 19 Local Plan consultation. The advert was broadcasted 8 times per day, every 2 hours (with one exception), between 6:00-23:00, every day of the week for the full consultation period.

Newspaper advertising

- A formal statutory notice was placed in the Hampshire Chronicle and the Mid Hants Observer on the 29th and 30th August, respectively.
- Half-page advertisements were posted at the beginning and middle of the 6-week consultation period in three newspapers: The Hampshire Chronicle, Mid Hants Observer and Portsmouth News

Posters

- o In total, 385 posters were printed and sent across the district.
- Posters were on display at locations of interest, such as community centres, places of worship, gyms and leisure centres, colleges and universities, libraries, parish council notice boards, car parks, hospitals, health facilities and around Winchester City Council's properties.
- Digital posters were also provided to numerous societal groups and organisations.

Social Media

- Paid marketing through Facebook and Instagram, and advertising through a variety of other social media platforms, including X, LinkedIn and Next Door.
- Posts advertised the consultation, drop-in events, and specific topics relevant to the consultation.

Local press / website /other

- A media briefing note was published on the Winchester City Council website on 29 August 2024.
- A banner was placed under the signature of staff emails to advertise the consultation both internally and externally.

- Microsoft teams background for WCC staff also referred to the consultation.
- 1.11 Hard copies of the local plan were available to view at :
 - Alresford Library
 - Bishops Waltham Library
 - Chandler's Ford library
 - Eastleigh Library
 - Havant Library
 - Hedge End Library
 - Martial Rose/West Downs (University of Winchester) Library
 - Waterlooville Library
 - Winchester Library

2. Consultation Responses

- 2.1 In total, the Council received 473 representations from statutory and general consultees, in addition to individuals, businesses and organisations across the Winchester District. All responses can be viewed in full on the Local Plan
 Examination web page, which also includes a searchable database to look up specific representations.
- 2.2 The majority of comments (351) were submitted through the Council's online consultation portal Citizenspace¹, with some responses also being sent by email and letter (122).

Overview of Representations

2.3 Respondents were asked if they wished to be kept up to date on the developments to the Local Plan:

Option	Total	Percent
Yes I would like to be kept up to date with Local Plan developments	400	84.75%
No	53	11.23%
Not Answered	19	4.03%

- 2.4 As part of each section of the Local Plan, respondents were also asked if they wished to participate in the examination hearing sessions if asked to do so. Whilst many respondents did not answer this question, the majority that did answered yes.
- 2.5 In addition to representations on the Plan's policies and site allocations, comments were also received on the following evidence base documents (no of representations in brackets):
 - Integrated Impact Assessment (31)
 - Habitats Regulations Assessment (2)
 - Policies Map (6)
 - Evidence Base documents:
 - Settlement Hierarchy Review (8)
 - Development Strategy and Site Selection (9)
 - Strategic Transport Assessment (7)
 - Strategic Housing and Economic Land Availability Assessment (4)
 - Duty to Cooperate Statement of Compliance (3)
 - Viability Assessment (3)
 - Statement of Community Involvement (2)
 - Settlement Gap Review (5)

¹ To aid assessment and processing of the representations, all those received via email and letter were subsequently transferred to Citizenspace.

3. Summary of Representations and Identification of Key Issues

3.1 The following schedules (as per the template below) provide an overview to both the number of representations per policy, together with an overall summary of comments made and key issues arising. Representation numbers are listed, and statutory consultees are named (in bold). The schedules include data on whether policies are legally compliant, sound and comply with the duty to cooperate.

Use of Al

- 3.2 As this is the submission stage, the city council is required by the Town & Country Planning Regulations (2012) to produce a summary of the main issues arising from the public consultation. In order to make efficient use of resources, a closed AI system was used in November 2024. The software generated an initial summary of the representations and provided a list of the representation numbers.
- 3.3 This initial output was then checked by Officers who were leading on the topics and the summaries of representations were amended/supplemented by Officers in the Strategic Planning Team and used as the basis to create a proforma per policy. Officers added a list of the main issues arising from the representations and listed actions since the close of the Regulation 19 consultation. The use of this software has been used responsibly and lawfully. Appropriate permissions to disclose and share any personal information and its use complies with data protection and copyright legislation.

Local Plan Reference			
or document			
Total Number of Repres	entations received		
Number of respondents	who confirmed they	Yes	No
consider the policy is -			
Legally Compliant			
Sound			
Complies with Duty to C	ooperate		
Summary of Representa	tions		
Representation Number	s (Statutory consultees in bold a	and named)	
Post Regulation 19 Action	ons		
_			
Main issues raised in re	presentations received in reg	ulation 19 con	sultation
	_		

Duty to Cooperate.

- 3.4 A key element of the local plan examination process is to determine whether there has been compliance with the Duty to Cooperate as set out in planning legislation and guidance. It places a legal duty on Local Planning Authorities, County Councils and prescribed public bodies to engage constructively, actively, and on an ongoing basis to maximise the effectiveness of a local plan in the context of strategic cross boundary matters.
- 3.5 The Council has prepared a <u>Duty to Co-operate- Statement of Compliance</u> (September 2024), which sets out all communication and processes with the prescribed bodies and whether <u>Statements of Common Ground</u> have been agreed and Signed. Two Statements of Common (Havant Borough Council and Portsmouth City Council) were updated following the public consultation on the Regulation 19 Local Plan.
- 3.6 The following summarises representations at the Regulation 19 stage from those bodies prescribed for the purposes of section 33a(1)(c) of the Act and as set out under Regulation 4 of the Town and Country Planning England (Local Planning) (England) Regulations 2012.

Section 33a, lists the following:

- a) a local planning authority,
- (b) a county council in England that is not a local planning authority, or
- (c) a body, or other person, that is prescribed or of a prescribed description,

Regulation 4 includes:-

- (a)the Environment Agency;
- (b)the Historic Buildings and Monuments Commission for England (known as English Heritage);
- (c)Natural England;
- (d)the Mayor of London;
- (e)the Civil Aviation Authority;
- (f)the Homes and Communities Agency;
- (g)each integrated care board established under Chapter A3 of Part 2 of the National Health Service Act 2006:
- (ga) NHS England
- (h)the Office of Rail and Road
- (i)Transport for London;

(j)each Integrated Transport Authority

(k)each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority); and

(I)the Marine Management Organisation.

Organisation	Comment made	WCC Response
NHS Hampshire and Isle of Wight ICB	Throughout the 'Development Allocations Winchester' chapters (page 306 onwards) the Plan includes the narrative highlighting the shortfalls in primary care capacity and the need for developers to liaise with the NHS to establish potential S106 requests. See separate list for comment on each housing allocation policy.	The council has made a number of proposed modifications to the local plan in response to the comments from the ICB.
Environment Agency	Paragraph 12.10 should also reference discussion with the Lead Local Flood Authority (LLFA) alongside the Environment Agency. The LLFA are responsible for managing flood risk from groundwater as per the Flood and Water Management Act 2010 There should be a minor addition to the policy (SP2/SP3) ("not increase flood risk") as shown below: "unacceptable harm to biodiversity and the water environment, not increase flood risk" It is important to highlight the importance of flood risk management for any development to accord with fundamental principles within the National Planning Policy Framework (paragraph 165). Other detailed comments on various allocation policies.	The council has made a number of proposed modifications to the local plan in response to the comments from the Environment Agency.
South Downs National Park	Detailed comments on references to SDNP and its setting throughout the plan.	See agreed Statement of Common Ground August 2024 and proposed modifications in response to matters raised by SDNP.
Natural England	Various detailed comments to both policies and supporting text and the HRA.	The council has made a number of

Organisation	Comment made	WCC Response
		proposed modifications to the local plan in response to the comments from Natural England. There is also a signed and agreed Statement of Common Ground and the council has undertaken further work on air quality in direct response to comments on the HRA. An updated Statement of Common Ground is currently in the process of being drafted.
Historic England	Various detailed comments to policies and supporting text.	The council has made a number of proposed modifications to the local plan in response to the comments from Historic England.
New Forest District Council	Nutrient Neutrality (draft Policy NE16) NFDC supports the inclusion of proposed Policy NE16 which sets out to ensure that development proposals demonstrate that they secure nutrient neutrality to avoid having an adverse impact on the integrity of internationally important habitats.	Noted.
Eastleigh Borough Council	Eastleigh Borough Council agreed a Statement of Common Ground with Winchester City Council in September 2024. Eastleigh Borough Council has no further comments it wishes to make on the reg. 19 Winchester Local Plan	Agreed and signed Statement of Common Ground.
East Hampshire District Council	East Hampshire District Council is content that as there is an up to date Statement of Common Ground in place, there is no need to give a detailed response to this consultation. There are no areas of disagreement that would lead us to answer no to any of the above questions.	Agreed and signed Statement of Common Ground

Organisation	Comment made	WCC Response
Basingstoke and Deane Borough Council	Gypsy and Traveller pitch provision is a cross-boundary issue which we continue to discuss through our relevant meetings, We have considered the helpful Gypsy and Traveller Topic Paper (GTTP) that has now been published to accompany the Regulation 19 Local Plan and note that the Council considers that it has explored all avenues to meet the identified need. It is a general concern that Winchester is unable to meet its gypsy and traveller need in full. We are in a similar position, trying to accommodate need with limited opportunities and given this, and as previously indicated, the council unfortunately remains in a position where it is unable to assist neighbouring authorities with accommodating unmet need. We note that, as outlined in your GTTP, the need for pitches arises mostly in the south of the district. However, due to the lack of opportunities to allocate sites and issues with demonstrating need, the Council ponders whether it is possible to allocate pitches elsewhere in the borough, as part of larger allocations to the north rather than not meeting the overall need. The GTTP, seems to indicate that because of need being focused in the south of the district, a policy hasn't been included that requires the provision of traveller pitches on housing allocations but it is questioned whether this approach leaves possible opportunities not fully explored? We would be happy to discuss this issue further as you move to examination.	Agreed and signed Statement of Common Ground
Hampshire County Council	Various comments on different allocations in relation to transport and school places. Welcome preparation of the Health Topic Paper and Health Impact Assessment. Have concern that Policy E6, E8 is not sound on the basis that there is limited evidence that a requirement for a 12-month marketing exercise is justified and effective in retaining employment opportunities – request modifications to refer to 6 months.	The council has made a number of proposed modifications to the local plan in response to the comments from Hampshire County Council.
	Policy T1- request edit inclusion of reference to 'the principles' as well as the 'concept' of '20-minute neighbourhoods' and inclusion of	

Organisation	Comment made	WCC Response
	reference to new developments being required to support or contribute towards the delivery of the LCWIP network across the district, and other transport schemes included within the Infrastructure Funding Statement, where appropriate. Policy T2/T3 - clarifying the policy position regarding what residential parking standards the City Council will expect applicants to consider	
	Policy NE1 – update to be consistent with Biodiversity Gain Hierarchy Policy NE3 - support the policy, but request the final sentence is expanded "or the benefit of the development to the community outweighs the harm caused by the loss of the facility" Policy NE10 – as currently worded is not consistent with national policy. Policy SH3 - supportive of the Whiteley Green allocation and has comments to ensure the policy and supporting text reflects the current information available from the landowner. Replace references to LT3 with LTP4 throughout the plan.	
Faraham	Various detailed comments on site allocations.	The council has
Fareham Borough Council	Fareham BC acknowledge and welcome Winchester City Council's commitment to cooperate with FBC in achieving the strategic development of Welborne and recognise the value of ensuring separation between the Welborne strategic development and the existing settlements of Knowle and Wickham in order to retain the open nature of the landscape.	The council has made proposed modifications to the local plan in response to the comments from Fareham. Agreed and Signed Statement of
	Statement of Common Ground and the Duty to Cooperate As set out in the August 2024 Statement of Common Ground made between Fareham Borough Council and Winchester City Council, Fareham Borough Council welcomes Winchester City Council's intention to meet their own housing need within the district and also supports the contribution being made towards accommodating the unmet need within the wider Partnership for South Hampshire	Comon Ground

Organisation	Comment made	WCC Response
	(PfSH) area. The councils have made a	
	commitment to continue to work together to	
	address strategic and cross boundary matters.	
Network Rail	Comment on design policies - Network Rail	Noted
	believes that Policy to be sound and is	
	supportive of maximising densities on	
-	brownfield sites close to public transport.	
Test Valley	We share a boundary with Winchester District	Agreed and Signed
Borough Council	to the east of our Borough and have	Statement of
Couricii	cooperated on cross boundary matters during	common Ground
	plan preparation. We have issued a joint Statement of Common Ground.	
	TVBC also welcomes the strategic emphasis in	
	the Plan on seeking carbon neutrality and	
	adapting for future climate change over the	
	plan period and beyond. We welcome the	
	value placed on the rural landscapes and on	
	sustaining and enhancing green and blue	
	infrastructure corridors and provisions (through	
	Policy NE4).	
National	Welcome aim of policy T1 and support the	Agreed and Signed
Highways	approach expressed in policy T2.	Statement of
		Common Ground
	Have reviewed the various housing policies	
	H1-H18 and housing allocation policies and	
	note that there are none which are directly	
	adjacent to the SRN. Have reviewed policies	
	E1-E11 and employment allocation policies, -	
	note that there are no 'new' employment sites that will likely directly impact the SRN. The	
	Winnall allocation is adjacent to both M3 J9	
	and the A34, however this is an existing site	
	and the policy is for it to remain.	
	In terms of the transport evidence it is noted	
	that there is still some uncertainty regarding	
	the proposed mitigation package to support the	
	Bushfeld proposals. The Infrastructure Delivery	
	Plan (IDP) document relies on the M3 J9	
	upgrade being completed. Whilst this is	
	committed and construction is underway, there	
	is not currently a fixed date for completion.	
	Completion is expected to be within the third	
	road period (2025-2030). The agreed	
	mitigation package for Bushfield may	
	necessitate future updates to the IDP.	
Homes	Homes England compart policy Delicy IAM	The council has
Homes	Homes England support policy Policy KN1	The council has
England	(Previously known as WK4) which allocates	made proposed modifications to the
	the site for 200 homes alongside significant	modifications to the

Organisation	Comment made	WCC Response
	community benefits including large areas of new public amenity space at the Meon Water Meadows and Knowle Triangle – various minor changes are requested to the details of the policy.	local plan in response to the comments from Homes England.
Marine Management Organisation	Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required.	Noted No further response received.
Hampshire Hospitals NHS Foundation Trust	Supports the objective to achieve carbon neutrality by 2030. Specific comments on CN2 – 3 and the need to reflect that materials proposed that do not necessarily align with traditional aesthetic aspirations and that achievement of BREEAM excellent may not be possible where overriding healthcare demands dictate outcomes, and there may be instances where on-site energy generation is not sufficient to meet needs. Policy CN6 the Trust support a move to Ground Source, Air Source and Solar, but object to the policy as written. Support policies D1, T1, T3, T4, NE1, NE3, NE5, HE1, HE2, HE8, HE9, HE14, E3, E4. Policy W11 - welcome the inclusion of a policy specifically covering Royal Hampshire County Hospital, but object 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. Suggest 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.	Noted
Havant Borough Council	Both authorities have discussed the proposed Reg 19 Local Plan and critically have agreed a framework amendments through an updated Statement of Common Ground. Havant Borough Council would highlight to the Inspector that significant discussion and progress has been made since the publication of the Winchester District Local Plan. On the	Agreed and signed an updated Statement of Common Ground since the Regulation 19 Local Plan was published for public consultation.

Organisation	Comment made	WCC Response
<u> </u>	basis that the framework of amendments	
	agreed between the authorities described in	The council has
	this representation and our statement of	made proposed
	common ground are enacted in the plan, the	modifications to the
	Borough Council would fully support the	local plan in
	soundness and legal compliance of the plan.	response to the
		comments in
	Paragraph 9.13 would be more accurate if it	relation to unmet
	referenced that the local plan should provide	housing needs.
	for objectively assessed needs for housing, as	
	well as any needs that cannot be met within	
	neighbouring areas, in accordance with para	
	11 of the NPPF.	
	Havant Borough Council considers that in	
	order for the Winchester District Local Plan to	
	be clear, unambiguous and fully meet the	
	'positively prepared' and 'effective' tests of	
	soundness, it is necessary for the plan to	
	explicitly set out how the unmet needs	
	allowance is to be apportioned between	
	neighbouring local planning authorities and/or	
	those within the housing market area:	
	It has been agreed that based on the current	
	unmet need allowance for housing in the	
	Regulation 19 Local Plan (Table H2), which	
	has not yet been tested at the Local Plan	
	examination, to reflect the total unmet need in	
	the housing market area would necessitate the following:	
	- To Portsmouth City Council: 30%	
	apportionment of the unmet need housing	
	allowance in the Winchester District Local	
	Plan To Havant Borough Council: 70%	
	apportionment of the unmet need housing	
	allowance in the Winchester District Local Plan	
Portsmouth	Request more details as to where Policy D3	Agreed and signed
City Council	applies to in the context of the existing built-up	an updated
	areas of South Hampshire.	Statement of
		Common Ground.
	PCC support Policy HE6 of the emerging Local	since the Regulation
	Plan setting out the evidence required as part	19 Local Plan was
	of an application that has the potential to	published for public
	impact a scheduled monument. We look	consultation.
	forward to working with WCC on the protection	The council has
	of Portsdown Hill and its important character and features.	The council has
	anu iealuies.	made proposed modifications to the
		local plan in

Organisation	Comment made	WCC Response
	PCC supports the position set out in Policy NE5 of the emerging Winchester Local Plan, which outlines the efforts to maintain, protect and enhance biodiversity within the District, working in partnership with neighboring authorities.	response to the comments in relation to unmet housing needs.
	Support the inclusion of Policy NE16 addressing Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent.	
	The City Council request that Winchester City Council earmarks a meaningful portion of its housing buffer towards meeting unmet need of the City of Portsmouth. The City Council has been holding bilateral DtC discussions with Havant Borough Council who are in the same position as Portsmouth City Council in requesting help from Winchester District in respect of unmet housing need.	
	The two authorities (PCC / HBC) suggest an apportionment of the 1,900-dwelling buffer (on the understanding that no other LPA has asked WCC to meeting their unmet needs, and accepting that the figures that make up the buffer are likely to change as the WCC Local Plan progresses) as follows: • To Portsmouth City Council: 30% apportionment of the residual unmet need housing allowance in the Winchester District Local Plan. This would represent 570 homes in the plan as submitted. • To Havant Borough Council: 70% apportionment of the residual unmet need housing allowance in the Winchester District Local Plan. This would represent 1,330 homes in the plan as submitted.	

3.7 In addition to comments about the Duty to Co-operate by the prescribed bodies a number of other statutory organisations, individuals and developer interests have also commented. The table below lists the statutory and general organisations that have responded to the question 'Complies with the Duty to Co-operate?' and have said, 'yes', 'no' or 'not answered', with regard

to the policies and site allocations they have commented on under Regulation 19.

Replied 'Yes' to Dtc	Replied 'No' to DtC	Did not answer
ANON-AQTS-32CD-5 -	ANON-AQTS-3BFT-8 -	ANON-AQTS-3BEW-A -
Colden Common Parish	Crawley Parish Council,	Littleton and Harestock
Council, ANON-AQTS-	ANON-AQTS-327U-A -	Parish Council, BHLF-
327U-A - Southern Water,	Southern Water, ANON-	AQTS-32YM-4 - Defence
ANON-AQTS-3B44-P -	AQTS-32CD-5 - Colden	Infrastructure
Otterbourne Parish	Common Parish Council,	Organisation, BHLF-
Council, ANON-AQTS-	ANON-AQTS-3B55-R -	AQTS-326U-9 - Active
32FT-R - New Alresford	South Wonston Parish	Travel England, BHLF-
Town Council,	Council, ANON-AQTS-	AQTS-32YX-F - Overton
ANON-AQTS-3BEW-A -	32N7-3 - Twyford Parish	Parish Council, BHLF-
Littleton and Harestock	Council, BHLF-AQTS-	AQTS-32EU-R - Hursley
Parish Council,	32E8-U - Otterbourne	Parish Council, BHLF-
ANON-AQTS-32SB-K -	Parish Council, ANON-	AQTS-326W-B - National
Defence Infrastructure	AQTS-32NN-T -	Gas Transmission,
Organisation, BHLF-	Swanmore Parish	ANON-AQTS-3BP6-M -
AQTS-32EU-R - Hursley	Council,	Wonston Parish Council
Parish Council, ANON-		ANON-AQTS-32CD-5 -
AQTS-3BFT-8 - Crawley Parish Council, ANON-		Colden Common Parish Council, BHLF-AQTS-
AQTS-3BQ4-K - Bishop's		328Z-G - Durley Parish
Waltham Parish Council,		Council, ANON-AQTS-
ANON-AQTS-322X-8 -		32N7-3 - Twyford Parish
Upham Parish Council,		Council,
ANON-AQTS-32N8-4 -		Gourien,
Badger Farm Parish		
Council, BHLF-AQTS-		
3281-7 - Wickham and		
Knowle Parish Council,		
ANON-AQTS-3BTZ-V -		
Bisho ANON-AQTS-		
32N7-3 - Twyford Parish		
Council p's Sutton Parish		
Council, ANON-AQTS-		
3B44-P - Otterbourne		
Parish Council		

3.8 The Council also published at Regulation 19, a <u>Statement of Compliance</u> to demonstrate how it had complied with the Duty to Co-operate, a small number of representations were received to that specific document:

Local Plan Reference or document	Duty to Cooperate – S	Statement of Compliance
Total Number of Represe	entations received	3

Summary of Representations

Representations refer to the Council not fulfilling its needs under the Duty to Cooperate in relation to housing across south Hampshire.

There is reference to the Housing Topic Paper and appendices which deal with requests under the Duty from Havant and Portsmouth Councils for Winchester to assist in meeting their housing needs. There is reference to the Local Plan has not been prepared on the basis of testing to meet any unmet housing needs. The IIA 2022 and 2024 did not undertake any testing of reasonable alternatives in excess of 15,620 homes.

Comments also refer to the Council not actively or constructively engaging in exploring the options for linking the proposal for a new community at Popham Airfield for 3,000 homes to a new settlement around Micheldever Station given the obvious benefits to the Basingstoke proposal if it had access to the wider infrastructure provision inherent in a larger-scale new community, including a dedicated route to improved services at the railway station.

National Highways requests a Statement of Common Ground is prepared to cover matters in relation to proposed development and the strategic road network in particular the M3 and A34.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3299-G/19/Duty to Cooperate - Statement of Compliance,
ANON-AQTS-32TE-Q/6/Duty to Cooperate - Statement of Compliance, BHLF-AQTS-32QF-N - National Highways/6/Duty to Cooperate - Statement of Compliance

Post Regulation 19 Actions

Statements of Common Ground have been signed and agreed (October 2024) with both <u>Portsmouth</u> and <u>Havant</u> Councils to set out an agreed position in terms of housing.

WCC has confirmed that the unmet need allowance of about 1,900 dwellings set within the Proposed Submission Local Plan (Regulation 19) can contribute to meeting the needs of Portsmouth City Council and Havant Borough Council.

It has been agreed that an apportionment of the current unmet need allowance in the Proposed-Submission Winchester Local Plan to Portsmouth and Havant as follows

• To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan.

• To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan.

There is also an agreed and signed <u>Statement of Common Ground</u> (October 2024) with National Highways in relation to the Strategic Transport Assessment and the proposed allocation at Bushfield Camp (Policy W5) and the need for ongoing liaison with Hampshire County Council.

Main issues raised in representations received in regulation 19 consultation

• Whether the Duty to Cooperate has been met.

Integrated Impact Assessment and Habitats Regulations Assessment

3.9 The Local Plan has also been informed at each stage of the Plan-making process by the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). The SA is an integral part of the process as required by legislation, this is under the umbrella of the Integrated Impact Assessment (IIA). It assesses the significant social, environmental and economic effects of the plan to ensure that decisions are made that contribute to achieving sustainable development. The SA assessed individual sites, proposed policies and different delivery options to address the overall housing need. The HRA identifies whether the plan is likely to have a significant effect on European protected sites and demonstrates that where significant impacts have been identified on nature conservation these will be avoided or mitigated. An Equalities Impact Assessment (EqIA) and a Health Impact Assessment has been undertaken, alongside the Sustainability Appraisal and Habitats Regulation Assessment.

Integrated Impact Assessment

Local Plan Reference or document	Integ	rated Impact Assessment
Total Number of Represe	ntations received	31

Summary of Representations

The majority of the representations that refer to the Integrated Impact Assessment (IIA) relate to the application of the IIA in the site selection process, with particular reference to the application of environmental and infrastructure evaluations, which it is claimed has led to the allocation of inappropriate sites.

Many representations highlight 'error's in the IIA and disagree with the findings and that of other evidence e.g settlement hierarchy, development strategy and site selection paper, so are challenging the allocation of specific sites in specific settlements e.g South Wonston, Waltham Chase.

Some representations are using the IIA to promote their sites for further consideration on the basis that these 'score' better than the allocated sites.

Some representations state that the IIA does not meet the legal or policy requirements for a sustainability appraisal and strategic environmental assessment so is fundamentally flawed, with a particular focus on its failure to test reasonable alternatives in the context of achieving sustainable development.

There is also criticism as to why higher growth options were not assessed. Whilst some do not disagree with the methodology of the IIA, there is reference to housing need, including those waiting on the Winchester Housing Register which concludes that Winchester has failed to plan for sufficient housing for its current and future communities. Therefore, the plan fails to satisfy the IIA objectives identified, in particular IIA objective 6 'Housing to a decent standard', and there is concern as to whether the plan therefore achieves sustainable development.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3B9Z-1/5/Integrated Impact Assessment, ANON-AQTS-3B83-S/2/Integrated Impact Assessment, ANON-AQTS-327R-7/1/Integrated Impact Assessment, ANON-AQTS-3291-8/11/Integrated Impact Assessment, ANON-AQTS-3B5A-4/10/Integrated Impact Assessment, ANON-AQTS-32GC-8/15/Integrated Impact Assessment, ANON-AQTS-329R-9/6/Integrated Impact Assessment, ANON-AQTS-32NS-Y/13/Integrated Impact Assessment, ANON-AQTS-329U-C/5/Integrated Impact Assessment, ANON-AQTS-3BP6-M -Wonston Parish Council/2/Integrated Impact Assessment, ANON-AQTS-329Q-8/40/Integrated Impact Assessment, ANON-AQTS-32UU-8/11/Integrated Impact Assessment, ANON-AQTS-32G7-V/19/Integrated Impact Assessment, ANON-AQTS-32SJ-U/12/Integrated Impact Assessment, ANON-AQTS-32TT-6/4/Integrated Impact Assessment, ANON-AQTS-3BQA-Z/22/Integrated Impact Assessment, ANON-AQTS-32TA-K/4/Integrated Impact Assessment, ANON-AQTS-3BPV-M/4/Integrated Impact Assessment, ANON-AQTS-32TE-Q/4/Integrated Impact Assessment, ANON-AQTS-32DS-N/2/Integrated Impact Assessment, ANON-AQTS-32F2-P/9/Integrated Impact Assessment, ANON-AQTS-32F5-S/1/Integrated Impact Assessment, ANON-AQTS-32ZS-B/8/Integrated Impact Assessment, ANON-AQTS-32ZM-5/5/Integrated Impact Assessment, BHLF-AQTS-328Y-F/14/Integrated Impact Assessment, BHLF-AQTS-328D-T/4/Integrated Impact Assessment, BHLF-AQTS-3287-D/2/Integrated Impact Assessment, BHLF-AQTS-328W-D/7/Integrated Impact Assessment, BHLF-AQTS-328X-E/22/Integrated Impact Assessment, BHLF-AQTS-32QY-8/14/Integrated Impact Assessment, BHLF-AQTS-32QZ-9/7/Integrated Impact Assessment

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

- Lack of consideration of alternative quantum of development to meet housing needs;
- All reasonable alternatives have not been assessed; and

 Criticism of scores allocated through the IIA methodology in terms of not allocating sites promoted for consideration/ disagreement of scores given to allocated sites in the IIA.

Habitats Regulation Assessment

Local Plan Reference or document	Habitats	Regulations Assessment
Total Number of Represe	entations received	2

Summary of Representations

The primary issues revolve around nutrient impacts on protected sites and the uncertainty of mitigation strategies proposed to address them by sites that lie outside the Winchester District. There is concern that developments within other authorities would also be seeking to use these resources. Therefore the data in the Nutrients Topic Paper is likely to be misleading as it refers to "the total number of kilograms of total nitrogen per year (Kg/TN/yr) available for use by development in Winchester", this does not reflect that this allowance is also available for use by development in other local authorities.

There is a lack of evidence to demonstrate that the mitigation forecast in Figures 2 and 3 of the Topic Paper is deliverable. Thus, on the Council's own HRA, it is clear that there is not the requisite degree of certainty that the proposed mitigation measures will be effective to avoid harm to the integrity of the protected sites. On this basis, the HRA does not (and cannot) conclude that there will be no adverse effects on the integrity of relevant Habitats Sites.

Natural England also raise matters in relation to nutrient impacts as it is Natural England's view that there is a likely significant effect on internationally designated sites in the River Itchen and Solent catchments due to an increase in wastewater from new housing - The Plan HRA is supported by a Nutrient Topic Paper setting out the plan level budget and expected mitigation requirements across the plan period. Paragraph 5.66 relies upon policy NE16 requiring allocations and windfall development to assess nutrient impacts and provide mitigation at project level. This conclusion is not correct and would not meet the tests of the Habitats Regulations. Natural England has advised the Council that the plan must produce a nutrient budget and expected mitigation across the plan period, this work has been set out in the supporting Nutrient Topic paper. Natural England have worked with the Council on agreeing the nutrient topic paper, we will continue to engage on strategic nutrient mitigation schemes as they come forward.

Natural England advise that the Local Plan does not currently pass the tests of soundness described in Paragraph 35 of the National Planning Policy Framework (NPPF), on the basis that the Plan should address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where there are impacts on European sites and SSSIs. Natural England is concerned regarding potential air quality impacts from the Bushfield Camp allocation (Policy W5), the air quality assessment provided does not assess potential impacts to ecological receptors and does not follow the methodology set out in the NE001 Air Quality Assessment guidance published by

Natural England. Therefore, Natural England cannot agree with the conclusion of the HRA (dated July 2024) prepared for the Reg 19 Plan, that there will be no adverse effect on integrity of the River Itchen SAC as a result of air quality.

Physical loss of habitats is also raised as an issue with reference to functionally linked land and Solent Wader and Brent Goose Strategy (SWBGS) sites. Paragraph 5.14 of the Appropriate Assessment infers that only those sites identified as Core areas in the SWBGS require and HRA, this is incorrect all levels of classification will require an HRA where direct or indirect impacts from development are identified as these sites are supporting habitats for the qualifying features of the SPA regardless of classification level.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-32TE-Q/5/Habitats Regulations Assessment, BHLF-AQTS-3282-8 Natural England/16/Habitats Regulations Assessment

Post Regulation 19 Actions

Discussions have been held between the Council and Natural England to resolve the matters raised. Further work on air quality has been undertaken – there is an agreed Statement of Common Ground dated September 2024.

An Air Quality Assessment has been undertaken to address Natural England's comment regarding air quality issues relating to Bushfield Camp and this is available on the Local Plan website.

An updated SoCG is currently being agreed with Natural England.

The Nutrients Topic Paper has been updated and is available on the Local Plan website.

Main issues raised in representations received in regulation 19 consultation

- Compliance with Habitat Regulations in relation to nutrients, habitat loss and air quality.
- 3.10 The remainder of this document sets out the representation summaries and main issues arising from the representations, on a chapter by chapter basis as per the order of the local plan.

Introduction

Local Plan Reference or document		Policy SP1 Vision and Objectives
Total Number of Represe	ntations received	45

Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	24	12
Sound	14	27
Complies with Duty to Cooperate	22	14

Summary of Representations

Housing provision and affordability were significant concerns, accounting for 40% of feedback, demanding a robust policy to address housing affordability and meet unmet needs effectively. Community inclusion issues are raised by 29%, indicating barriers to participation and scepticism over genuine public influence. Environmental sustainability requires more focus, 27% of comments pushing for biodiversity and sustainable practices. Criticism of regional integration and unmet housing needs comprises 24% of responses, stressing the need for cross-boundary cooperation.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3B2K-B/1/SP1, ANON-AQTS-3BM7-J/1/SP1, ANON-AQTS-3BAF-N/1/SP1, ANON-AQTS-3BAW-6/2/SP1, ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/13/SP1, ANON-AQTS-3BSY-T/20/SP1, ANON-AQTS-3B4C-5/2/SP1, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/10/SP1, ANON-AQTS-3291-8/1/SP1, ANON-AQTS-3B5A-4/2/SP1, ANON-AQTS-3299-G/4/SP1, ANON-AQTS-32UM-Z/1/SP1, ANON-AQTS-329Q-8/10/SP1, ANON-AQTS-32UU-8/1/SP1, ANON-AQTS-32G7-V/4/SP1, ANON-AQTS-32SJ-U/3/SP1, ANON-AQTS-3BQA-Z/4/SP1, ANON-AQTS-32T7-9/3/SP1, ANON-AQTS-3BX4-T/3/SP1, ANON-AQTS-32FT-R - New Airesford Town Council/2/SP1, ANON-AQTS-3BBP-Z/4/SP1, ANON-AQTS-327B-Q/4/SP1, ANON-AQTS-32MY-4/2/SP1, ANON-AQTS-32MD-F/1/SP1, ANON-AQTS-32T4-6/1/SP1, ANON-AQTS-32Z2-A/1/SP1, ANON-AQTS-323A-J/1/SP1, ANON-AQTS-32MQ-V/2/SP1, ANON-AQTS-32ZM-5/3/SP1, BHLF-AQTS-32ED-7/1/SP1, BHLF-AQTS-32EP-K/1/SP1, BHLF-AQTS-32EJ-D/1/SP1, BHLF-AQTS-326Y-D/1/SP1, BHLF-AQTS-3262-6 - Eastleigh Borough Council/1/SP1, BHLF-AQTS-3266-A -Fareham Borough Council/3/SP1, BHLF-AQTS-32YG-X/2/SP1, BHLF-AQTS-32YK-2 - Marine Management Organisation/1/SP1, BHLF-AQTS-3282-8 -Natural England/6/SP1, BHLF-AQTS-328A-Q/1/SP1, BHLF-AQTS-328X-E/4/SP1, BHLF-AQTS-3286-C/4/SP1, BHLF-AQTS-328G-W/4/SP1, BHLF-AQTS-32QE-M/1/SP1, BHLF-AQTS-32QY-8/1/SP1, BHLF-AQTS-32QZ-9/1/SP1

Post Regulation 19 Actions

Further work commissioned and published on Air Quality to inform the Habitats Regulations Assessment.

Main issues raised in representations received in regulation 19 consultation

- Whether the vision and objectives should be included in a Plan policy;
- Whether the Vision and Objectives are sufficiently clear, and whether further flexibility or amendments are required;
- Whether the vision and objectives sufficient address housing affordability and unmet need;
- The closure of Andover Road;

- Whether the Plan will have a fifteen year lifespan following adoption;
- · Alternative and additional sites proposed for development; and
- Whether the Plan meets legal and procedural requirements, given the ongoing work on the HRA.

Local Plan Reference or document	Spatial Strategy and	d Developmei	Policy SP2 nt Principles
Total Number of Repres	entations received		73
Number of respondents who confirmed they consider the policy is – Yes N			
Legally Compliant		31	29
Sound		14	52
Complies with Duty to C	ooperate	27	34

Summary of Representations

The representations highlight several key issues, primarily focusing on spatial strategy, housing needs, and sustainable development. There is broad support for distributing development to Winchester Town and other areas but concerns about overall levels and the spatial strategy, with many suggesting that housing targets should be minimums to meet future needs. The need to prioritise sustainable development is noted, with calls for improved public transport to reduce car dependency and better infrastructure support for new developments. Housing affordability is a critical concern, with many respondents suggesting the proposed amount is insufficient. The feedback also stresses economic growth, advocating for healthcare and social infrastructure investments, addressing community well-being, and better aligning with broader development strategies. Critics highlight the need for the plan to adapt to national policy changes, incorporating flexibility to future-proof the plan given unmet housing need and the proposed revisions to the NPPF and standard method.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BCJ-U/1/SP2, ANON-AQTS-3BAW-6/3/SP2, ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/46/SP2, ANON-AQTS-3BSY-T/59/SP2, ANON-AQTS-3BFT-8 - Crawley Parish Council/6/SP2, ANON-AQTS-3BPH-6/5/SP2, ANON-AQTS-3B4C-5/5/SP2, ANON-AQTS-3B56-S - NHS
Hampshire and Isle of Wight ICB/17/SP2, ANON-AQTS-327T-9/1/SP2, ANON-AQTS-3291-8/6/SP2, ANON-AQTS-329C-T/1/SP2, ANON-AQTS-3B5A-4/6/SP2, ANON-AQTS-3B54-Q/4/SP2, ANON-AQTS-32CD-5 - Colden Common Parish Council/33/SP2, ANON-AQTS-32GC-8/9/SP2, ANON-AQTS-3299-G/12/SP2, ANON-AQTS-32UE-R/3/SP2, ANON-AQTS-32UQ-4/1/SP2, ANON-AQTS-329R-9/4/SP2, ANON-AQTS-329E-V/4/SP2, ANON-AQTS-32NS-Y/7/SP2, ANON-AQTS-329Q-8/28/SP2, ANON-AQTS-32UU-8/5/SP2, ANON-AQTS-32S5-6/1/SP2, ANON-AQTS-32G7-V/10/SP2, ANON-AQTS-32SJ-U/9/SP2, ANON-AQTS-3BQA-Z/16/SP2, ANON-AQTS-327U-A - Southern Water/21/SP2, ANON-AQTS-32T7-

9/9/SP2, ANON-AQTS-32TQ-3/2/SP2, ANON-AQTS-32TM-Y/2/SP2, ANON-AQTS-32TE-Q/2/SP2. ANON-AQTS-3BX4-T/9/SP2. ANON-AQTS-32FT-R - New Alresford Town Council/6/SP2, ANON-AQTS-3BBP-Z/7/SP2, ANON-AQTS-327B-Q/7/SP2, ANON-AQTS-32TW-9/5/SP2, ANON-AQTS-323Y-A/1/SP2, ANON-AQTS-322T-4/4/SP2, ANON-AQTS-32MY-4/5/SP2, ANON-AQTS-32ND-G/1/SP2, ANON-AQTS-32ZT-C/1/SP2, ANON-AQTS-323A-J/4/SP2, ANON-AQTS-322X-8 -Upham Parish Council/1/SP2, ANON-AQTS-32MQ-V/5/SP2, ANON-AQTS-32ZJ-2/2/SP2, BHLF-AQTS-32ED-7/3/SP2, BHLF-AQTS-32EJ-D/3/SP2, BHLF-AQTS-3267-B/6/SP2, BHLF-AQTS-326S-7/1/SP2, BHLF-AQTS-3266-A - Fareham Borough Council/5/SP2. BHLF-AQTS-32YG-X/3/SP2. BHLF-AQTS-32YH-Y -Network Rail/3/SP2, BHLF-AQTS-328Y-F/8/SP2, BHLF-AQTS-3289-F/4/SP2, BHLF-AQTS-3288-E/4/SP2, BHLF-AQTS-328D-T/2/SP2, BHLF-AQTS-328Q-7/11/SP2, BHLF-AQTS-328A-Q/4/SP2, BHLF-AQTS-328P-6/3/SP2, BHLF-AQTS-328V-C/4/SP2, BHLF-AQTS-328X-E/13/SP2, BHLF-AQTS-3286-C/14/SP2, BHLF-AQTS-328G-W/13/SP2, BHLF-AQTS-328N-4/1/SP2, BHLF-AQTS-32QE-M/4/SP2, BHLF-AQTS-32QY-8/7/SP2, BHLF-AQTS-32Q9-8/1/SP2, BHLF-AQTS-32QQ-Z/8/SP2, BHLF-AQTS-32QZ-9/4/SP2, BHLF-AQTS-32QC-J/3/SP2

Post Regulation 19 Actions

- Updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council have been agreed and published (October 2024);
- Consequential changes to Local Plan Table 2 (page 216) to reflect the approach agreed in the updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council are included in the Proposed Modifications (November 2024); and
- A Housing Topic Paper Update will be produced to address some key issues arising from the consultation, particularly the proposed changes to the NPPF, the Plan period, the derivation of the unmet housing need figure, updated housing land supply information, and details of the housing trajectory and 5-year land supply (to be published following submission of the Local Plan).

Main issues raised in representations received in regulation 19 consultation

- Whether the level and distribution of development set out in the Policy is appropriate;
- Whether levels of housing development should be expressed as minimums;
- Whether the Policy adequately supports the need for employment land; and
- Whether the Policy should be amended to reflect the Government's proposed changes to the NPPF and standard method for assessing housing need.

Local Plan Reference or document	Develo	Policy SP3 ppment in the Countryside
Total Number of Represe	ntations received	23

Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	15	4
Sound	10	13
Complies with Duty to Cooperate	13	4

Summary of Representations

A significant portion of the comments (61% of the responses) focus on sustainable development and environmental considerations, welcoming efforts to protect biodiversity but raising issues about the restrictive nature of developments outside settlement boundaries, which could hamper growth around urban centres like Winchester City. In terms of protecting local assets and countryside, 57% expressed concerns that overly restrictive policies may limit sustainable development opportunities near these boundaries. 52% of respondents sought more flexibility to achieve growth without compromising rural character. The need for an adaptable housing supply policy, voiced by 39% of respondents, suggests revising settlement boundaries to include suitably situated land, such as brownfield sites, to ensure enough housing provision. Lastly, 9% of responses touch on infrastructure provision and economic growth, advocating policy amendments to facilitate necessary utilities and recognize mineral safeguarding areas.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BAW-6/1/SP3, ANON-AQTS-3BEW-A - Littleton and Harestock
Parish Council/4/SP3, ANON-AQTS-3BSY-T/9/SP3, ANON-AQTS-3B4C5/1/SP3, ANON-AQTS-3B5A-4/1/SP3, ANON-AQTS-32CD-5 - Colden Common
Parish Council/6/SP3, ANON-AQTS-32UK-X - Environment Agency/3/SP3,
ANON-AQTS-32NT-Z/1/SP3, ANON-AQTS-32NR-X/2/SP3, ANON-AQTS-32G7V/1/SP3, ANON-AQTS-327U-A - Southern Water/7/SP3, ANON-AQTS-32SB-K Defence Infrastructure Organisation/1/SP3, ANON-AQTS-32F8-V/1/SP3,
ANON-AQTS-32TW-9/1/SP3, ANON-AQTS-322T-4/1/SP3, BHLF-AQTS-326ES/1/SP3, BHLF-AQTS-3267-B/1/SP3, BHLF-AQTS-32YG-X/1/SP3, BHLF-AQTS3282-8 - Natural England/2/SP3, BHLF-AQTS-328S-9/1/SP3, BHLF-AQTS-328P6/2/SP3, BHLF-AQTS-328K-1/2/SP3, BHLF-AQTS-32QQ-Z/1/SP3

Post Regulation 19 Actions

Changes to Local Plan policy SP3 (page 27) is included in the Proposed Modifications (November 2024) to clarify the position regarding potential flood risk and the best and most versatile agricultural land, as well as recognise the need for essential infrastructure to sometimes be located in the countryside.

Main issues raised in representations received in regulation 19 consultation

- Whether the policy should explicitly recognise the sustainability of locations immediately adjacent to existing settlement boundaries or previously developed land;
- Whether countryside designation should remain on sites allocated for development;
- Whether the policy should be more explicit in the importance of soils, in particular the best and most versatile agricultural land;
- Whether there should be further changes to the settlement boundaries as a result of various development proposals; and

Whether the policy should align with the Local Nature Recovery Strategy.

Carbon Neutrality and Designing for Low Carbon Infrastructure

Local Plan Reference or document	Policy CN1 Mitigating and Adapting to Climate Change		
Total Number of Repres	presentations received. 31		
Number of respondents consider the policy is –			
Legally Compliant 23		4	
Sound		13	15
Complies with Duty to C	ooperate	25	2

Summary of Representations

58% of responses received support the policies in the Local Plan that aim for a net-zero district by 2030. Key issues identified include the need for clear policy clarity and viability, as 35% of comments expressed concerns over ambiguous language and the potential impact of these policies on affordable housing, 29% of comments focus on aligning local plans with national standards to maintain relevance amidst changing regulations. 26% of the comments received comment on environmental impact and green infrastructure and the need to integrate nature-based solutions while addressing financial viability. 23% of the comments refer to transportation and emissions and concern that they were lacking robust targets, urging improvements like enhanced public transport to meet net zero goals. Concerns was raised on the need to balance development viability and stringent environmental targets, urging flexible policy criteria to accommodate sitespecific challenges. Transportation and local infrastructure considerations account for 13%, and the need to minimise car dependency. Renewable energy and water conservation focus was supported and the need to prioritise climate challenges in planning.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/24/CN1,
ANON-AQTS-3BSY-T/35/CN1, ANON-AQTS-3BB7-7/1/CN1, ANON-AQTS-3B4K-D/4/CN1, ANON-AQTS-3291-8/3/CN1, ANON-AQTS-32CD-5 - Colden Common
Parish Council/21/CN1, ANON-AQTS-32GC-8/5/CN1, ANON-AQTS-32GG-C/5/CN1, ANON-AQTS-32UM-Z/3/CN1, ANON-AQTS-32NS-Y/4/CN1, ANON-AQTS-3B5G-A/3/CN1, ANON-AQTS-32NR-X/6/CN1, ANON-AQTS-329Q-8/15/CN1, ANON-AQTS-32UU-8/3/CN1, ANON-AQTS-32U5-8/3/CN1, ANON-AQTS-3BQA-Z/7/CN1, ANON-AQTS-327U-A - Southern Water/15/CN1, ANON-AQTS-3BX4-T/5/CN1, ANON-AQTS-32FT-R - New Alresford Town
Council/3/CN1, ANON-AQTS-32TW-9/3/CN1, ANON-AQTS-3B8M-K/6/CN1, BHLF-AQTS-32EK-E - Test Valley Borough Council/4/CN1, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/7/CN1, BHLF-AQTS-3282-8 -

Natural England/8/CN1, BHLF-AQTS-328X-E/8/CN1, BHLF-AQTS-3286-C/8/CN1, BHLF-AQTS-328G-W/8/CN1, BHLF-AQTS-328K-1/7/CN1, BHLF-AQTS-32QY-8/5/CN1, BHLF-AQTS-32QQ-Z/5/CN1

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England: Addition of new criterion between criterion vii and viii on page 33.

The Carbon Neutrality and Embodied Carbon Topic Paper has been updated (November 2024)

https://www.localplan.winchester.gov.uk/assets/attach/564/Carbon-Neutrality-and-Embodied-Carbon-FINAL-Nov-2024.pdf

Main issues raised in representations received in regulation 19 consultation.

- Whether Policy CN1 should include specific targets and how these could be monitored;
- Aligning the policies in the Local Plan on net-zero standards with national standards;
- Transport and enhanced public transport to reduce car dependency; and
- Renewable energy and water conservation focus was supported.

Local Plan Reference or document	Policy CN2 Energy Hierarchy	
Total Number of Representations received.		17
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	15	1
Sound	6	10
Complies with Duty to Cooperate	15	1

Summary of Representations

There was a strong focus of Policy CN2 on energy efficiency and the implementation of renewable energy sources. There was widespread support for a 'fabric first approach', emphasising the importance of reducing energy demand through enhanced building design, but also a call for clearer guidance to avoid confusion during implementation. Concerns were raised about policy clarity (35%) particularly between policies CN1 and CN2. The transition towards net zero was highlighted and the feasibility of achieving complete reliance on renewable sources due to current technological and infrastructure constraints. The need to maintain high quality design and address heritage issues whilst at the same time ensuring that there are no potential conflicts with energy-saving measures. Feasibility and financial viability were raised along with changes to policy, technology and economic changes. Public engagement and effectiveness of the policy were also raised as a concern. Overall, the feedback indicates a need for a

balanced approach that considers aspirations of the policy against practical and financial realities.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/40/CN2,
ANON-AQTS-3BSY-T/53/CN2, ANON-AQTS-3BB7-7/3/CN2, ANON-AQTS-3B4K-D/6/CN2, ANON-AQTS-32CD-5 - Colden Common Parish Council/31/CN2,
ANON-AQTS-32GC-8/8/CN2, ANON-AQTS-32GG-C/8/CN2, ANON-AQTS-32NS-Y/6/CN2, ANON-AQTS-329Q-8/24/CN2, ANON-AQTS-32U8-B - Historic
England/4/CN2, ANON-AQTS-3BQA-Z/14/CN2, ANON-AQTS-3BX4-T/8/CN2,
ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/13/CN2,
BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/13/CN2,
BHLF-AQTS-328X-E/12/CN2, BHLF-AQTS-3286-C/12/CN2, BHLF-AQTS-328G-W/12/CN2]

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England: Additional paragraph to be added between after paragraph 4.17, changes to paragraph 4.19 and 4.20 and wording of Policy CN2.

The Carbon Neutrality and Embodied Carbon Topic Paper has been updated (November 2024)

https://www.localplan.winchester.gov.uk/assets/attach/564/Carbon-Neutrality-and-Embodied-Carbon-FINAL-Nov-2024.pdf

Main issues raised in representations received in regulation 19 consultation.

- Support for the wording of Policy CN2 in terms of the 'fabric first approach';
- Concern about the clarity between Policy CN1 and CN2;
- Concern about the reliance on renewable sources due to current technological and infrastructure constraints; and
- Need to ensure that the need for renewable energy is balanced against the need for high quality design and heritage issues.

Local Plan Reference or document	Policy CN3 Energy Efficiency Standards to Reduce Carbon Emissions		
Total Number of Repres			
Number of respondents consider the policy is –			
Legally Compliant	19 10		10
Sound		5	25
Complies with Duty to C	ooperate	22	7

Summary of Representations

The key concerns about Policy CN3 relate to its cost implications, technical challenges, and its alignment with national standards. Comments highlight that the

stringent energy efficiency and zero-carbon targets in Policy CN3 could significantly raise construction costs by up to 20%, potentially impacting the viability of housing projects. The requirement for 100% on-site renewable energy is seen as impractical due to current grid limitations and infrastructure needs, posing risks to the affordability and housing delivery. Additionally, there is a consensus on the necessity for the alignment of Policy CN3 with national standards, like the forthcoming Future Homes Standard, to ease industry adaptation and the need to maintain consistency. Technical feasibility is another concern, as existing construction skills and materials may be inadequate for meeting the ambitious targets. Suggestions include adopting a phased approach and allowing deviations for site-specific conditions to mitigate adverse effects on housing supply. Concern was raised about achieving sustainability which sometimes conflicts with preserving heritage and high-quality design. This point relates to the integration of modern technology in historic settings. Finally, effective monitoring and compliance mechanisms are essential in order to ensure the successful implementation of the policy without hindering development progress.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BEV-9/1/CN3, ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/39/CN3, ANON-AQTS-3BSY-T/52/CN3, ANON-AQTS-3BPH-6/4/CN3, ANON-AQTS-3BB7-7/2/CN3, ANON-AQTS-3B4K-D/5/CN3, ANON-AQTS-3291-8/5/CN3, ANON-AQTS-32CD-5 - Colden Common Parish Council/30/CN3, ANON-AQTS-32GC-8/7/CN3, ANON-AQTS-32GG-C/7/CN3, ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council/1/CN3, ANON-AQTS-3298-F/7/CN3, ANON-AQTS-32G3-R/4/CN3, ANON-AQTS-32NR-X/8/CN3, ANON-AQTS-329Q-8/23/CN3, ANON-AQTS-32UU-8/4/CN3, ANON-AQTS-32U8-B - Historic England/3/CN3, ANON-AQTS-32G7-V/9/CN3, ANON-AQTS-32SJ-U/8/CN3, ANON-AQTS-3BQA-Z/13/CN3, ANON-AQTS-32T7-9/8/CN3, ANON-AQTS-3BX4-T/7/CN3, ANON-AQTS-3BBP-Z/6/CN3, ANON-AQTS-327B-Q/6/CN3, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/12/CN3, ANON-AQTS-32ZJ-2/1/CN3, BHLF-AQTS-3265-9 -Hampshire Hospitals NHS Foundation Trust/12/CN3, BHLF-AQTS-328Q-7/9/CN3, BHLF-AQTS-328X-E/11/CN3, BHLF-AQTS-3286-C/11/CN3, BHLF-AQTS-328G-W/11/CN3, BHLF-AQTS-328K-1/10/CN3

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England: paragraph 4.24 and change to the wording of Policy CN3.

The Carbon Neutrality and Embodied Carbon Topic Paper has been updated (November 2024)

https://www.localplan.winchester.gov.uk/assets/attach/564/Carbon-Neutrality-and-Embodied-Carbon-FINAL-Nov-2024.pdf

Main issues raised in representations received in regulation 19 consultation.

- Cost implications of implementing Policy CN3, technical challenges, and its alignment with national standards;
- The requirement for 100% on-site renewable energy is seen as impractical due to current grid limitations;

- Alignment of Policy CN3 with national standards, like the forthcoming Future Homes Standard;
- Technical feasibility as existing construction skills and materials may be inadequate for meeting the ambitious targets and whether there should be a phased approach towards the implementation of this policy; and
- Effective monitoring and compliance mechanisms are essential in order to ensure the successful implementation of the policy without hindering development progress.

Local Plan Reference or document	Policy CN4 Water Efficiency Standards in New Developments		
Total Number of Repres	esentations received. 17		17
Number of respondents consider the policy is –	mber of respondents who confirmed they nsider the policy is –		No
Legally Compliant		12	3
Sound		9	6
Complies with Duty to C	ooperate	14	1

Summary of Representations

The key point about Policy CN4 is the proposed water efficiency target of 100 litres per person per day. This target is linked with Southern Water's initiatives to reduce consumption, yet some comments point out that this deviates from the Environment Agency's recommended 110 litres benchmark for water-stressed regions. The difference between the two standards has raised concern regarding the policy's alignment with national guidelines and its practicality. While Southern Water and some of the other comments support this water efficiency target, (as this is considered to be crucial for water sustainability/climate challenges) developers and other comments question its feasibility and potential impact on development costs, suggesting that it might not be achievable without incurring additional expenses. Suggestions that there should be a phased approach to the implementation of this policy but it is acknowledged that implementing these changes will require behavioural changes and technological advancements to ensure long-term water resilience.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/11/CN4,
ANON-AQTS-3BSY-T/17/CN4, ANON-AQTS-3B4K-D/2/CN4, ANON-AQTS-32CD-5 - Colden Common Parish Council/11/CN4, ANON-AQTS-32GG-C/3/CN4,
ANON-AQTS-32G3-R/2/CN4, ANON-AQTS-32UK-X - Environment
Agency/6/CN4, ANON-AQTS-329Q-8/8/CN4, ANON-AQTS-3BQA-Z/3/CN4,
ANON-AQTS-327U-A - Southern Water/10/CN4, ANON-AQTS-3BBP-Z/3/CN4,
ANON-AQTS-327B-Q/3/CN4, BHLF-AQTS-328Q-7/4/CN4, BHLF-AQTS-328X-E/3/CN4, BHLF-AQTS-3286-C/3/CN4, BHLF-AQTS-328G-W/3/CN4, BHLF-AQTS-32QQ-Z/3/CN4

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation.

- The water efficiency target in Policy CN4 which comes from Southern Water deviates from the Environment Agency's target for water efficiency;
- Developers have raised the issue of the cost of implementing this policy and whether there could be a phased approach; and
- Implementing these changes will require behavioural changes and technological advancements to ensure long-term water resilience and to address concerns over the policy's soundness.

Local Plan Reference or document	Renewable and Low	Carbon Enerç	Policy CN5 gy Schemes
Total Number of Repres	esentations received. 9		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		7	0
Sound		4	3
Complies with Duty to C	ooperate	7	0

Summary of Representations

The key concerns are balancing the need for green energy renewable energy development with other priorities. There is a need to ensure that renewable projects do not negatively impact military operations or aviation safety, with the Ministry of Defence expressing the need for clarity in policy CN5 to protect national security. Visual impact and environmental protection are also highlighted, with clearer criteria to prevent subjective judgements that might hinder viable projects. Concerns were expressed regarding the language in the policy, like "significant impact," which is considered to prevent renewable energy developments. Other concerns relate to covering agricultural land with solar panels and the potential negative effects that this could have on food production and local carbon footprints. There was support for on-site renewable energy generation which could minimise the dependency on larger renewable energy scheme but there were also concerns about the capacity of the energy grid network to be able to cope with this change. There were comments about the urgency of the need for renewable energy projects in order to help with energy security and to address the increase cost of living. Overall, there was support renewable energy generation but this needs to be balanced against environmental, operational, and security challenges.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/70/CN5,
ANON-AQTS-3BSY-T/93/CN5, ANON-AQTS-3BR7-Q/1/CN5, ANON-AQTS-3B4K-D/8/CN5, ANON-AQTS-32CD-5 - Colden Common Parish Council/49/CN5,
ANON-AQTS-32UK-X - Environment Agency/19/CN5, ANON-AQTS-32TW-9/8/CN5, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation

Trust/20/CN5, BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/3/CN5

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England regarding changing the wording of criterion iv of Policy CN5.

Main issues raised in representations received in regulation 19 consultation.

- The need to balance the need for green energy renewable energy development with other priorities;
- Ensure that renewable projects do not negatively impact military operations or aviation safety;
- Visual impact and environmental protection with clearer criteria to prevent subjective judgements that might hinder viable projects;
- Concerns were raised about covering agricultural land with solar panels and the potential negative effects that this could have on food production and local carbon footprints;
- On-site renewable energy generation is encouraged in order to minimise dependency on larger renewable energy scheme but there were also concerns about the capacity of the energy grid network to be able to cope with this change; and
- The need for energy projects in order to help with energy security and to address increase cost of living.

Local Plan Reference or document	Micro Ene	ergy Generation	Policy CN6 on Schemes
Total Number of Repres	entations received.		7
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		6	0
Sound		5	1
Complies with Duty to C	ooperate	6	0

Summary of Representations

There are concerns around the prioritisation of historical significance versus climate change initiatives. Around 43% of comments call for a shift in focus from preserving historical importance towards embracing renewable energy generation and climate action. Trusts and other stakeholders are encouraging amendments to the wording of the policy which is considered to have too much emphasis on historical concerns, suggesting that integrating ground source heat pumps, air source heat pumps, and solar energy which can promote healthier environments. However, there is a shared concern about the ability of the Distribution Network Operator network to support this shift before 2031. Whilst renewable energy integration is considered to be critical, the wording in the policy still places considerable weight on historical preservation, potentially constraining the

advancement of green energy technologies. This reflects the broader uncertainty on how best to reconcile heritage conservation with the urgent need for environmental reforms.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/48/CN6,
ANON-AQTS-3BSY-T/61/CN6, ANON-AQTS-3B4K-D/7/CN6, ANON-AQTS-32CD5 - Colden Common Parish Council/35/CN6, ANON-AQTS-32UK-X Environment Agency/14/CN6, ANON-AQTS-32Z7-F - Hampshire Hospitals
NHS Foundation Trust/14/CN6, BHLF-AQTS-3265-9 - Hampshire Hospitals
NHS Foundation Trust/14/CN6

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England regarding the wording of Policy CN6.

Main issues raised in representations received in regulation 19 consultation.

- Concerns relate to the prioritisation of historical significance versus climate change initiatives and the need to embrace renewable energy generation;
- There is considered to be too much emphasis on the historic environment.
- There is shared concern about the ability of the Distribution Network Operator network to support this shift before 2031; and
- Uncertainty on how best to reconcile heritage conservation with the urgent need for environmental reforms.

Local Plan Reference or document	Ene	Policy CN7 ergy Storage
Total Number of Representations received.		4
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	4	0
Sound	3	1
Complies with Duty to Cooperate	4	0

Summary of Representations

There is support for prioritising climate change adaptation and mitigation within policies, particularly policies CN1-8. However, there are concerns about the restrictive wording of criterion (iv) in policy CN7, which it is considered may hinder large-scale installations and conflict with climate emergency objectives. This issue presents a challenge in effectively embedding climate priorities in the policy framework. Some of the responses request that the wording of Policy CN7 is revised to promote a better alignment with sustainability goals. Additionally, the importance of co-locating infrastructure points towards the need for innovative policies that support sustainable development practices without compromising

environmental standards. There is the need for policies that support or incentivise the combined use of space for energy storage.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/14/CN7,
ANON-AQTS-3BSY-T/21/CN7, ANON-AQTS-3B4K-D/3/CN7, ANON-AQTS-32CD5 - Colden Common Parish Council/15/CN7

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation.

- Support for prioritising climate change adaptation and mitigation within policies, particularly policies CN1-8;
- Concerns about the restrictive wording of criterion (iv) in policy CN7, which
 it is considered may hinder large-scale installations and conflict with climate
 emergency objectives;
- Some of the responses request that the wording of Policy CN7 is revised to promote a better alignment with sustainability goals; and
- There is the need for policies that support or incentivise the combined use of space for energy storage.

Local Plan Reference or document	Embo	Policy CN8 died Carbon
Total Number of Representations received.		17
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	13	3
Sound	6	10
Complies with Duty to Cooperate	16	0

Summary of Representations

There were concerns regarding Policy CN8, primarily relating to embodied carbon and its assessment process. There was an awareness of the significance of embodied carbon in meeting climate targets; however, there were concerns over the absence of consistent data across the construction supply chain, especially among smaller developers, questioning the feasibility of early-stage carbon assessments. There were calls for clearer guidelines within the policy with demands for specific limits at different project stages and the need for alignment with national standards for consistency. Developers, particularly small and medium-sized ones, have pointed out that they may face challenges due to the policy's current requirements, owing to the limited capacity to effect change in supply chains and the potential strain on development viability. Concerns were raised regarding whether embodied carbon should be governed at a national level in order to ensure uniformity. Overall, while the policy's goals are supported, comments centred around the need for greater clarity, flexibility, and national

compliance to make implementation practical and fair across different developer sizes.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/2/CN8, ANON-AQTS-3BSY-T/7/CN8, ANON-AQTS-3B4K-D/1/CN8, ANON-AQTS-32CD-5 - Colden Common Parish Council/3/CN8, ANON-AQTS-32GC-8/1/CN8, ANON-AQTS-32GG-C/1/CN8, ANON-AQTS-32NS-Y/1/CN8, ANON-AQTS-329Q-8/2/CN8, ANON-AQTS-32U5-8/1/CN8, ANON-AQTS-3274-9/1/CN8, ANON-AQTS-3BQA-Z/1/CN8, ANON-AQTS-3BBP-Z/1/CN8, ANON-AQTS-327B-Q/1/CN8, BHLF-AQTS-328Q-7/2/CN8, BHLF-AQTS-328X-E/2/CN8, BHLF-AQTS-328G-C/2/CN8, BHLF-AQTS-328G-W/2/CN8

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation.

- Concerns regarding Policy CN8, primarily relate to embodied carbon and its assessment process;
- Concerns over the absence of consistent data across the construction supply chain, especially among smaller developers, questioning the feasibility of early-stage carbon assessments;
- Calls for clearer guidelines within the policy with demands for specific limits at different project stages and alignment with national standards for consistency.
- Whether embodied carbon should be governed at a national level to ensure uniformity; and
- While the policy's goals are supported, comments centred around the need for greater clarity, flexibility, and national compliance to make implementation practical and fair across different developer sizes.

High Quality Well-Designed Places and Living Well

Local Plan Reference or document	High Quality, Well Desig	ned and Inclu	Policy D1 sive Places
Total Number of Represe	sentations received 23		23
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		13	4
Sound		11	8
Complies with Duty to C	ooperate	16	1

Summary of Representations

Support for the wider context of this policy and the importance of planning for an ageing population; ensuring places are accessible and there is access to services and facilities. Although some respondents request that the policy refers to

'inclusive' and 'communities' in terms of place making and creating well designed places.

A number of respondents represent the utility industry and they highlight the importance of involving diverse stakeholders, in development processes, particularly around pre-existing infrastructure. Similarly respondents refer to the need for integration of green infrastructure into design processes to improve outcomes for environmental benefits and local character.

Policy lacks reference to the evidence base and the provision for sport and active recreation as a feature of high quality, well-designed places. Sport England considers that there is synergy with their Active Design guidance and request references is made to this in the proposed policy.

Recognition that good design is essential, there needs to be an emphasis on designing and building good quality homes that minimise damage to the environment and maximise the efficient use of land. There is support for the need to use high-quality durable materials appropriate to context and building design.

Policy should be applied with suitable flexibility in recognition that it may not be possible to achieve all the principles set out in the policy on all sites in all locations. Some terms used in the policy need clarification/definition e.g. attractive as this is open to interpretation.

A number of respondents specifically refer to the matter of design in relation to Winchester Town rather than to the expression of Policy D1.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BDP-2/6/D1, ANON-AQTS-3BEW-A - Littleton and Harestock
Parish Council/65/D1, ANON-AQTS-3BSY-T/86/D1, ANON-AQTS-3B56-S - NHS
Hampshire and Isle of Wight ICB/33/D1, ANON-AQTS-32CD-5 - Colden
Common Parish Council/47/D1, ANON-AQTS-329Q-8/37/D1, ANON-AQTS-32UU-8/8/D1, ANON-AQTS-3BX4-T/13/D1, ANON-AQTS-323A-J/8/D1, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/19/D1, ANON-AQTS-32ZS-B/7/D1, ANON-AQTS-3295-C/1/D1, BHLF-AQTS-326P-4/9/D1,
BHLF-AQTS-326V-A - National Grid Electricity Transmission/1/D1, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/19/D1, BHLF-AQTS-329H-Y - Network Rail/6/D1, BHLF-AQTS-328Q-7/16/D1, BHLF-AQTS-328X-E/20/D1,
BHLF-AQTS-3286-C/19/D1, BHLF-AQTS-328G-W/18/D1, BHLF-AQTS-328K-1/19/D1, BHLF-AQTS-32QQ-Z/12/D1

Post Regulation 19 Actions

- Modification proposed to D1 for clarification and to supporting text to reflect representations by utility organisations.
- Proposed modification to supporting text para. 5.38 to note utility infrastructure.
- Proposed modification to supporting text para. 5.40 to provide examples of relevant national guidance.

• Proposed modification to remove reference to Open Space Improvement Plan from table of relevant local evidence on page 74.

Main issues raised in representations received in regulation 19 consultation

- Ensure the policy is inclusive;
- Policy needs flexibility to be able to be applied on different sites in different locations: and
- Need to ensure matters such as green infrastructure and the provision of utilities are included in the design process from the outset.

Local Plan Reference or document	Policy D2 Design Principles for Winchester Town		
Total Number of Repres	esentations received 16		
Number of respondents consider the policy is –	ents who confirmed they Yes No is –		
Legally Compliant		7	4
Sound		5	9
Complies with Duty to C	Cooperate	7	4

Summary of Representations

Representations cover various urban development issues in Winchester, including objection to:

- Relocation of the bus station.
- Closure of Andover Road to through traffic

A number question the funnelling of traffic through the city centre and the lack of proposed solutions to resolve this, including a request for a spatial plan for Winchester Town being considered as movement is fundamental to the success of the development sites and how the whole Town functions. A coherent spatial plan provides the opportunity to integrating community views and addressing the city's unique character while promoting sustainable development.

Some representations refer to the enhancement of healthcare and other social infrastructure within the urban area of the City.

The policy needs to incorporate an element of flexibility through addition of 'where appropriate to the development proposed' prior to the criteria listed.

Another respondent questions the need for the policy in that most of it is a repetition of D1

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/62/D2, ANON-AQTS-3BSY-T/82/D2, ANON-AQTS-32CD-5 - Colden Common Parish

Council/45/D2, ANON-AQTS-32UZ-D/4/D2, ANON-AQTS-32G7-V/14/D2, ANON-AQTS-32TP-2/1/D2, ANON-AQTS-323A-J/6/D2, ANON-AQTS-32MQ-V/8/D2, BHLF-AQTS-326P-4/7/D2, BHLF-AQTS-32YT-B/1/D2, BHLF-AQTS-32YQ-8/6/D2, BHLF-AQTS-32YB-S/1/D2, BHLF-AQTS-32YH-Y - Network Rail/5/D2, BHLF-AQTS-328X-E/19/D2, BHLF-AQTS-328G-W/17/D2, BHLF-AQTS-328K-1/17/D2

Post Regulation 19 Actions

Proposed Change to criterion x in Policy D2 in order to improve clarity and consistency with the wording of paragraph 5.50 in the Local Plan.

Main issues raised in representations received in regulation 19 consultation

- Need for clarity, flexibility and to avoid repletion with Policy D1 and other policies in the Design Topic; and
- Consider preparation of a spatial plan for Winchester with the topic of movement as a basis, to ensure appropriately located development.

Local Plan Reference or document	Design Principles for the South	n Hampshire l	Policy D3 Jrban Areas
Total Number of Repres	entations received		4
Number of respondents who confirmed they Yes consider the policy is –		No	
Legally Compliant		3	0
Sound		3	0
Complies with Duty to C	Cooperate	3	0

Summary of Representations

One focussed representation from a developer, which refers to on ensuring highquality design proposals that comply with strategic policies, with particular emphasis on aligning with Strategic Policies D1 and D3, with reference to the development of North Whiteley MDA.

A comment was made from a neighbouring LPA that they support the design focused approach. They would welcome more detail on the exact areas to which the policy applies (plan). Support is given to the design of new strategic scale development on the edges of South Hampshire having regard to the existing communities which that development would adjoin, including those communities in Winchester's neighbouring LPAs areas.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/77/D3, ANON-AQTS-32CD-5 - Colden Common Parish
Council/43/D3, ANON-AQTS-32UU-8/7/D3, BHLF-AQTS-32Q2-1/1/D3
Portsmouth City Council

Post Regulation 19 ActionsNone

Main issues raised in representations received in regulation 19 consultation

- Ensuring high-quality design proposals that comply with strategic policies;
- Support for the design focused approach; and
- More detail on the area that this would apply.

Local Plan Reference or document	Design Principles for Market	Towns and Rเ	Policy D4 ural Villages
Total Number of Represe	esentations received 7		
Number of respondents consider the policy is –	<u> </u>		No
Legally Compliant		5	1
Sound		2	4
Complies with Duty to C	ooperate	5	1

Summary of Representations

Some representations question the out of date evidence base and the lack of public transport in the rural parts of the district so there is a lack of opportunity for sustainable travel, contrary to where some of the proposed allocations are located. A representation questions the value of D4 noting its unnecessary overlap with Policy D1.

Concerns about prioritising local input over professional assessments in design and conservation, particularly within village settings, highlighting a preference for community-driven village design statements.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BSY-T/58/D4, ANON-AQTS-3B4C-5/4/D4, **ANON-AQTS-32CD-5 - Colden Common Parish Council/32/D4**, ANON-AQTS-329Q-8/27/D4, ANON-AQTS-32TW-9/4/D4, BHLF-AQTS-328Q-7/10/D4, BHLF-AQTS-3286-C/13/D4

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

Need to avoid repletion with Policy D1.

Local Plan Reference or document		Policy Da Masterplan	
Total Number of Represe	ntations received		18
Number of respondents v	vho confirmed they	Yes	No

Legally Compliant	13	3
Sound	3	14
Complies with Duty to Cooperate	13	3

Various respondents raise multiple concerns regarding drafting of Policy D5, primarily revolving around its clarity and impact on planning and development processes. In particular there is concern about vague definitions and unclear criteria, which could cause delays and increase costs, potentially deterring development investment on complex and large sites. The policy also needs to look beyond the boundary of the application site and take into consideration the broader public realm and setting of the site, particularly with regard to the need and implementation of transport and other public realm features which do not stop at the site boundary.

There is also reference to that it is unclear how masterplans would be secured – if this is to be through the planning application process then this needs to be stated.

Respondents have requested clearer definitions and procedures, with more specific guidance on requirements and flexibility. This includes consideration for sites with historic permissions or minor developments to avoid unnecessary burdens. In addition, larger sites which may come forward in phases - the policy uses two definitions within the same policy which will cause confusion as to whether the intention of the policy is different depending on how the site is defined.

Reference is also made to the need for community engagement and environmental considerations (including blue/green infrastructure), ensuring these are integral to the planning process.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/73/D5, ANON-AQTS-3BSY-T/96/D5, ANON-AQTS-3BFT-8 - Crawley Parish Council/8/D5,
ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/37/D5, ANON-AQTS-3291-8/10/D5, ANON-AQTS-32CD-5 - Colden Common Parish
Council/50/D5, ANON-AQTS-32GG-C/10/D5, ANON-AQTS-32G3-R/5/D5, ANON-AQTS-32UM-Z/7/D5, ANON-AQTS-32UK-X - Environment Agency/20/D5,
ANON-AQTS-32NR-X/10/D5, ANON-AQTS-329Q-8/39/D5, ANON-AQTS-32U5-8/7/D5, ANON-AQTS-32G7-V/16/D5, ANON-AQTS-3BX4-T/14/D5, ANON-AQTS-32SB-K - Defence Infrastructure Organisation/9/D5, BHLF-AQTS-32YQ-8/7/D5,
BHLF-AQTS-328K-1/20/D5

Post Regulation 19 Actions

Proposed modifications in response to comments from Environment Agency in relation to criterion xii in Policy D5.

- Policy lacks clarity in terms of its application to larger/phased sites;
- Unclear as to how masterplans will be secured; and
- Policy needs to enable masterplans to reflect the area beyond the site in terms of a sites relationship with the wider public realm.

Local Plan Reference	Policy D6		
or document	Previously Developed Land	d and Making	Best Use of
			Land
Total Number of Represe	entations received		18
_			
Number of respondents who confirmed they Yes		No	
consider the policy is -			
Legally Compliant		11	3
Sound		4	14
Complies with Duty to C	ooperate	13	0

A number of respondents refer to the lack of clarity as the policy only refers to sites within settlements rather than those in the countryside which are in sustainable and accessible locations, which could make a valuable contribution to development needs and reducing carbon footprint without detriment to landscape quality and biodiversity.

Concern there is an over reliance/favour for brownfield sites in terms of restricting the delivery of greenfield sites which runs contrary to the requirements of NPPF, potentially affecting housing delivery, including affordable housing. There is also reference questioning how the Council intends to prioritise previously developed land (PDL) through the decision-making process.

A representation refers to the historic under delivery of brownfield sites (Central Winchester and Station Approach) so these should not be relied upon for housing delivery including affordable housing.

There are calls for a more balanced approach, acknowledging both brownfield and greenfield opportunities to meet housing needs efficiently, in recognition that brownfield sites often face viability challenges.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/10/D6, ANON-AQTS-3BSY-T/16/D6, ANON-AQTS-32CD-5 - Colden Common Parish
Council/10/D6, ANON-AQTS-32GC-8/3/D6, ANON-AQTS-32GG-C/2/D6, ANON-AQTS-3298-F/2/D6, ANON-AQTS-32NS-Y/2/D6, ANON-AQTS-32NR-X/3/D6,
ANON-AQTS-329Q-8/7/D6, ANON-AQTS-3BQA-Z/2/D6, ANON-AQTS-3BBP-Z/2/D6, ANON-AQTS-327B-Q/2/D6, ANON-AQTS-32MQ-V/1/D6, BHLF-AQTS-32EE-8/1/D6, BHLF-AQTS-326E-S/2/D6, BHLF-AQTS-328K-1/4/D6

Post Regulation 19 Actions

None

- Need to clarify the position with brownfield sites outside of settlement boundaries but in sustainable accessible locations.
- Concern about reliance on brownfield sites for housing delivery given lack of progress with sites in Winchester (Station Approach, Central Winchester).

 Need to determine compliance with NPPF in terms of prioritising previously developed land (PDL) through the decision-making process.

Local Plan Reference or document	Developmen	Policy D7 at Standards
Total Number of Representations received		4
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	0
Sound	2	1
Complies with Duty to Cooperate	3	0

Summary of Representations

There is general support to development standards to minimise impact on the environment and the countryside.

A respondent considers that the Policy is unnecessary as it requires compliance with existing statutory standards for environmental quality and proposals are required to be accompanied by a statement setting out how such requirements have been met in designing the proposal, whereas another supports the requirements of the policy.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/10/D7, **ANON-AQTS-32CD-5 - Colden Common Parish Council/7/D7**, ANON-AQTS-329Q-8/3/D7, BHLF-AQTS-328Q-7/3/D7

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

 Question the need for the policy given it reflects published statutory standards.

Local Plan Reference or document		Contam	Policy D8 inated Land
Total Number of Represe	entations received		5
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		4	1
Sound		3	2
Complies with Duty to C	ooperate	4	1
Summary of Representa	tions	-	

Support for contaminated land to be de-contaminated, so that it can be used for development. This should have priority over developing greenfield sites. However, other representations refer to the fact that remediation of land can add significant costs to a development and that this needs to be consider whether other development benefits are requested such as affordable housing and other community gains – this matter should be reflected in the policy.

Request that the policy clarifies that site investigations and risk assessments can be secured as part of planning conditions, to ensure there will be no unacceptable impacts on human health or the wider environment.

Agree with ground and surface water pollution being referred to separately in the policy.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/38/D8, ANON-AQTS-32CD-5 - Colden Common Parish
Council/23/D8, ANON-AQTS-32UK-X - Environment Agency/9/D8, ANON-AQTS-32G7-V/7/D8, ANON-AQTS-32SB-K - Defence Infrastructure
Organisation/7/D8

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Need to consider remediation costs vis a vis other benefits being sought as part of a proposal to ensure a site is not deemed unviable; and
- Consider referring to using planning conditions to secure site investigations, risk management and remediation measures on sites.

Local Plan Reference or document			Policy D9 Shopfronts
Total Number of Repres	entations received		2
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		2	0
Sound		2	0
Complies with Duty to C	Cooperate	2	0
Cummon, of Donasoonte	tions.		

Summary of Representations

Policy is well thought out.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/97/D9, ANON-AQTS-32CD-5 - Colden Common Parish
Council/51/D9

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation None

Local Plan Reference or document		Policy D10 Signage
Total Number of Representations received		3
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	1
Sound	2	1
Complies with Duty to Cooperate	2	1

Summary of Representations

A respondent refers to the policy being well thought out whereas there is a request for the Policy to also refer to street signage such as direction signs, road signage and other highways, WCC or HCC signs.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/46/D10, **ANON-AQTS-32CD-5 – Colden Common Parish Council/26/D10**, ANON-AQTS-323A-J/3/D10

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

• Need for the policy to refer to street signage.

Sustainable Transport and Active Travel

Local Plan Reference or document	Policy T1 Sustainable and Active Transport and Travel		
Total Number of Represe	esentations received 38		38
Number of respondents consider the policy is –			No
Legally Compliant		27	3
Sound		17	15
Complies with Duty to C	ooperate	24	3

Summary of Representations

General support for the aim to reduce car dependency and promote active travel.

Representations refer to the inconsistencies with national guidelines and inadequate references to cycling and walking infrastructure and ambiguous/vague policy language with the need for more specific and measurable policies to meet carbon targets.

Concern that the concept of the 20-minute neighbourhood is not consistently applied across the plan in relation to site selection and nor is this applicable to the more rural areas of the district. There is support for co-locating homes with employment to reduce travel but concerns over inconsistent site selection and the spatial strategy that has been taken forward in the Local Plan.

Many comments refer to the fact that given the rural nature of the district, there will still be a reliance on car use and for this to change there needs to be substantial investment in public transport infrastructure.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BYS-T/1/T1, ANON-AQTS-3B8J-G/1/T1, ANON-AQTS-3BJD-V/5/T1, ANON-AQTS-3BPF-4/1/T1, ANON-AQTS-3BSY-T/63/T1, ANON-AQTS-32CD-5 - Colden Common Parish Council/37/T1, ANON-AQTS-32GC-8/10/T1, ANON-AQTS-32GG-C/9/T1, ANON-AQTS-32NS-Y/8/T1, ANON-AQTS-329Q-8/30/T1, ANON-AQTS-32UU-8/6/T1, ANON-AQTS-32G7-V/12/T1, ANON-AQTS-3BQA-Z/17/T1, ANON-AQTS-32TV-8/1/T1, ANON-AQTS-3BX4-T/10/T1, **ANON-**AQTS-32FT-R - New Alresford Town Council/8/T1, ANON-AQTS-32F2-P/3/T1, ANON-AQTS-32TW-9/6/T1, ANON-AQTS-32F7-U/1/T1, ANON-AQTS-32ND-G/2/T1, ANON-AQTS-32Z2-A/3/T1, ANON-AQTS-322X-8 - Upham Parish Council/2/T1, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/15/T1, ANON-AQTS-3B8M-K/10/T1, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/15/T1, BHLF-AQTS-326U-9 - Active Travel England/1/T1, BHLF-AQTS-32YH-Y - Network Rail/4/T1, BHLF-AQTS-328Y-F/9/T1, BHLF-AQTS-3289-F/5/T1, BHLF-AQTS-3288-E/5/T1, BHLF-AQTS-328Q-7/13/T1, BHLF-AQTS-328X-E/14/T1, BHLF-AQTS-3286-C/15/T1, BHLF-AQTS-3284-A/11/T1, BHLF-AQTS-328G-W/14/T1, BHLF-AQTS-328N-4/2/T1, BHLF-AQTS-328R-8 - Hampshire County Council/15/T1, BHLF-AQTS-32QF-N -National Highways/3/T1

Post Regulation 19 Actions

Proposed modifications to respond to representations from Network Rail (criterion v and vi of Policy T1) and Hampshire County Council (criterion iii of Policy T1).

- Application of 20 minute neighbourhoods in a rural district and its use in site selection;
- Continued/unavoidable reliance on the private car given lack of alternatives in rural areas;
- inadequate references to cycling and walking infrastructure; and
- policy needs clarity to avoid ambiguous/vague language to be able to be applied consistently.

Local Plan Reference or document	Park	ing for New De	Policy T2 evelopments
Total Number of Repres	entations received		16
Number of respondents who confirmed they Yes consider the policy is –			
Legally Compliant		11	5
Sound		6	11
Complies with Duty to C	ooperate	10	5

Concern about the approach to parking standards and sustainable transport objectives.

Respondents refer to the policy's flexibility in parking provision for new developments and that these might not adequately reflect the reality of car dependency, especially in areas of the district which lack public transport infrastructure and options for alternative sustainable travel solutions.

Concerns about the consequences of lack of parking in a new development in relation to increases in on-street parking, exacerbated congestion and safety issues in adjoining areas.

Request for clear, adaptable parking standards, the proposed abandonment of parking standards offers little clarity to developers or master planners designing a proposed development, particularly for schemes in rural areas where alternatives to car use are more limited.

Some respondents request that flexibility is built into the policy, to provide a balance between movement, necessity and placemaking. There is acknowledgement that even if a development is planned with little/no parking provision there is still the need for visitor parking and being able to deal with service vehicles.

Respondents refer to the need for alignment with national standards and the inclusion of guidelines to support active travel, as well as provisions for disabled parking and vehicle charging infrastructure.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/76/T2, ANON-AQTS-3BJD-V/8/T2, ANON-AQTS-3BSY-T/99/T2, ANON-AQTS-32CD-5 - Colden Common Parish Council/53/T2, ANON-AQTS-32GC-8/14/T2, ANON-AQTS-32NS-Y/12/T2, ANON-AQTS-32G7-V/18/T2, ANON-AQTS-32FT-R - New Alresford Town Council/11/T2, ANON-AQTS-32TW-9/9/T2, ANON-AQTS-32Z2-A/4/T2, ANON-AQTS-323A-J/9/T2, ANON-AQTS-3BB1-1/3/T2, ANON-AQTS-3B8M-K/18/T2, BHLF-AQTS-3284-A/21/T2, BHLF-AQTS-328R-8 - Hampshire County Council/34/T2, BHLF-AQTS-32QF-N - National Highways/4/T2

Post Regulation 19 ActionsNone

Main issues raised in representations received in regulation 19 consultation

- Need for a flexible policy which includes parking standards to give guidance to those designing new developments;
- Impact of lack of parking/under provision of parking in new developments in terms of congestion, safety and on street parking in adjoining areas; and
- Reality of lack of alternatives to the car in a rural area and the need for parking to be included in new developments.

Local Plan Reference	Policy T3		
or document	Enabling Sustainable Trave		
	the Design and I	₋ayout of Park	ing for New
		De	velopments
Total Number of Represe	resentations received 1		15
Number of respondents	who confirmed they	Yes	No
consider the policy is -	-		
Legally Compliant		11	2
Sound		7	7
Complies with Duty to C	ooperate	9	3

Summary of Representations

General agreement on the necessity for integrating sustainable travel initiatives, sympathetically tailored to local needs, but concern that this is not reflective of a rural district where there is high car dependency in the rural areas due to lack of alternatives.

Concern that the policy requirements are unlikely to be achievable for all types / scales of development to which the policy applies.

A number of responses express concern about the adequacy of the policy in addressing sustainability and carbon neutrality goals. Request for clearer policy language, with the need for precise definitions, regarding terms like "active and emobility travel, car clubs", and the need for parking standards for these forms of mobility.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/37/T3, ANON-AQTS-32CD-5 - Colden Common Parish Council/22/T3, ANON-AQTS-32NR-X/7/T3, ANON-AQTS-329Q-8/16/T3, ANON-AQTS-32Z2-A/2/T3, ANON-AQTS-323A-J/2/T3, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/8/T3, ANON-AQTS-3B8M-K/7/T3, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/8/T3, BHLF-AQTS-328X-E/9/T3, BHLF-AQTS-3286-C/9/T3, BHLF-AQTS-3284-A/9/T3, BHLF-AQTS-328G-W/9/T3, BHLF-AQTS-328R-8 - Hampshire County Council/10/T3, BHLF-AQTS-328K-1/8/T3

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Need clear definitions of terms used and what scale and locations of development the policy would be applied to given the rural nature of the district; and
- Policy lacks clarity in terms of addressing sustainability and carbon neutrality goals.

Local Plan Reference or document	Policy T4 Access for New Developments		
Total Number of Repres	resentations received 12		12
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		11	1
Sound		5	7
Complies with Duty to C	ooperate	9	2

Summary of Representations

The majority of comments suggest that Policy T4 needs more specific guidance on connecting new developments to public transport, cycling, and walking routes, including reference to LCWIP, plus emphasising support for active travel and accessibility for people with disabilities – the needs of those with reduced mobility must not be overlooked.

There is concern that the vague language and lack of alignment with national guidelines undermines equitable access to travel options. Sustainable and active travel is encouraged, but feedback highlights a need for a site access to be designed to be appropriate for the type, scale and location of the development.

Development and infrastructure challenges are referred to by a number of respondents in terms of narrow footpaths and old infrastructure, which raises issues of accessibility and policy consistency. Comments in relation to safety and environmental considerations stress the importance of clear guidance and designing developments for safe, convenient, and sustainable access, with collaborative efforts to reduce carbon footprints and improve active travel routes.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/23/T4, ANON-AQTS-3BJD-V/2/T4, ANON-AQTS-3BSY-T/34/T4, ANON-AQTS-3BFT-8 - Crawley Parish Council/5/T4, ANON-AQTS-32CD-5 - Colden Common Parish Council/20/T4, ANON-AQTS-329Q-8/14/T4, ANON-AQTS-32G7-V/6/T4, ANON-AQTS-32TW-9/2/T4, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/6/T4, ANON-AQTS-3B8M-K/5/T4, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/6/T4, BHLF-AQTS-3284-A/8/T4

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Policy needs greater clarity on connecting new developments to public transport, cycling, and walking routes and to be inclusive to all users;
- Need to reflect narrow pavement and old infrastructure in many locations which impacts accessibility; and
- Need clear guidance for designing developments for safe, convenient, and sustainable access as appropriate for the type, scale and location of the development.

Biodiversity and the Natural Environment

Local Plan Reference			Policy NE1
or document	Protecting and Enhancing Bi	•	
	E	nvironment ir	the District
Total Number of Repres	sentations received 30		30
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		25	1
Sound		11	15
Complies with Duty to C	Cooperate	23	2

Summary of Representations

90% of responses received support the overarching objective of the policy to protect and enhance the natural environment. Respondents suggest that the policy should reference the Hampshire Local Nature Recovery Strategy to ensure better biodiversity mapping and adopting an ecosystem services approach.

Some comments raise support for the objectives and policy in prioritising brownfield land, on site mitigation and compensation. 50% of responses express concern that the policy does not meet the requirement of local and national policies (NPPF) particularly in relation to biodiversity, flood management and landscape protection. Suggestions include incorporating valued landscapes into the policy criterion.

Concerns were raised in relation to providing further clarity and guidelines within the policy and supporting text, with recommendations for providing additional definitions in the glossary and additional text on the implementation of the policy. There were criticisms raised that the policy does not set adequate guidelines for developers to follow the mitigation hierarchy or engagement with local conservation projects. A key concern of respondents is the preservation and enhancement of accessible green spaces for health and recreation and the need to incorporate this within Policy NE1. Suggestions that there should be a requirement for suitable alternative natural green space when existing open space is developed on.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BR1-H/4/NE1, ANON-AQTS-3BEW-A - Littleton and Harestock
Parish Council/30/NE1, ANON-AQTS-3BRX-R/2/NE1, ANON-AQTS-3BSYT/43/NE1, ANON-AQTS-3BPG-5/1/NE1, ANON-AQTS-327N-3/1/NE1, ANON-

AQTS-3B5A-4/4/NE1, ANON-AQTS-3B54-Q/2/NE1, ANON-AQTS-32CD-5 - Colden Common Parish Council/25/NE1, ANON-AQTS-32UM-Z/4/NE1, ANON-AQTS-32UK-X - Environment Agency/12/NE1, ANON-AQTS-329Q-8/19/NE1, ANON-AQTS-3BQA-Z/8/NE1, ANON-AQTS-32FT-R - New Alresford Town Council/4/NE1, ANON-AQTS-32FC-7/1/NE1, ANON-AQTS-32FB-6/1/NE1, ANON-AQTS-322Q-1/1/NE1, ANON-AQTS-3224-4/1/NE1, ANON-AQTS-32ZE-W/1/NE1, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/9/NE1, ANON-AQTS-32N7-3 - Twyford Parish Council/1/NE1, BHLF-AQTS-3267-B/4/NE1, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/9/NE1, BHLF-AQTS-328Y-F/6/NE1, BHLF-AQTS-328Q-7/6/NE1, BHLF-AQTS-328Z-8 - Natural England/9/NE1, BHLF-AQTS-328M-3/2/NE1, BHLF-AQTS-328R-8 - Hampshire County Council/14/NE1, BHLF-AQTS-32QQ-Z/6/NE1

Post Regulation 19 Actions

Proposed modifications agreed with Historic England. Additional text added in criterion iv.

Proposed change agreed with Environment Agency in relation to criterion ii and paragraph 7.23.

Proposed modification agreed with Hampshire County Council in relation to criterion v.

Update to the Habitats Regulations Assessment to reflect representations made by Natural England.

- Overarching objectives of the policy supporting, including the prioritisation of brownfield land and the approach towards on site mitigation.
- Aligning the policy with National and Local policy requirements.
- Further clarity and guidelines within the policy and supporting text.
- Preservation and enhancement of accessible green spaces.
- Reference to the Local Natural Recovery Strategy and mitigation hierarchy.

Local Plan Reference	Policy NE2		
or document	Major Commercial, Educational and MOD		al and MOD
	Establishments in	the Countrysi	de (MTRA5)
Total Number of Repres	entations received		6
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		5	0
Sound		5	0
Complies with Duty to C	cooperate	5	0

There is widespread support for the policy focusing on promoting economic growth and job creation in the countryside. Some respondents highlight the contributions the policy can make to the local economy. Concerns have been raised about the requirement for site-wide masterplans. Comments were also made on ensuring local communities and stakeholders are involved in the application of the policy.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/23/NE2, ANON-AQTS-3BFT-8 – Crawley Parish
Council/4/NE2, ANON-AQTS-32CD-5 – Colden Common Parish
Council/16/NE2, ANON-AQTS-32NR-X/4/NE2, ANON-AQTS-32SB-K – Defence
Infrastructure Organisation/5/NE2, BHLF-AQTS-328K-1/5/NE2

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

- Support from the policy from respondents around the contribution to the economy and job creation.
- Some concern over the requirement for a site-wide masterplan and the engagement with local consultees in policy implementation.

Local Plan Reference or document	Open Spa	ace, Sport and	Policy NE3 Recreation
Total Number of Repres	entations received		18
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		13	2
Sound		9	7
Complies with Duty to C	ooperate	14	0

Summary of Representations

Support for the protection of open space, green areas and enabling development that delivers open space on site. Suggestions that a link should be provided in the policy between open space and health. There is a criticism that the policy does not address inadequate provision for open spaces and outdoor facilities within Winchester and this will result in a shortfall.

Concern that the policy does not set open space thresholds which align with national standards set out in the NPPF and 'Fields in Trust' guidance. There are also concerns that there are inconsistencies with planning concepts such as the 20-minute neighbourhood. Suggestions for the clarification of some terminology within the supporting text.

Criticism that the plan does not specifically identify a policy or account for sports and leisure provision within site allocations. Suggestions that the Open Space Assessment and Playing Pitch Strategy should be updated to unsure unmet

demands and sports and leisure provision are accounted for. Concern that where there is a loss of a facility is being proposed the policy does not advocate robust evidence to demonstrate the facility is no longer required.

Concern that where open space is provided in some settlements there will not be public transport available to access it. Suggestions for the removal of allotments from the policy and updates to the policy in terms of public access to open space where safeguarding is an issue.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BDP-2/2/NE3, ANON-AQTS-3BSY-T/6/NE3, ANON-AQTS-32CD-5
- Colden Common Parish Council/2/NE3, ANON-AQTS-329B-S/1/NE3, ANON-AQTS-32NR-X/1/NE3, ANON-AQTS-329Q-8/1/NE3, ANON-AQTS-32FT-R - New Alresford Town Council/1/NE3, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/1/NE3, ANON-AQTS-32ZS-B/1/NE3, ANON-AQTS-32ZM-5/1/NE3, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/1/NE3, BHLF-AQTS-328Y-F/1/NE3, BHLF-AQTS-3282-8 - Natural England/1/NE3, BHLF-AQTS-328X-E/1/NE3, BHLF-AQTS-3286-C/1/NE3, BHLF-AQTS-328G-W/1/NE3, BHLF-AQTS-328R-8 - Hampshire County Council/4/NE3, BHLF-AQTS-328K-1/1/NE3

Post Regulation 19 Actions

Proposed change to paragraph 7.28 to reflect comments by Hampshire County Council.

- Whether the policy will adequately address shortfalls in open space and sports facilities provision.
- Whether the provision for open space is in sustainable locations and where safeguarding is a consideration.
- Whether the policy aligns with relevant national standards and policy concepts.
- Clarification on supporting text terminology and additional information on the link between open space and health.

Local Plan Reference or document	Policy NE4 Green and Blue Infrastructure		
Total Number of Repres	entations received		16
Number of respondents consider the policy is –			
Legally Compliant		10	2
Sound		7	6
Complies with Duty to C	Cooperate	9	3
Summary of Representa	tions	-	

Overall support for the protection and enhancement of green and blue infrastructure. The majority of representations that refer to Policy NE4 relate to the implementation of the policy, particularly in relation to offsite financial contributions and the monitoring framework. 30% of respondents support the promotion of non-motorised travel with the policy. Suggestions that the Urban Green Factor should be made mandatory in the policy and that green infrastructure standards should be raised. Concern that the policy does not reference cross-border issues in relation to green infrastructure where relevant and engagement that has taken place between key stakeholders.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/49/NE4,
ANON-AQTS-3BSY-T/62/NE4, ANON-AQTS-32CD-5 - Colden Common Parish
Council/36/NE4, ANON-AQTS-329Z-H - South Downs National Park Authority
(SDNPA)/8/NE4, ANON-AQTS-32UK-X - Environment Agency/15/NE4, ANON-AQTS-32NR-X/9/NE4, ANON-AQTS-32G7-V/11/NE4, ANON-AQTS-32FT-R New Alresford Town Council/7/NE4, ANON-AQTS-32N7-3 - Twyford Parish
Council/2/NE4, BHLF-AQTS-32EK-E - Test Valley Borough Council/5/NE4,
BHLF-AQTS-328Q-7/12/NE4, BHLF-AQTS-3282-8 - Natural England/11/NE4,
BHLF-AQTS-3284-A/10/NE4, BHLF-AQTS-328K-1/13/NE4, BHLF-AQTS-32QY-8/8/NE4, BHLF-AQTS-32QQ-Z/9/NE4

Post Regulation 19 Actions

Proposed modification to paragraphs 7.32 and 7.34 agreed with Historic England.

Proposed change to paragraph 7.35 to be agreed with Natural England.

- Support for Policy NE4.
- Whether further details should be provided on the implementation of off-site financial contributions.
- Whether GI standards should be raised to align with other national standards.
- Whether the policy adequately referenced cross border issues or engagement that has taken place with other organisations.

Local Plan Reference or document		Policy NE5 Biodiversity
Total Number of Representations received		23
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	17	0
Sound	14	5
Complies with Duty to Cooperate	17	0

Support for reiterating the mandatory BNG requirements and protecting and enhancing sites of national and international importance. While there is support for this policy developers and other's question its feasibility and potential impact on development costs. Some respondents suggest that the mandatory 10% BNG requirement is increased. The Ministry of Defense have expressed the need for assessing off site BNG provision against statutory safeguarding zones.

There are concerns around the current monitoring framework for the policy and whether this will be effective in ensuring policy compliance. There are some concerns that the policy does not align with Para 180 of the NPPF and there are suggestions that the policy should be amended to reflect this. Concerns over the policy requirements for the allocated sites such as viability. Some respondents suggest amalgamating policies NE1 and NE5 to ensure succinctness as there is come criticism that there is repetition.

Key stakeholders such as Test Valley Borough Council and Portsmouth City Council support the collaborative approach made by the Council in relation to enhancing biodiversity through measures such as the LNRS and mitigating recreational pressure on the Solent. Organisations such as Natural England have referenced the need for the policy to provide further clarification on compensatory habitats, recreational disturbance and the requirements for Functionally Linked Land in relation to designated sites.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BR1-H/2/NE5, ANON-AQTS-3BEW-A – Littleton and Harestock
Parish Council/20/NE5, ANON-AQTS-3BTT-P/1/NE5, ANON-AQTS-3BSYT/30/NE5, ANON-AQTS-32CD-5 – Colden Common Parish Council/19/NE5,
ANON-AQTS-32UM-Z/2/NE5, ANON-AQTS-329Q-8/12/NE5, ANON-AQTS-32UU8/2/NE5, ANON-AQTS-32U5-8/2/NE5, ANON-AQTS-3BQA-Z/6/NE5, ANONAQTS-32SB-K – Defence Infrastructure Organisation/6/NE5, ANON-AQTS32Z7-F – Hampshire Hospitals NHS Foundation Trust/4/NE5, BHLF-AQTS32EK-E – Test Valley Borough Council/3/NE5, BHLF-AQTS-326A-N/2/NE5,
BHLF-AQTS-3265-9 – Hampshire Hospitals NHS Foundation Trust/4/NE5,
BHLF-AQTS-32YM-4 – Defence Infrastructure Organisation/2/NE5, BHLFAQTS-3286-C/7/NE5, BHLF-AQTS-328G-W/7/NE5, BHLF-AQTS-328K-1/6/NE5,
BHLF-AQTS-32QY-8/4/NE5, BHLF-AQTS-32QQ-Z/4/NE5 BHLF-AQTS-32QQ-1 –
Portsmouth City Council/2/NE5

Post Regulation 19 Actions

Proposed change to criterion iv and paragraphs 7.44 and 7.45 to be agreed with Natural England.

- Support for mandatory BNG reference but some concerns around viability implications and whether the requirement should be increased.
- Support for collaborative working with neighbouring authorities on enhancing biodiversity and mitigating recreational pressure.
- Whether the policy framework for NE5 is effective

- Whether the policy provides sufficient clarity and whether it aligns with the NPPF.
- Whether further clarification is required for a number of issues linked to the policy such as functionally linked land and recreational pressure on designated sites.
- Whether the policy requirements are likely to have significant implications for the sites allocated in the Local Plan.

Local Plan Reference or document	Flooding, Flood Risk ar	nd the Water E	Policy NE6 Environment
Total Number of Represe	esentations received 11		11
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		7	2
Sound		4	5
Complies with Duty to C	ooperate	7	2

26% of respondents support the policy in relation to protecting natural habitats. Respondents criticise the lack of reference in the policy to the SFRA and the methodology in assessing flood risk in Winchester. Concern that the policy does not meet the requirements of the NPPF. There are also concerns that the policy does not provide enough clarity as currently drafted. The majority of responses highlight the need for SuDS across all developments. A number of responses stress the need to prevent surface water from connecting to the foul drainage network to reduce the risk of pollution. In addition, there is criticism in relation to the lack of reference to guidelines in relation to sustainable drainage principles such as the CIRIA guidance.

Respondents stress the need for the engagement between developers and infrastructure providers to address capacity constraints and ensure infrastructure supports sustainable development. Concern that the policy does not address a solution for surface water and sewerage flooding at Brambridge.

Recommendations from organisations such the Environment Agency in relation to the loss of floodplain storage capacity and flood flow routes.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/49/NE6, ANON-AQTS-327N-3/2/NE6, ANON-AQTS-32CD-5 - Colden Common Parish Council/28/NE6, ANON-AQTS-32UK-X - Environment Agency/13/NE6, ANON-AQTS-329Q-8/21/NE6, ANON-AQTS-3BQA-Z/11/NE6, ANON-AQTS-327U-A - Southern Water/20/NE6, ANON-AQTS-32FT-R - New Alresford Town Council/5/NE6, BHLF-AQTS-328Q-7/7/NE6, BHLF-AQTS-3282-8 - Natural England/10/NE6, ANON-AQTS-32NV-2 - Sparsholt Parish Council, BHLF-AQTS-32QQ-Z/7/NE6

Post Regulation 19 Actions

Proposed change to paragraph 7.55 as agreed with Southern Water.

Updated Statement of Common Ground with Southern Water to reflect Regulation 19 representations.

Proposed modification to supporting text to include new paragraph as agreed with Historic England.

Proposed modifications to criterion viii as agreed with the Environment Agency.

Main issues raised in representations received in regulation 19 consultation

- Whether the SFRA adequately assessed flood risk in Winchester.
- Whether the policy meets the NPPF and provides sufficiently clarity to ensure effective implementation.
- Whether the policy provides sufficient guidelines to sustainable drainage principles.
- Whether the policy should apply SuDS across all developments.
- Whether the policy addresses ongoing engagement with key organisations such as Southern Water.

Local Plan Reference or document	Settle	Policy NE7 ement Gaps
Total Number of Representations received		36
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	19	9
Sound	12	17
Complies with Duty to Cooperate	19	9

Summary of Representations

Support Policy NE7 and the inclusion of a gap between;

- Winchester and Littleton
- the 6000 dwelling development at Welborne (in the borough of Fareham) and the settlements of Wickham and Knowle
- Otterbourne-Southdown
- Kings Worthy, Headbourne Worthy and Abbotts Worthy
- Denmead and Waterlooville

Request for the policy to be deleted as it does not support the principle of meeting housing needs and the unmet needs of PfSH.

Request for a settlement gap between Olivers Battery/ Badger Farm Road to Compton/Hursley. Request from Sparsholt Parish Council for a settlement gap at Sparsholt.

Request for the Otterbourne-Southdown Gap to be removed, or reduced to only include the woodland east of Otterbourne Road. Request removal of Land at Pudding Farm could be removed from the Winchester – Kings Worthy/Headbourne Worthy Gap, without it having any material effect on the role of the Gap.

Object to the extent of the Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap, whilst promoting land at Mill Chase for development, the exclusion of the site from the gap will also maintain the generally open and undeveloped nature of the gap as a whole and avoid coalescence.

Respondents highlight that as Policy NE7 relates to settlement pattern it should not be classed as an Natural Environment Policy.

A respondent queries the legitimacy of settlement gaps as these are not advocated in NPPF or PPG. Particularly, that the purpose of gaps is to secure settlement separation and identity and not protecting the character and landscape of the area, therefore it appears more land has been included within gaps than is necessary, contrary to meeting housing needs and identifying land for development. The point of meeting housing needs is also raised by others who question whether such an approach remains necessary and justified, noting that it provides an additional layer of policy constraint against otherwise potentially sustainable development.

The concept of active travel is raised in some responses and there is a request for the policy to not preclude the creation of high-quality, well-surfaced, appropriatelylit active travel routes across the settlement gaps.

A respondent questions the rationale to carry forward gaps from the adopted local plan, when circumstances have changed in terms of housing need etc.

A respondent states that Policy NE7 lacks the same clear policy framework as adopted Policy CP18 (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.

Concern that the proposal for Sir John Moore Barracks which 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. On the basis that the land cannot perform both the function of a settlement gap and be allocated for development at the same time. The extent of the gap is to be determined through the master planning process for the site which is considered to be flawed and the gap should be determined first and enforced. 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.

A number of respondents refer to the Partnership of South Hampshire (PfSH) Policy Framework for Gaps, which refers to 'Gaps are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations.' The PfSH Framework seeks to avoid a 'proliferation of gaps' in South Hampshire, Policy NE7 promotes 9 gaps in Winchester District which appears to be creating 'a proliferation of gaps' in the south of the District.

With regard to the Welborne Gap some consider this land does not need to be in a settlement gap as it can be maintained undeveloped under two policies: namely Policy SP3 and Policy WK3 as Open Space and fails the criterion included in Policy NE7. An other respondent also refers to this gap and queries both its function and extent and references in the supporting text (para 7.60/7.64) in terms of the PfSH Spatial Position Statement, adoption of the Welborne Plan by Fareham Borough Council and the PfSH Designation for Gaps Guidance 2008, requesting the supporting text needs to be reviewed in the context that only Fareham BC can only plan for land in its area and not the extent of the gap in Winchester. It is incorrect to state that the settlement gap at Wickham and Knowle is designated to service the Welborne Garden Village – which is not the case. A further rep also questions why this gap was not subject of a review in the Settlement Gap Review Report (July 2024), others also take issue with the review as the scope of the purpose and assessment undertaken lacks clarity. Fareham BC support Policy NE7 and the retention of the settlement gaps (viii) Whiteley-Fareham/Fareham Western Wards (the Meon Gap) and (ix) Knowle, Wickham and Welborne.

Some representations refer to settlement gaps being of crucial importance in retaining the integrity of historic villages and should be retained to prevent urban spread and the destruction of the rural character of the land.

This policy should be supported by a map to make clear where these settlement gaps are.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/75/NE7, ANON-AQTS-3B6N-J/8/NE7, ANON-AQTS-3BSY-T/98/NE7, ANON-AQTS-3B44-P - Otterbourne Parish Council/3/NE7, ANON-AQTS-3278-D/5/NE7, ANON-AQTS-32CU-P/6/NE7, ANON-AQTS-3B5A-4/9/NE7, ANON-AQTS-3296-D/1/NE7, ANON-AQTS-32CD-5 - Colden Common Parish Council/52/NE7, ANON-AQTS-3299-G/18/NE7, ANON-AQTS-3BX6-V/6/NE7, ANON-AQTS-32UZ-D/5/NE7, ANON-AQTS-329E-V/6/NE7, ANON-AQTS-32U5-8/8/NE7, ANON-AQTS-32T1-3/2/NE7, ANON-AQTS-32G7-V/17/NE7, ANON-AQTS-32TQ-3/3/NE7, **ANON-**AQTS-32SB-K - Defence Infrastructure Organisation/10/NE7, ANON-AQTS-3BB1-1/2/NE7, ANON-AQTS-32N7-3 - Twyford Parish Council/4/NE7, BHLF-AQTS-32EE-8/4/NE7, BHLF-AQTS-32EY-V/8/NE7, BHLF-AQTS-32EK-E - Test Valley Borough Council/6/NE7, BHLF-AQTS-3267-B/11/NE7, BHLF-AQTS-3266-A - Fareham Borough Council/8/NE7, BHLF-AQTS-32Y5-C/1/NE7, BHLF-AQTS-32YJ-1/2/NE7, BHLF-AQTS-3288-E/8/NE7, BHLF-AQTS-328Q-7/18/NE7, BHLF-AQTS-3287-D/1/NE7, BHLF-AQTS-328W-D/6/NE7, BHLF-AQTS-3284-A/20/NE7, BHLF-AQTS-328G-W/20/NE7, BHLF-AQTS-328H-X/2/NE7, BHLF-AQTS-32QY-8/13/NE7, ANON-AQTS-32N-2 - Sparsholt Parish Council/1/NE7

Post Regulation 19 Actions

None.

- Requests for gaps to be deleted/amended/created to allow for development
- The need to clarify the role and function of settlement gaps in terms of achieving sustainable development and meeting housing needs and unmet needs

- Clarity in terms of the positioning of Policy NE7 in the Natural Environment section of the local plan rather than the Spatial Strategy
- · Legitimacy of defining gaps in context of NPPF
- Request for clear maps to define the extent of the gaps
- Specific reference to the Welborne Gap in the context of the adopted Welborne Plan and its function with settlements in Winchester District
- Seeking clarification as to why some gaps were <u>reviewed</u> and others not.
- Request for policy alternations to include reference to active travel and that such routes would be permissible through a defined gap

Local Plan Reference			Policy NE8
or document	So	outh Downs N	ational Park
Total Number of Represen	tations received		10
Number of respondents w consider the policy is –	ho confirmed they	Yes	No
Legally Compliant		7	1
Sound		4	5
Complies with Duty to Co	operate	8	0

Some representations support the policy.

Others request clearer policy wording, with regard to the ambiguity of terms like 'in close proximity,' which leads to inconsistencies with the National Planning Policy Framework (NPPF) para 182. Suggest this is replaced with 'the setting of' to better align with national guidelines. Respondents also emphasise the importance of defining policy aims clearly to enhance clarity and effectiveness. There is also a strong emphasis on ensuring developments respect and conserve the Park's unique qualities.

The additional paragraph included at the end of Policy NE8 should also be deleted as policy to protect National Parks is already set out in the NPPF.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B6N-J/2/NE8, ANON-AQTS-3BSY-T/60/NE8, ANON-AQTS-3BPH-6/6/NE8, ANON-AQTS-32CU-P/2/NE8, ANON-AQTS-32CD-5 - Colden Common Parish Council/34/NE8, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/7/NE8, ANON-AQTS-32N8-4 - Badger Farm Parish Council/1/NE8, ANON-AQTS-329Q-8/29/NE8, BHLF-AQTS-328K-1/12/NE8, BHLF-AQTS-32QZ-9/5/NE8

Post Regulation 19 Actions

Proposed modification to Policy NE8 and paragraphs 7.68, 7.69, 7.70, 7.71, 7.72 as agreed with the South Downs National Park Authority.

- The need to clarify terms used within the policy to ensure that the policy is effective and can be applied consistently.
- · Policy needs to align more with NPPF.

Local Plan Reference or document		Landscap	Policy NE9 e Character
Total Number of Represe	entations received		9
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		6	2
Sound		4	5
Complies with Duty to C	ooperate	7	1

Support is expressed for the policy and in particular references to the key management strategies outlined in the Landscape Character Assessment (LCA) and the protection of Fort Southwick and Fort Nelson.

Request that criterion vi) should include some flexibility such that where it is necessary to amend green or blue corridors to achieve greater sustainability benefits, then an appropriate scheme of compensation will be required, prioritising other opportunities for these corridors within the site.

Policy lacks protection for valued landscapes - the need to protect valued landscapes is recognised in proposed Policy NE1 paragraph 7.22 which states that that "Valued landscapesshould be protected and enhanced", following the wording of NPPF 180(a). However this recognition is not carried forward to the text of the Policy itself.

A respondent objects to the changes to the policy in the Reg 19 version of the local plan and inclusion of the requirement for 'A Landscape Visual Appraisal' (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development must be provided in order to assess potential harm to the character of the area'. The policy needs to identify which scale and type of development this is applicable to, as it is not proportionate to require all minor development proposals to provide a Landscape Visual Appraisal' (LVA) or a Landscape Visual Impact Assessment (LVIA).

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/6/NE9, ANON-AQTS-3BRX-R/1/NE9, ANON-AQTS-3BSY-T/11/NE9, ANON-AQTS-32CD-5 - Colden Common Parish Council/8/NE9, ANON-AQTS-329Q-8/4/NE9, ANON-AQTS-32G7-V/2/NE9, BHLF-AQTS-32EU-R - Hursley Parish Council/1/NE9, BHLF-AQTS-3267-B/2/NE9, BHLF-AQTS-328K-1/3/NE9, BHLF-AQTS-32Q2-1 - Portsmouth City Council/3/NE9

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Need to clarify policy to be proportionate to different scales and forms of development
- Policy lacks flexibility in terms of green or blue corridors and the need for these to be adjusted to allow for other benefits.
- Policy should reflect valued landscapes

Local Plan Reference or document	Policy NE10 Protecting Open Areas	
Total Number of Representations received		10
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	3
Sound	4	6
Complies with Duty to Cooperate	7	1

Summary of Representations

Criticism for the lack of designation of Local Green Spaces (LGS), as various sites have been suggested by local communities. Respondents express concern that the policy does not meet the requirements of the NPPF, and that a number of spaces have been suggested to be designated as LGS to be included in the local plan and shown on the policies map.

Concern in regard to the proposed loss of open areas which are valuable for biodiversity, heritage and recreation.

The County Council consider it crucial to recognise the ability for school playing fields to be disposed of for alternative uses as a policy exception - to be able to secure funding for recreational and education improvements - or used to accommodate school expansions.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BDP-2/4/NE10, ANON-AQTS-3BR1-H/5/NE10, ANON-AQTS3BSY-T/71/NE10, ANON-AQTS-3B52-N/1/NE10, ANON-AQTS-3BBZ-A/1/NE10,
ANON-AQTS-32CD-5 - Colden Common Parish Council/41/NE10, ANON-AQTS-32NK-Q/1/NE10, ANON-AQTS-32ZS-B/5/NE10, BHLF-AQTS-328R-8 - Hampshire County Council/21/NE10, BHLF-AQTS-328K-1/14/NE10

Post Regulation 19 Actions

Proposed modification to include new supporting paragraph 7.82 as agreed with Hampshire County Council.

Main issues raised in representations received in regulation 19 consultation

Need to retain open areas that have biodiversity, heritage and recreational importance

- Lack of flexibility to allow for the disposal of school playing fields as an exception
- Lack of designation of Local Green Spaces as suggested by various local communities.

Local Plan Reference or document	Policy NE11 Open Space Provision for New Developments		
Total Number of Repres	esentations received 8		
Number of respondents consider the policy is –	mber of respondents who confirmed they		No
Legally Compliant		7	1
Sound		4	4
Complies with Duty to C	ooperate	8	0

Respondents raise concerns regarding the effectiveness and compliance of Policy NE11. 62% of responses have suggested that Policy NE11 is integrated into Policy NE3 to ensure shortfalls of open space and sports facilities are addressed. There are concerns that the policy is insufficient in addressing existing deficits, and respondents suggest there is a need for site allocations to contribute to these through on site provision or off site contributions. 50% of the responses provide comments on the policy to improve clarity and effectiveness. There is support for the addition to the policy to reflect the need to provide open space for specialist housing for older people.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/27/NE11, ANON-AQTS-3B44-P - Otterbourne Parish Council/2/NE11, ANON-AQTS-32CD-5 - Colden Common Parish Council/17/NE11, ANON-AQTS-3274-9/2/NE11, ANON-AQTS-32ZS-B/4/NE11, BHLF-AQTS-328X-E/5/NE11, BHLF-AQTS-3286-C/5/NE11, BHLF-AQTS-328G-W/5/NE11

Post Regulation 19 Actions

None

- Comments that NE11 should be integrated and amalgamated as one policy for open space under Policy NE3.
- Whether the policy addresses existing open space deficits.
- Whether sites allocated in the Plan should provide on site provision or off site contributions.
- Support for the inclusion of specialist housing for older people in the policy.

Local Plan Reference	Policy	/ NE12

or document	Equestrian Development		
Total Number of Repres	entations received		2
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		2	0
Sound		2	0
Complies with Duty to C	ooperate	2	0

Support for the policy.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/1/NE12, ANON-AQTS-32CD-5 - Colden Common Parish
Council/1/NE12

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation None

Local Plan Reference or document	Policy NE13 Leasure and Recreation in the Countryside		
Total Number of Repres	esentations received 5		
Number of respondents consider the policy is –	dents who confirmed they Yes		No
Legally Compliant		4	1
Sound		2	3
Complies with Duty to C	ooperate	4	0

Summary of Representations

Areas for sport and recreation should not be used for development.

Whilst the policy allows for the development of new leisure and recreational facilities outside of defined settlement boundaries where a countryside location is necessary, this approach is not echoed in the Strategic Policy SP3. The policy also does not align with the principles of active travel and should refer to the need for facilities to demonstrate active travel access.

The plan lacks policies in relation to sport or leisure facilities despite the clear strategic objective of healthy, prosperous communities contrary to NPPF.

Request that the policy also refers to enabling development to allow for investment in new or enhanced facilities on the host site. There should also be reference to recreational public access in terms of rivers and watercourses and the benefits this can bring to both health and well being.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/100/NE13, **ANON-AQTS-32CD-5 - Colden Common Parish Council/54/NE13**, ANON-AQTS-32F2-P/8/NE13, BHLF-AQTS-328Y-F/13/NE13, BHLF-AQTS-3284-A/22/NE13

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Lack of alignment with Policy SP3 Development in the Countryside
- Lack of reference to active travel to access sites
- Clarify the role of enabling development.

Local Plan Reference or document	Policy NE14 Rural Character	
Total Number of Representations received		7
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	1
Sound	3	4
Complies with Duty to Cooperate	5	2

Summary of Representations

Support for the policy.

General concern that developments should have no impact on the rural environment, with particular reference to traffic impacts on narrow rural roads and that any assessments need to look beyond the site boundaries and take into consideration cumulative impacts to determine the true traffic impacts. Respondents suggest that the policy therefore contradicts Policy T1 and undermines the transport policies especially where rural roads that are recognised – or identified in the district LCWIP - as being part of rural active travel routes.

Clarification is needed to allow for appropriate highways alterations that facilitate sustainable rural development without harming the overall rural character. Respondents suggest that as drafted, the wording can be interpreted such that any alteration to a rural highway is unacceptable, which is clearly unreasonable.

Specific request to remove the sites allocated for development in the local plan from the countryside and for settlement boundaries to be amended.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/12/NE14,
ANON-AQTS-3BSY-T/18/NE14, ANON-AQTS-3BFT-8 - Crawley Parish
Council/3/NE14, ANON-AQTS-32CD-5 - Colden Common Parish
Council/12/NE14, ANON-AQTS-32G7-V/3/NE14, ANON-AQTS-32SB-K Defence Infrastructure Organisation/3/NE14, BHLF-AQTS-3284-A/4/NE14

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Contradiction with Policy T1 and the Plans' aim for active travel
- Recognition that not all highway alterations may be unacceptable
- The need for traffic assessments to look more holistically at the local area and cumulative impacts of recent developments.

Local Plan Reference	Policy NE15 Special Trees, Important Hedgerows and Ancient		
or document			
			Woodlands
Total Number of Repres	entations received		6
Number of respondents	who confirmed they	Yes	No
consider the policy is -			
Legally Compliant		6	0
Sound		4	2
Complies with Duty to C	Sooperate	6	0

Summary of Representations

67% of respondents support the policies focusing on environmental protection and the addition of the 15m buffer. Suggestions for a larger buffer area to protect tree root zones. Concerns arise about inconsistencies with national policies due to references to "exceptional circumstances" within the policy, suggesting a need for clearer definitions and policy criteria. Suggestions that any removal of trees should follow strict guidelines and ensure proper replacement.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/19/NE15, ANON-AQTS-32CD-5 - Colden Common Parish
Council/14/NE15, ANON-AQTS-329Q-8/9/NE15, ANON-AQTS-32SB-K Defence Infrastructure Organisation/4/NE15, ANON-AQTS-32ZM-5/2/NE15,
BHLF-AQTS-3282-8 - Natural England/5/NE15

Post Regulation 19 Actions

None

- Whether the policy goes beyond the requirements of the NPPF.
- Whether a large buffer is required to accommodate root protection zones.
- Whether the policy criteria should be strengthened to include guidelines for tree removal and replacement.

Local Plan Reference	Policy NE16
or document	

Nutrient Neutrality Water Quality Effects on the Special
Protection Areas (SPAs), Special Areas of Conservation
(SACs) and Ramsar Sites of the Solent and The River
Itchen

Total Number of Representations received		8
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	7	1
Sound	4	3
Complies with Duty to Cooperate	7	0

Support from organisations such as Natural England for the delivery of nature-based solutions. Support from authorities such as Portsmouth City Council in relation to delivering a sustainable supply of nutrient mitigation. 88% of respondents are concerned over the uncertainty of the Habitats Regulations in light of current case law (CJ Fry). Respondents suggest that 'overnight developments' are specifically referenced in the policy to ensure clarity.

Organisations such as Natural England support the policy but have suggested amendments for clarity. There is concern over the reliance on strategic mitigation solutions where there is a need from other local authorities within the same catchment. Some concerns over the sewage issues and flooding in Colden Common. Suggestions that the policy wording should include reference to the relevant legislation available at the time such as the LURA. Current lack of clarity on how the Council can assist developers with nutrient mitigation solutions. Comments from respondents on ensuring the LPA continues to encourage developers to agree nutrient solutions with Natural England.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/74/NE16, ANON-AQTS-3BPH-6/7/NE16, ANON-AQTS32CD-5 - Colden Common Parish Council/42/NE16, ANON-AQTS-329Q8/34/NE16, ANON-AQTS-3BQA-Z/19/NE16, BHLF-AQTS-326X-C - New Forest
District Council/2/NE16, BHLF-AQTS-3282-8 - Natural England/13/NE16,
BHLF-AQTS-328K-1/16/NE16, BHLF-AQTS-32Q2-1 - Portsmouth City
Council/4/NE16

Post Regulation 19 Actions

Proposed modification to paragraphs 7.112, 7.115 to be agreed with Natural England.

- Whether the policy should reference 'overnight development' to ensure correct application.
- Whether the policy should reference to the relevant case law and legislation available at the time.
- Lack of clarity in relation to strategic nutrient mitigation solutions available to developers.
- Concern over the treatment of sewerage issues at Colden Common.

Local Plan Reference or document	Policy NE17 Rivers, Watercourses and their Settings		
Total Number of Represe	entations received		4
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		3	1
Sound		3	1
Complies with Duty to C	ooperate	3	1

Some support for the policy in relation to recognising the important of rivers, watercourses and chalk streams. Suggesting that the policy should recognise natural buffer zones between developments and rivers/watercourses. Some concerns over the sewage issues and flooding in Colden Common. Concern that the policy does not adequately reflect the requirements of the Solent Wader and Brent Geese Strategy (SWBGS).

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/15/NE17, ANON-AQTS-32CD-5 - Colden Common Parish
Council/9/NE17, ANON-AQTS-32UK-X - Environment Agency/5/NE17, BHLF-AQTS-3282-8 - Natural England/4/NE17

Post Regulation 19 Actions

Proposed modifications to Policy NE17 and paragraph 7.118 to be agreed with Natural England.

Proposed modification to include new policy criterion vii. and new paragraph in the supporting text agreed with the Environment Agency.

Main issues raised in representations received in regulation 19 consultation

- Whether buffer zones should be reflected within the policy.
- Whether the policy adequately reflects the SWBGS.

The Historic Environment

Local Plan Reference or document	Policy HE1 Historic Environmen		Policy HE1 Environment
Total Number of Representati	ons received		5
Number of respondents who consider the policy is –			No
Legally Compliant		4	0
Sound		3	1

Complies with Duty to Cooperate

4

0

Summary of Representations

A number of representations support this policy.

Other representations refer to the need to retain and preserve distinct heritage qualities, such as boundaries and features against development pressures, to ensure each settlement/parish retains its own unique qualities

The policy needs to allow for the upgrading of heritage buildings with modern technology to also achieve desired energy efficiency/net carbon zero aspirations to allow them a meaningful future and whilst retaining historic context, such adaptations should not be seen as inappropriate or made unaffordable by the needs of historic conservation.

Overall, the responses reflect the need for flexible heritage policies that align historical preservation with contemporary and future needs.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BTZ-V - Bishop's Sutton Parish Council/2/HE1, ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/53/HE1, ANON-AQTS-3BSY-T/67/HE1, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation
Trust/17/HE1, ANON-BHLF-AQTS-3265-9 - Hampshire Hospitals NHS
Foundation Trust/17/HE1

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Need for practical policies that allow meaningful, sustainable use of historic buildings without imposing economic strains; and
- Flexibility for sustainable, climate-conscious upgrades, and installation of modern, high-tech infrastructure.

Local Plan Reference	Policy HE2 All Heritage Assets (both designated and non-		
or document			
			designated)
Total Number of Repres	entations received		5
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		4	0
Sound		3	1
Complies with Duty to C	Cooperate	4	0
O	41	•	

Summary of Representations

A number of representations support this policy.

Respondents emphasise the necessity for clarity and consistency in policy wording to avoid misinterpretation, notably in relation to the setting of a heritage asset and its significance and for alignment with the NPPF.

The policy needs to provide for flexibility and adaptability to meet modern needs, particularly in upholding energy efficiency and Net Carbon Zero targets, without compromising on historical preservation or rendering upgrades financially prohibitive.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/32/HE2,
ANON-AQTS-3BSY-T/45/HE2, ANON-AQTS-3BQA-Z/10/HE2, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/10/HE2, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/10/HE2

Post Regulation 19 Actions

Proposed modifications to Policy HE2 in response to comments from Historic England, after a post Regulation 19 meeting between the Council and Historic England.

Proposed modification agreed with Historic England in response to the wording of paragraph 8.4.

Main issues raised in representations received in regulation 19 consultation

- Need for clarity in policy expression in relation to its setting to ensure a consistent approach and interpretation; and
- Flexibility for sustainable, climate-conscious upgrades, and installation of modern, high-tech infrastructure.

Local Plan Reference or document	Policy HE3 Designated Heritage Assets		
Total Number of Represe	ntations received		3
Number of respondents v	who confirmed they	Yes	No
Legally Compliant		3	0
Sound		3	0
Complies with Duty to Co	ooperate	3	0

Summary of Representations

Support for the policy.

Concern about repetitiveness and overlap with national policies, indicating a need for simplification to make the policy more effective.

Representation Numbers (Statutory consultees in bold and named) **ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/66/HE3**, ANON-AQTS-3BSY-T/87/HE3, ANON-AQTS-3BQA-Z/20/HE3

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

Overlap and repetition with national policies.

Local Plan Reference or document	N	lon-de	signated Heri	Policy HE4 tage Assets
Total Number of Repres	entations received			5
Number of respondents consider the policy is –	who confirmed they		Yes	No
Legally Compliant			4	1
Sound			3	2
Complies with Duty to C	ooperate		5	0

Summary of Representations

Some question whether the policy is needed due to overlap with NPPF, whilst others support a policy to conserve non-designated heritage assets. Some see local lists as being crucial. This is in terms of empowering local authorities to protect locally significant yet non-designated heritage structures effectively and improve conservation outcomes for unlisted buildings and safeguarding features of historical or architectural importance and accordingly request that the policy retains the aspiration of preparing a list of non-designated heritage assets.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/31/HE4, ANON-AQTS-3BSY-T/44/HE4, ANON-AQTS-329Q-8/20/HE4, ANON-AQTS-3BQA-Z/9/HE4, BHLF-AQTS-326P-4/4/HE4

Post Regulation 19 Actions

None

- Overlap of policy with NPPF;
- The need to retain the aspiration to prepare a local list given the value of local lists to protect unlisted, significant buildings.

Local Plan Reference	Policy HE5		
or document	Protecting the Significance of Heritage Assets		
	(designated and non-designated heritage assets) and		assets) and
	Miti	gating Unavo	idable Harm
Total Number of Repres	entations received		6
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		4	1

Sound	3	3
Complies with Duty to Cooperate	5	0

There are concerns that Policy HE5 unnecessarily duplicates the National Planning Policy Framework (NPPF).

The policy applies the same level of control to both designated heritage assets (irrespective of their status) and to non designated heritage assets.

The policy requires excessive recording which should be proportionate to the asset's importance.

The policy is unclear and inconsistent, especially concerning archaeology and historic buildings, and should be refined to provide appropriate mitigation based on the asset's value.

Representation Numbers (Statutory consultees in bold and named) **ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/43/HE5**, ANON-AQTS-3BSY-T/56/HE5, ANON-AQTS-329Q-8/25/HE5, ANON-AQTS-3BQA-Z/15/HE5, ANON-AQTS-32MQ-V/4/HE5, BHLF-AQTS-328K-1/11/HE5

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Policy is unclear and inconsistent and should be refined to provide appropriate/proportionate evaluation/mitigation based on the asset's value
- Repetition with national policy; and
- Needs to be more distinction to the approach for designated vs nondesignated assets.

Local Plan Reference	Policy HE6		
or document	Scheduled Monuments and Nationally Important Non-		
		Design	ated Assets
Total Number of Repres	resentations received		5
Number of respondents	who confirmed they	Yes	No
consider the policy is -			
Legally Compliant		3	0
Sound		2	2
Complies with Duty to C	Cooperate	3	0

Summary of Representations

Support for policy.

Policy needs clarity in differentiating between designated and non-designated assets. Stakeholders, including Winchester College and Historic England, point out the ambiguity in application criteria and call for clear guidelines on determining national importance for non-designated heritage assets. The need to separate and

prioritise actions for avoiding harm versus minimising it is emphasised. Furthermore, clarity is sought on involving Historic England, specifically when Scheduled Monuments are concerned. One respondent queried who determines the national importance of non-designated assets.

Another respondent supported the the protection of these heritage assets and the evidence required as part of an application that has the potential to impact a scheduled monument (Portsdown Hill).

In summary there is a need for clearer definitions and distinctions within Policy HE6 to ensure effective and consistent application.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/58/HE6, ANON-AQTS-3BSY-T/73/HE6, ANON-AQTS-32U8-B - Historic England/6/HE6, BHLF-AQTS-328K-1/15/HE6, BHLF-AQTS-32Q2-1/5/HE6 - Portsmouth City Council.

Post Regulation 19 Actions

Proposed modifications agreed in response to the matters raised by Historic England (Title of Policy HE6 and the wording of Policy HE6).

Main issues raised in representations received in regulation 19 consultation

- Need for clarity in differentiating between designated and non-designated archaeological assets;
- Need for clearer distinctions within Policy HE6 to ensure it is effective and can be applied consistently in relation to avoidance and minimization of harm; and
- Support for the policy.

Local Plan Reference or document	Policy HE7 Non-designated Archaeological Assets		
Total Number of Repres	esentations received 3		
Number of respondents consider the policy is –	ndents who confirmed they Yes No		
Legally Compliant		3	0
Sound		2	1
Complies with Duty to C	Sooperate	3	0

Summary of Representations

The policy has been well-received overall. There is concern about the repetitive nature of the text referring to development impacting archaeological sites. Policy needs to clearer and more concise to enhance its understanding and effectiveness.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/9/HE7, ANON-AQTS-3BSY-T/14/HE7, ANON-AQTS-329Q-8/6/HE7

Post Regulation 19 Actions

Proposed modifications agreed in response to the matters raised by Historic England (deleting text and the wording of Policy HE7).

Main issues raised in representations received in regulation 19 consultation

Policy lacks clarity and is repetitive.

Local Plan Reference or document	Policy HE8 Applications Affecting Listed Buildings		
Total Number of Repres	resentations received 3		
Number of respondents who confirmed they consider the policy is – No			No
Legally Compliant		2	0
Sound		1	1
Complies with Duty to C	ooperate	2	0

Summary of Representations

Concern in relation to the challenge of balancing the preservation of heritage buildings with the need for modernisation. There is a need to enable historical structures to remain functional through the integration of up-to-date technology and infrastructure, ensuring they contribute to energy efficiency goals such as achieving Net Carbon Zero. There is support for policies that advocate a flexible and modern approach to heritage asset management. Concern the policy stifles the adaptation of historic buildings to become more energy-efficient and sustainable. There should also be a balance between preservation and financial viability.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/32/HE8, ANON-AQTS-32Z7-F - Hampshire Hospitals
NHS Foundation Trust/5/HE8, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS
Foundation Trust/5/HE8

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

 Challenge of balancing the preservation of heritage buildings with the need for modernisation, energy efficiency and financial viability.

Local Plan Reference	Policy HE9
or document	Change of Use to Listed Buildings

Total Number of Representations received		3
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	0
Sound	1	1
Complies with Duty to Cooperate	2	0

Comments focus on balancing heritage conservation with modern needs, ensuring buildings remain functional and economically viable. Request for flexibility that allows the integration of energy-efficient and modern technological solutions without compromising historical contexts or prohibitive costs.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/25/HE9, ANON-AQTS-32Z7-F - Hampshire Hospitals
NHS Foundation Trust/3/HE9, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS
Foundation Trust/3/HE9

Post Regulation 19 Actions None

Main issues raised in representations received in regulation 19 consultation

 Challenge of balancing the preservation of heritage buildings with the need for modernisation, energy efficiency and financial viability.

Local Plan Reference or document	Policy HE10 Development in Conservation Areas		
Total Number of Repres	resentations received 3		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		2	0
Sound		2	1
Complies with Duty to C	ooperate	2	0

Summary of Representations

There is concern that it may not be possible to incorporate energy efficiency or energy generation measures into the design of the proposals without causing harm to the character and appearance of the area or the significance of a listed building.

A response notes difficulties in applying the policy in terms of application of each criteria to both new developments vs alterations/extensions.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/29/HE10,
ANON-AQTS-3BSY-T/42/HE10, BHLF-AQTS-328K-1/9/HE10

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Balance between historical preservation and environmental sustainability;
 and
- Policy clarity and implementation required particularly with regard to its application to new buildings vs extensions/alterations in conservation areas.

Local Plan Reference or document	Policy HE11 Demolition in Conservation Areas		
Total Number of Represe	resentations received 3		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		3	0
Sound		2	1
Complies with Duty to C	ooperate	3	0

Summary of Representations

Support for the policy.

The use of 'exceptional circumstances' is overly restrictive and does not relate to the circumstances in which the loss of unlisted buildings in conservation areas would actually be permitted. The issue is whether the loss will result in harm to the character and appearance of the conservation area, demonstration that a building is beyond repair and incapable of beneficial use is a consideration, but not the only determinant.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/44/HE11,
ANON-AQTS-3BSY-T/57/HE11, ANON-AQTS-329Q-8/26/HE11

Post Regulation 19 Actions

Minor modification in response to comments from Historic England.

- Criteria is considered to be too restrictive; and
- Need clarity within the policy text and alignment with heritage guidelines to ensure the policy is understood and can be consistently applied.

Local Plan Reference	Policy HE12

or document	Registered Historic Parks and Gardens		
Total Number of Repres	sentations received		2
Number of respondents consider the policy is –	_	Yes	No
Legally Compliant		2	0
Sound		1	1
Complies with Duty to 0	Cooperate	2	0
	4.	•	

Policy HE12 underestimates the importance of RPGs by suggesting they hold only local significance, amendments are encouraged to reflect their broader importance, indicating their national or even international value in addition to their local relevance.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/69/HE12, **ANON-AQTS-32U8-B – Historic England/5/HE12**

Post Regulation 19 Actions

Proposed modification agreed in response to comments from Historic England (Title of the policy and the wording of Policy HE12).

Main issues raised in representations received in regulation 19 consultation

• Clarify policy to reflect the status/value of parks and gardens.

Local Plan Reference			Policy HE13
or document	Non-designated Historic Rural and Industrial Heritage		
			Assets
Total Number of Repres	entations received		2
_			
N	. 6 . 141		

Number of respondents who confirmed they	Yes	No
consider the policy is -		
Legally Compliant	2	0
Sound	2	0
Complies with Duty to Cooperate	2	0

Summary of Representations

Policy is well thought out.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/88/HE13, ANON-AQTS-3BFT-8 - Crawley Parish Council/7/HE13

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

None

Local Plan Reference or document	Policy HE14 Improvements or Alterations to Improve the Energy		
Total Number of Repres	Efficiency of Historic Assets sentations received 4		4
-	spondents who confirmed they Yes		No
Legally Compliant 3		0	
Sound		1	2
Complies with Duty to C	ooperate	3	0

A key issue is ensuring that conservation rules do not hinder necessary upgrades and retrofitting, the policy should be in line with climate emergency goals, promoting modifications that lead to energy efficiency and Net Carbon Zero achievements. Clarity is needed on the intended functions of these heritage assets to better support modernisation efforts focused on energy efficiency. This is a need for clearer terminology and guidance in policies related to heritage buildings.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/47/HE14, ANON-AQTS-32U8-B - Historic
England/2/HE14, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS
Foundation Trust/11/HE14, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS
Foundation Trust/11/HE14]

Post Regulation 19 Actions

Proposed modifications agreed to Title of the Policy and criterion i in response to comments from Historic England.

Main issues raised in representations received in regulation 19 consultation

- Challenge of the requirement to achieve a balance between historical preservation and environmental sustainability; and
- Need for policy clarity to enable consistent implementation.

Homes for All

Local Plan Reference or document	Policy H1 Housing Provision		
Total Number of Repres	entations received		64
Number of respondents consider the policy is –	who confirmed they	Yes	No

Legally Compliant	26	31
Sound	5	52
Complies with Duty to Cooperate	20	37

A large proportion of representations on policy H1 concern the Local Plan's housing requirement, with the majority being from development interests promoting a higher housing requirement and the allocation of various 'omission' sites. These typically challenge the adequacy of the proposed housing numbers, particularly considering the draft changes to the National Planning Policy Framework, suggesting the plan relies on outdated data which does not adequately consider future government policy, or makes insufficient provision for the unmet housing needs of other authorities. Many development interests call for increased housing provision to better address neighbouring authorities' unmet housing needs and affordability issues, for the Local Plan period to begin in 2024, and for the housing target to be expressed as a minimum. Other comments are generally supportive, particularly those from other local authorities, or highlight the need for sustainable development, respecting environmental constraints, biodiversity and infrastructure capacity.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BTS-N - East Hampshire District Council/1/H1, ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/18/H1, ANON-AQTS-3BSY-T/28/H1. ANON-AQTS-3B8W-W/1/H1. ANON-AQTS-3272-7/1/H1. ANON-AQTS-3291-8/2/H1, ANON-AQTS-3292-9/1/H1, ANON-AQTS-3B5A-4/3/H1, ANON-AQTS-32CD-5 - Colden Common Parish Council/18/H1, ANON-AQTS-32GC-8/4/H1, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/6/H1, ANON-AQTS-3299-G/6/H1, ANON-AQTS-32GG-C/4/H1, ANON-AQTS-32UE-R/1/H1, ANON-AQTS-32UC-P/1/H1, ANON-AQTS-329R-9/2/H1, ANON-AQTS-32UJ-W/1/H1, ANON-AQTS-32N1-W/1/H1, ANON-AQTS-329E-V/2/H1. ANON-AQTS-32NS-Y/3/H1. ANON-AQTS-329U-C/2/H1. ANON-AQTS-3B5G-A/2/H1, ANON-AQTS-329Q-8/11/H1, ANON-AQTS-3274-9/3/H1, ANON-AQTS-32G7-V/5/H1, ANON-AQTS-32SJ-U/4/H1, ANON-AQTS-32TT-6/1/H1, ANON-AQTS-32T9-B/1/H1, ANON-AQTS-3BQA-Z/5/H1, ANON-AQTS-32TA-K/1/H1, ANON-AQTS-32T7-9/4/H1, ANON-AQTS-3BPV-M/1/H1, ANON-AQTS-32TQ-3/1/H1, ANON-AQTS-32TM-Y/1/H1, ANON-AQTS-32TE-Q/1/H1, ANON-AQTS-3BX4-T/4/H1, ANON-AQTS-3BBP-Z/5/H1, ANON-AQTS-327B-Q/5/H1, ANON-AQTS-322T-4/2/H1, ANON-AQTS-32MY-4/3/H1, ANON-AQTS-32MT-Y/1/H1. BHLF-AQTS-32EY-V/3/H1. BHLF-AQTS-32ED-7/2/H1. BHLF-AQTS-32EK-E - Test Valley Borough Council/2/H1, BHLF-AQTS-32EJ-D/2/H1, BHLF-AQTS-326Y-D/2/H1, BHLF-AQTS-3267-B/3/H1, BHLF-AQTS-326A-N/1/H1, BHLF-AQTS-326X-C - New Forest District Council/1/H1, BHLF-AQTS-3266-A -Fareham Borough Council/4/H1, BHLF-AQTS-328Y-F/3/H1, BHLF-AQTS-3289-F/2/H1, BHLF-AQTS-3288-E/1/H1, BHLF-AQTS-328Q-7/5/H1, BHLF-AQTS-328A-Q/2/H1, BHLF-AQTS-328V-C/2/H1, BHLF-AQTS-328X-E/6/H1, BHLF-AQTS-3286-C/6/H1, BHLF-AQTS-328G-W/6/H1, BHLF-AQTS-32QF-N - National Highways/1/H1, BHLF-AQTS-32QE-M/2/H1, BHLF-AQTS-32QY-8/2/H1, BHLF-AQTS-32QZ-9/2/H1, BHLF-AQTS-32QC-J/1/H1

Post Regulation 19 Actions

- Updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council have been agreed and published (October 2024);
- Consequential changes to Local Plan Table 2 (page 216) to reflect the approach agreed in the updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council are included in the Proposed Modifications (November 2024);
- A Housing Topic Paper Update will be produced to address some key issues arising from the consultation, particularly the proposed changes to the NPPF, the Plan period, the derivation of the unmet housing need figure, updated housing land supply information, and details of the housing trajectory and 5-year land supply (to be published following submission of the Local Plan).

- Whether the Local Plan accords with Government policy, including the existing and draft modified NPPF;
- Whether the Local Plan housing requirement is appropriate, including the 'unmet needs allowance', taking account of affordability, consideration of reasonable alternatives, etc;
- Whether the Plan period is appropriate, including the start date and inclusion of past 'over-delivery';
- Whether the expected sources of housing supply / trajectory are likely to be achieved, including the windfall allowance, existing commitments and new allocations;
- Whether the Plan's spatial distribution strategy is appropriate (more relevant to policies SP2 and H3);
- Whether the housing requirement should be expressed as a minimum requirement and whether there should be a policy committing to an early review of the Plan;
- The need for housing provision to be sustainable, protect environmental constraints and minimise the use of greenfield land; and
- Most neighbouring local planning authorities that responded consider the Plan is sound and legally compliant and support/note the 'unmet needs allowance'.

Local Plan Reference or document	Policy H2 Housing Phasing and Supply		
Total Number of Repres	entations received		48
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		14	26
Sound		2	43

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Summary of Representations

A large proportion of representations on policy H2 allege that the policy conflicts with the need to boost housing supply as outlined in the National Planning Policy Framework, with the majority being from development interests. This approach is claimed to be unsound and lacking flexibility, failing to address immediate market demands and housing needs. Respondents suggest that brownfield sites are often more complex and have longer timelines which could lead to delays in delivering them. Some also raise concerns about potential delays to the Local Plan strategic allocations, or other allocated/carried forward sites, leading to land availability issues. Respondents suggests concurrent development of both brownfield and greenfield sites is needed to ensure a timely and varied housing supply. Some respondents refer to the Plan's failure to provide a detailed housing delivery trajectory and suggest there are likely to be 5 year land supply issues as a result of the policy. Some respondents also highlight the Local Plan's downward housing provision trend, impacting the ability to help meet neighbouring areas' unmet needs, as well as local affordability.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/50/H2, ANON-AQTS-3B4C-5/3/H2, ANON-AQTS-3B8W-W/2/H2, ANON-AQTS-3272-7/2/H2, ANON-AQTS-3291-8/4/H2, ANON-AQTS-3292-9/2/H2, ANON-AQTS-3B5A-4/5/H2, ANON-AQTS-3B54-Q/3/H2, **ANON-**AQTS-32CD-5 - Colden Common Parish Council/29/H2, ANON-AQTS-32GC-8/6/H2, ANON-AQTS-3299-G/11/H2, ANON-AQTS-32GG-C/6/H2, ANON-AQTS-32UE-R/2/H2, ANON-AQTS-32UC-P/2/H2, ANON-AQTS-329R-9/3/H2, ANON-AQTS-32N1-W/2/H2, ANON-AQTS-329E-V/3/H2, ANON-AQTS-32NS-Y/5/H2, ANON-AQTS-32NP-V/1/H2, ANON-AQTS-329Q-8/22/H2, **ANON-AQTS-32NB-E -**Havant Borough Council/1/H2, ANON-AQTS-32G7-V/8/H2, ANON-AQTS-32SJ-U/7/H2, ANON-AQTS-3BQA-Z/12/H2, ANON-AQTS-32T7-9/7/H2, ANON-AQTS-3BX4-T/6/H2, ANON-AQTS-322T-4/3/H2, ANON-AQTS-322Q-1/2/H2, ANON-AQTS-32MY-4/4/H2, BHLF-AQTS-32EY-V/4/H2, BHLF-AQTS-3263-7/1/H2, BHLF-AQTS-3267-B/5/H2, BHLF-AQTS-326G-U/1/H2, BHLF-AQTS-328Y-F/7/H2, BHLF-AQTS-3289-F/3/H2, BHLF-AQTS-3288-E/3/H2, BHLF-AQTS-328D-T/1/H2, BHLF-AQTS-328Q-7/8/H2, BHLF-AQTS-328A-Q/3/H2, BHLF-AQTS-328X-E/10/H2, BHLF-AQTS-3286-C/10/H2, BHLF-AQTS-328G-W/10/H2, BHLF-AQTS-32Q1-Z/3/H2, BHLF-AQTS-32QE-M/3/H2, BHLF-AQTS-32QY-8/6/H2, BHLF-AQTS-32Q8-7/3/H2, BHLF-AQTS-32QZ-9/3/H2, BHLF-AQTS-32QC-J/2/H2

Post Regulation 19 Actions

A Housing Topic Paper Update will be produced to address some key issues arising from the consultation, including updated housing land supply information, and details of the housing trajectory and 5-year land supply (to be published following submission of the Local Plan).

Table H2 – In response to discussions with Havant Borough Council and Portsmouth City Council add a footnote to the figure of 1,900 to Table H2.

- Whether the Local Plan's phasing provisions accord with Government policy, including the existing and draft modified NPPF;
- Whether the phasing of new greenfield housing allocations would unnecessarily restrict the delivery of greenfield sites;
- The effect of policy H2 on the housing trajectory, 5 year land supply and delivery of a variety of housing sites;
- Whether brownfield sites are likely to deliver at the levels and rates expected, given potential issues of complexity and viability; and
- Whether the policy is likely to lead to 5 year land supply issues and whether it should include a mechanism for the release of phased sites in this event.

Local Plan Reference or document	Policy H3 Spatial Housing Distribution		
Total Number of Repres	presentations received 6		61
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		22	18
Sound		4	42
Complies with Duty to C	ooperate	19	22

Many representations support the inclusion of a settlement hierarchy in the Plan and the definition of the three broad spatial areas, but suggest changes to the targets for particular areas or settlements. The majority of representations are from development interests who are promoting specific sites, either 'omission' sites or supporting a Local Plan allocation. There are a variety of suggestions for new allocations, with representations promoting higher housing provision in various part of the District depending on the location of their sites. Some respondents criticise the assessments which have resulted in the 'scoring' for particular settlements in the hierarchy, but most suggest a general need for additional housing which their site could help meet.

The largest number of representations promoting new/existing housing allocations relate to the Market Towns and Rural Area (MTRA), although these cover a number of settlements. Most site promoters point to the sustainability of several rural settlements, with Denmead, Waltham Chase and Wickham being some that are frequently mentioned. A significant number of representations promote higher provision at Winchester town on the basis that it is the most sustainable location, with slightly fewer suggesting there should be higher provision in the south of the District, or the South Hampshire Urban Araes, particularly to help meet unmet needs in that area. A few representations suggest that provision is too high in the south of the District or Winchester Town area.

There was a representation from a neighbouring LPA (Portsmouth) requesting that neighbours accommodate a portion of their unmet need – see comments under Policy H2.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/51/H3, ANON-AQTS-3BSY-T/65/H3, ANON-AQTS-3B4C-5/6/H3, ANON-AQTS-3B8W-W/3/H3, ANON-AQTS-3273-8/1/H3, ANON-AQTS-3291-8/7/H3, ANON-AQTS-3292-9/3/H3, ANON-AQTS-3B5A-4/7/H3, ANON-AQTS-32CD-5 - Colden Common Parish Council/38/H3, ANON-AQTS-32GC-8/11/H3, ANON-AQTS-3299-G/14/H3, ANON-AQTS-32UE-R/4/H3, ANON-AQTS-32UB-N/1/H3, ANON-AQTS-329R-9/5/H3, ANON-AQTS-32N1-W/3/H3, ANON-AQTS-329E-V/5/H3, ANON-AQTS-3BRU-N/1/H3, ANON-AQTS-32NS-Y/9/H3, ANON-AQTS-329U-C/4/H3, ANON-AQTS-3B5G-A/5/H3, ANON-AQTS-329Q-8/32/H3, ANON-AQTS-32G7-V/13/H3, ANON-AQTS-32TT-6/2/H3, ANON-AQTS-3BQA-Z/18/H3, ANON-AQTS-32TA-K/2/H3, ANON-AQTS-3BPV-M/3/H3, ANON-AQTS-32TE-Q/3/H3, ANON-AQTS-3BX4-T/11/H3, ANON-AQTS-322T-4/5/H3, BHLF-AQTS-32EE-8/2/H3, BHLF-AQTS-32EY-V/5/H3, BHLF-AQTS-32EJ-D/4/H3, BHLF-AQTS-326E-S/3/H3, BHLF-AQTS-326Y-D/3/H3, BHLF-AQTS-3267-B/8/H3, BHLF-AQTS-326A-N/3/H3, BHLF-AQTS-326S-7/2/H3, BHLF-AQTS-326G-U/2/H3, BHLF-AQTS-32Y8-F/1/H3, BHLF-AQTS-32YX-F - Overton Parish Council/1/H3, BHLF-AQTS-32YN-5/1/H3, BHLF-AQTS-32YR-9/1/H3, BHLF-AQTS-328Y-F/10/H3, BHLF-AQTS-3289-F/6/H3, BHLF-AQTS-3288-E/6/H3, BHLF-AQTS-328D-T/3/H3, BHLF-AQTS-328Q-7/14/H3, BHLF-AQTS-328A-Q/5/H3, BHLF-AQTS-328V-C/5/H3, BHLF-AQTS-328W-D/3/H3, BHLF-AQTS-328X-E/15/H3, BHLF-AQTS-3286-C/16/H3, BHLF-AQTS-328G-W/15/H3, BHLF-AQTS-328J-Z/1/H3, BHLF-AQTS-32QE-M/5/H3, BHLF-AQTS-32QY-8/9/H3, BHLF-AQTS-32Q9-8/2/H3, BHLF-AQTS-32QZ-9/6/H3, BHLF-AQTS-32QC-J/4/H3, BHLF-AQTS-32Q2-1 - Portsmouth City Council/6/H3

Post Regulation 19 Actions

None

- Whether the Local Plan's spatial development strategy and settlement hierarchy is appropriate (overlaps with policy SP2 and other comments throughout the Plan); and
- Whether additional / alternative housing site allocations are needed (overlaps with policy H1 and other comments made throughout the Plan) and, if so, in which spatial areas / settlements.

Local Plan Reference or document	Develo	pment Within	Policy H4 Settlements
Total Number of Repres	Representations received 21		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		9	4
Sound		4	14

Complies with Duty to Cooperate 10 3

Summary of Representations

A majority of representations express concern that policy H4 is too restrictive or needs to be more flexible, although the policy does receive some support. Comments about flexibility focus mainly on promoting the potential for infill sites and small developments in sustainable locations outside settlement boundaries / infill areas to support the vitality of rural communities, enhance local services, and bring forward smaller sites. Several representations promote specific 'omission' sites, with a few other comments about lack of clarity of the infilling criteria or commenting on the explanatory text to the policy.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BCM-X/1/H4, ANON-AQTS-3BEW-A - Littleton and Harestock
Parish Council/61/H4, ANON-AQTS-3BJD-V/7/H4, ANON-AQTS-3BSY-T/81/H4,
ANON-AQTS-3B54-Q/5/H4, ANON-AQTS-32CD-5 - Colden Common Parish
Council/44/H4, ANON-AQTS-32UF-S/1/H4, ANON-AQTS-32UE-R/5/H4, ANON-AQTS-32UE-R/5/H4, ANON-AQTS-32SB-K - Defence Infrastructure Organisation/8/H4, ANON-AQTS-322T-4/6/H4, ANON-AQTS-3BB1-1/1/H4, BHLF-AQTS-32EE-8/3/H4, BHLF-AQTS-328Y-V/7/H4, BHLF-AQTS-328Q-7/15/H4, BHLF-AQTS-328X-B/18/H4,
BHLF-AQTS-328H-X/1/H4, BHLF-AQTS-32QE-M/8/H4, BHLF-AQTS-32QY-8/12/H4

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

• Whether the policy is unduly restrictive and clear in its requirements.

Local Plan Reference or document		Meeting Hou	Policy H5 using Needs
Total Number of Represe	entations received		21
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		14	5
Sound		8	13
Complies with Duty to C	ooperate	16	3

Summary of Representations

A number of concerns were raised regarding the policy's alignment with national policy, flexibility, and evidence base. Many stressed the need for flexible criteria in applying housing policies, particularly reflecting local needs and supported by current evidence, such as the Strategic Housing Market Assessment. Concerns were raised regarding the evidence for and deliverability of the percentage of self-build plots. Furthermore, considerations about the cost and

market interest in wheelchair-accessible homes are also noted, with an emphasis on accurate viability testing.

While there is support for diverse housing needs and promoting a variety of housing types, there is criticism of the policy's rigidity, particularly regarding requirements like dwelling sizes and accessibility standards which may not fit local conditions. The need for specialist housing, especially for older people, is evident, yet reliance on blanket requirements for significant residential schemes is deemed ineffective, urging the need for specific site allocations. There is also some support for accessible homes, but caution against excessive burden on housing providers, particularly with financial implications.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BCM-X/2/H5, ANON-AQTS-3BSY-T/92/H5, ANON-AQTS-3291-8/9/H5, ANON-AQTS-3B5A-4/8/H5, ANON-AQTS-32CD-5 - Colden Common Parish Council/48/H5, ANON-AQTS-32GC-8/13/H5, ANON-AQTS-32NS-Y/11/H5, ANON-AQTS-329Q-8/38/H5, ANON-AQTS-32UU-8/10/H5, ANON-AQTS-3274-9/5/H5, ANON-AQTS-32NA-D/1/H5, ANON-AQTS-32G7-V/15/H5, ANON-AQTS-3BQA-Z/21/H5, ANON-AQTS-32FT-R - New Alresford Town Council/10/H5, ANON-AQTS-322T-4/7/H5, BHLF-AQTS-32EJ-D/5/H5, BHLF-AQTS-326A-N/5/H5, BHLF-AQTS-328Q-7/17/H5, BHLF-AQTS-328X-E/21/H5, BHLF-AQTS-3286-C/20/H5, BHLF-AQTS-328G-W/19/H5

Post Regulation 19 Actions

None

- Whether the policy's approach to dwelling size and tenure is too prescriptive;
- Whether the proposed requirement for larger schemes to include self-build and specialist accommodation is appropriate and deliverable, and whether additional specific policies and allocations are required;
- Whether the policy sufficiently recognises the role local evidence can have in determining the appropriate dwelling mix; and
- Whether the policy requirements have been appropriately considered in the Plan viability assessment.

Local Plan Reference or document		Afforda	Policy H6 ble Housing
Total Number of Repres	entations received		22
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		13	2
Sound		5	11
Complies with Duty to C	ooperate	14	1
Summary of Representa	tions		

Many representations revolve around balancing ambitious affordable housing targets with practical viability concerns, especially on brownfield sites with higher development costs. The adaptability of policy to market changes is stressed, with many comments supporting flexible frameworks to address site-specific issues and changing economic conditions. There is also a focus on aligning housing with local needs and ensuring environmental goals, such as nutrient mitigation, are met without compromising housing delivery. Additionally, the need for high-quality design and integration of affordable housing with market offerings is emphasized, proposing enforced standards to maintain consistency/standards. Lastly, a distinct need for housing diversity, including specialised options for older populations, is identified to reflect unique cost constraints and national policy alignment.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/68/H6, ANON-AQTS-3291-8/8/H6, ANON-AQTS-32CD-5 - Colden Common Parish Council/40/H6, ANON-AQTS-32GC-8/12/H6, ANON-AQTS-32UZ-D/3/H6, ANON-AQTS-32UM-Z/6/H6, ANON-AQTS-32NS-Y/10/H6, ANON-AQTS-329Q-8/33/H6, ANON-AQTS-3274-9/4/H6, ANON-AQTS-3BX4-T/12/H6, ANON-AQTS-32MQ-V/6/H6, BHLF-AQTS-3267-B/10/H6, BHLF-AQTS-326A-N/4/H6, BHLF-AQTS-328Y-F/11/H6, BHLF-AQTS-3289-F/7/H6, BHLF-AQTS-3288-E/7/H6, BHLF-AQTS-328A-Q/6/H6, BHLF-AQTS-328X-E/17/H6, BHLF-AQTS-3286-C/17/H6, BHLF-AQTS-3284-A/13/H6, BHLF-AQTS-328M-3/3/H6, BHLF-AQTS-328G-W/16/H6

Post Regulation 19 Actions

A Proposed Modification to Local Plan policy H6 (page 230) to clarify the potential role more recent local evidence on housing need can have in considering affordable housing tenure.

- Whether the policy should make specific provision for further evidence of affordable housing need to inform the proposals;
- Whether the proposals for monitoring the costs of phosphorus mitigation and potentially reducing are effective and appropriate;
- Whether the policy will deliver sufficient affordable housing to meet needs;
- Whether the approach for older persons and supported housing is justified;
 and
- Whether the position regarding low cost home ownership is consistent with the NPPF.

Local Plan Reference or document	Policy H7 Affordable Housing Exception Sites to Meet Local		
	Needs		
Total Number of Repres	Representations received		4
Number of respondents	who confirmed they	Yes	No
consider the policy is -			

Legally Compliant	3	1
Sound	2	2
Complies with Duty to Cooperate	4	0

Two respondents support the policy. One thought Winchester was already providing more housing than required for local needs.

The English Rural Housing Association (ERHA) raised concern over the emphasis on community support, sought confirmation that there may be a number of sources of data to justify need, recognition that needs could be met in neighbouring settlements and parishes and confirmation that market housing could de included to assist delivery.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BJD-V/4/H7, ANON-AQTS-3BSY-T/48/H7, ANON-AQTS-32CD-5 Colden Common Parish Council/27/H7, ANON-AQTS-32NX-4/1/H7

Post Regulation 19 Actions

Amendment to criterion i of Policy H7 proposed to clarify that schemes may meet need of more than one settlement.

Main issues raised in representations received in regulation 19 consultation

- Whether the policy sufficiently explains the role market housing can play in delivery;
- The basis on which need is assessed; and
- The role of community support.

Local Plan Reference or document	Policy H8 Small Dwellings in the Countryside		
Total Number of Repres	sentations received 2		
Number of respondents consider the policy is –			
Legally Compliant		2	0
Sound		2	0
Complies with Duty to C	ooperate	2	0
	4.		

Summary of Representations

Both respondents supported this policy

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/8/H8, ANON-AQTS-32CD-5 - Colden Common Parish
Council/5/H8

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation Support for Policy H8.

Local Plan Reference or document	Policy H9 Purpose Built Student Accommodation		
Total Number of Repres	entations received		8
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		5	2
Sound		2	6
Complies with Duty to C	ooperate	5	2

Summary of Representations

Some representations highlighted the management and impact of purpose-built student accommodations (PBSA), with a clear emphasis on regulatory measures, policy effectiveness, and community impact. A respondent considered PBSA should be subject to the Community Infrastructure Levy due to their commercial nature and consequent strain on local resources.

Additionally, there's a concern about environmental effects, with calls for policies promoting sustainable transportation and limiting car use, considering many students could own cars.

Respondents suggest that student accommodations should abide by specific space standards and be strategically located near educational institutions to avoid disrupting residential areas. The importance of maintaining a balance between allowing educational institutions the flexibility to expand and the conservation of local character is also highlighted.

Finally, two respondents were concerned that criterion v was unclear or unduly restricted the development of PBSA.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/83/H9, **ANON-AQTS-32CD-5 - Colden Common Parish Council/46/H9**, ANON-AQTS-32U5-8/5/H9, ANON-AQTS-323A-J/7/H9, ANON-AQTS-32ZJ-2/3/H9, BHLF-AQTS-326P-4/8/H9, BHLF-AQTS-3284-A/17/H9, BHLF-AQTS-328K-1/18/H9

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

• Whether policy correctly considers the potential loss of open space;

- Whether the policy adequately safeguards residential amenity;
- Whether the Plan should be more specific about where purpose built student accommodation will be suitable; and
- Whether the approach to sustainable transport is appropriate, or should these requirements be stricter.

Local Plan Reference or document	Policy H10 Houses in Multiple Occupation (HMOs)		
Total Number of Repres	resentations received 2		
Number of respondents who confirmed they Yes consider the policy is –		No	
Legally Compliant		1	1
Sound		1	1
Complies with Duty to C	ooperate	1	1

One respondent supported the policy. The other considered the 20% threshold proposed in the Policy was too high and should be reduced, that the universities should be responsible for student accommodation and that the impact of parking should be reduced.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/70/H10, ANON-AQTS-323A-J/5/H10

Post Regulation 19 Actions

Minor Proposed Modifications to Local Plan policy H10 (page 240) to address post-regulation 19 consultation comments from Historic England.

Main issues raised in representations received in regulation 19 consultation

Whether policy adequately safeguards residential amenity.

Local Plan Reference or document	Policy H11 Housing for Essential Rural Workers		
Total Number of Repres	resentations received 1		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		1	0
Sound		1	0
Complies with Duty to C	ooperate	1	0

The single comment on this policy is supportive.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/78

Post Regulation 19 Actions

Minor Proposed Modifications to Local Plan policy H11 (page 243) to address post-regulation 19 comments from Historic England.

Main issues raised in representations received in regulation 19 consultation

Support for Policy H11.

Local Plan Reference	Policy H12		
or document	Provision for Gypsies	, Travellers ar	nd Travelling
		(Showpeople
Total Number of Repres	esentations received		4
Number of respondents who confirmed they		Yes	No
consider the policy is -			
Legally Compliant	4		0
Sound		2	2
Complies with Duty to C	cooperate	3	1
I			

Summary of Representations

Half of the representations made are supportive. Of the others, one questions whether all opportunities for site provision have been fully explored and another seeks a minor wording change regarding accessibility.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/89/H12, ANON-AQTS-3BQ9-R - Basingstoke and Deane
Borough Council/2/H12, ANON-AQTS-32UK-X - Environment Agency/17/H12,
BHLF-AQTS-3284-A/18/H12

Post Regulation 19 Actions

Minor Proposed Modifications to Local Plan policy H12iv (page 247) to address post-regulation 19 comments from Historic England.

- General support for policy H12; and
- Whether the scope for increasing traveller site provision by requiring sites to be provided in conjunction with site allocations has been fully explored.

Local Plan Reference	Policy H13
or document	Safeguarding Traveller Sites

Total Number of Representations received		1
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0

The single comment on this policy is supportive.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/54/H13

Post Regulation 19 Actions

Add a footnote to Local Plan policy H13 (pages 251/252) for clarification.

Main issues raised in representations received in regulation 19 consultation

• Support for policy H13.

Local Plan Reference or document	Policy H14 Authorised Traveller Site Intensification		
Total Number of Repres	entations received		1
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		1	0
Sound		1	0
Complies with Duty to C	ooperate	1	0

Summary of Representations

The single comment on this policy is supportive.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/33

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

• Support for policy H14.

Local Plan Reference or document	Policy H15 Authorised New/Expanded Traveller Sites	
Total Number of Repres	entations received	1

Number of respondents who confirmed they	Yes	No
consider the policy is -		
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0

The single comment on this policy is supportive.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/85/H15

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

Support for policy H15.

Local Plan Reference or document	The Nurserie	Policy H16 s, Shedfield
Total Number of Representations received		1
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0
Summary of Representations		

The single comment on this policy is supportive.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/94/H16

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation Support for policy H16.

Local Plan Reference or document		Policy H18 Tynefield, Whiteley
Total Number of Repres	entations received	1

Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0

The single comment on this policy is supportive.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/36/H18

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation Support for policy H18.

Creating a Vibrant Economy

Local Plan Reference or document	Vibra	Policy E1 nt Economy
Total Number of Representations received		8
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	1
Sound	2	4
Complies with Duty to Cooperate	5	1

Summary of Representations

Respondents have expressed that while the policy supports modernisation, it lacks sufficient recognition of the education, healthcare, retail, and leisure sectors that play a vital role in the local economy.

There is a call for greater flexibility in reusing developed sites by expanding the range of employment uses, particularly at sites like Solent Business Park. The policy is critiqued for not explicitly supporting the redevelopment of existing employment sites, which could enhance economic adaptability.

There is a consensus for policy amendments to include diverse employment sources beyond traditional industrial roles.

Respondents point to the need to reassess traffic and infrastructure provisions related to development projects, especially around key road network junctions, to prevent potential overcrowding.

Overall, there is strong advocacy for a broader and more flexible policy framework that reflects the dynamic and diverse economic landscape.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/29/E1, ANON-AQTS-3BPH-6/3/E1, ANON-AQTS-3298-F/5/E1, ANON-AQTS-32G3-R/3/E1, ANON-AQTS-32NR-X/5/E1, ANON-AQTS-32MQ-V/3/E1, BHLF-AQTS-32QF-N - National Highways/2/E1, BHLF-AQTS-32QY-8/3/E1

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

- Policy does not sufficiently recognise the education, healthcare, retail, and leisure sectors that play a vital role in the local economy;
- Policy should be more flexible in reusing developed sites by expanding the range of employment uses, particularly at sites like Solent Business Park;
- Policy should provide more explicit support for the redevelopment of existing employment sites;
- A need to reassess traffic and infrastructure provisions related to development projects, especially around key road network junctions, to prevent potential overcrowding; and
- Strong support for a broader and more flexible policy framework that reflects the dynamic and diverse economic landscape.

Local Plan Reference or document	Spatial Distribu	ution of Econo	Policy E2 omic Growth
Total Number of Represe	entations received		4
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		2	1
Sound		2	1
Complies with Duty to C	ooperate	3	0

Summary of Representations

Should be greater flexibility to adapt to evolving economic and environmental needs, especially in sectors such as warehousing and logistics.

There should be an updated review to enhance flexibility, allowing for adaptive planning models like those in Winnall.

Some respondents raised concerns about the prioritisation of housing over employment in locations like Sir John Moore Barracks.

Economic growth considerations require new allocations to meet employment demands, as existing policies may not support future economic needs thoroughly. Some respondents raised concerns about the strategic approach of carrying forward undelivered allocations without considering needed alternatives.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/41/E2, ANON-AQTS-3298-F/6/E2, ANON-AQTS-32F2-P/2/E2, BHLF-AQTS-328V-C/3/E2

Post Regulation 19 Actions None.

Main issues raised in representations received in regulation 19 consultation

- Policies should be more flexible regarding uses;
- Re-consider the balance of housing and employment at Sir John Moore Barracks:
- Additional allocations are required to meet employment demands; and
- Undelivered allocations should be re-assessed.

Local Plan Reference or document	Policy E3 Town Centres Strategy and Hierarchy		
Total Number of Repres	entations received		8
Number of respondents consider the policy is –			No
Legally Compliant		5	1
Sound		3	3
Complies with Duty to C	ooperate	6	0

Summary of Representations

Support for Policy E3 in recognising the role of town centres as multi-use town places that integrate healthcare with other services.

Concern that the policy does not sufficiently address the capacity challenges for retailers amidst evolving town centre dynamics.

There is support for the designation of Bishop's Waltham as a district centre that acknowledges its range of diverse services. However, there is a lack of local options for larger scale services that leads residents to travel to nearby towns like Eastleigh and Hedge End and Whiteley. Therefore, the policy needs to more effectively address local retail needs to reduce dependency on distant centres like Eastleigh, Hedge End, and Whiteley.

Reliance on high-level reports lacking detailed local trading and market information. There is a need for more locally-based, comprehensive retail impact assessments and household surveys to inform future strategies.

The cultural policy does not fully integrate Winchester's cultural identity, there should be more year-round cultural infrastructure beyond seasonal events. Creative spaces should be fostered, such as art and rehearsal studios, which are essential for sustaining local cultural talent. Culture should be recognised independently rather than being combined with sports.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BSH-9/1/E3, ANON-AQTS-3BSY-T/66/E3, ANON-AQTS-3298-F/8/E3, ANON-AQTS-32SJ-U/10/E3, **ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/16/E3**, BHLF-AQTS-32QE-M/6/E3, BHLF-AQTS-32QY-8/10/E3

Post Regulation 19 Actions

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to remove shopping frontages and identify Primary Shopping Areas in line with Policy E3 and Policy E7.

Main issues raised in representations received in regulation 19 consultation

- Emphasise the role of town centres as multi-use town places that integrate healthcare with other services;
- More locally-based assessments needed to inform future strategies;
- Re-asses the capacity challenges for retailers in town centres;
- Addressing the local retail needs in Bishops Waltham; and
- Winchester's full cultural identity needs to be further considered in policies.

Local Plan Reference or document	Policy E4 Main Town Centre Uses Out of Centre		
Total Number of Represent	resentations received 4		
Number of respondents wh consider the policy is –	nber of respondents who confirmed they sider the policy is –		
Legally Compliant		3	0
Sound		2	1
Complies with Duty to Coo	perate	3	0

Summary of Representations

There is support for Policy E4's focus on town centres as providing mutual benefits for uses. There are benefits of improved accessibility in relation to healthcare service distribution.

Some respondents consider there needs to be greater recognition of the role of out-of-centre retail and leisure activities. They suggest reducing thresholds to foster out-of-centre developments, aiming for a balance between maintaining town centre viability and allowing diversity in development locations, especially for locations like Winnall.

The 350 sqm threshold for out-of-centre retail and leisure proposals, is considered to be unjustified and has been established without appropriately considering scale, viability, and cumulative effects. The threshold is inconsistent with national standards that suggest a much larger threshold of 2,500 sqm. There should at least be a reversion to the previous local threshold of 1,000 sqm.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BSY-T/22/E4, ANON-AQTS-3298-F/3/E4, **ANON-AQTS-32Z7-F** - Hampshire Hospitals NHS Foundation Trust/2/E4, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/2/E4

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Policy does not sufficiently recognise the role of out-of-centre retail and leisure activities; and
- The proposed 350 sqm threshold for out-of-centre retail and leisure proposals, is considered to be unjustified and should either revert to the previous local threshold of 1,000 sqm, or the national threshold of 2,500 sqm.

Local Plan Reference or document	Enhancing E	mployment C	Policy E5 Opportunities
Total Number of Represer	tations received		5
Number of respondents w consider the policy is –	ho confirmed they	Yes	No
Legally Compliant		4	1
Sound		1	4
Complies with Duty to Co	operate	5	0

Summary of Representations

Some respondents considered Policy E5 does not sufficiently align with other strategic policies such as Policies E1, E2, E4, and W6, particularly failing to support employment development in non-traditional use classes e.g. in areas like Winnall, or promote economic growth in rural areas.

The definition of employment should be broadened to cover diverse economic activities, including those in academia, healthcare, and social infrastructure, A wider definition of employment uses would provide greater flexibility and adaptability.

The updated Employment Land Study identifies constraints in accommodating demand for warehouse and logistics spaces.

Some respondents raised concerns about relying too heavily on completion data for forecasting, which may not accurately reflect the demand for different employment spaces, such as those needed for logistics and warehousing, to better anticipate and meet future economic trends, an updated employment land study is recommended.

There should be greater examination of the deliverability of existing employment land allocations and their alignment with community needs.

Employment provision should be encouraged alongside housing to reflect the national framework.

Representation Numbers (Statutory consultees in bold and named) [ANON-AQTS-3BSY-T/84/E5, ANON-AQTS-3298-F/9/E5, ANON-AQTS-32U5-8/6/E5, ANON-AQTS-32F2-P/6/E5, ANON-AQTS-32MQ-V/9/E5]

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Better alignment with other strategic policies such as E1, E2, E4, and W6;
- Definition of employment should be broadened;
- There are constraints in accommodating demand for warehouse and logistics spaces;
- Completion data may not accurately reflect the demand for different employment spaces, such as those needed for logistics and warehousing, to better anticipate and meet future economic trends, an updated employment land study is required;
- There should be greater examination of the deliverability of existing employment land allocations and their alignment with community needs;
- Employment provision should be encouraged alongside housing to reflect the national framework.

Local Plan Reference or document	Policy E6 Retaining Employment Opportunities		
Total Number of Represe	entations received		5
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		3	1
Sound		1	4
Complies with Duty to C	ooperate	4	0

Summary of Representations

Clearer and more justified policy wording to prevent misinterpretation, particularly in the redevelopment of outdated employment sites.

The 12-month marketing requirement should be reduced to six months to avoid delays and unnecessary costs.

There is a need for improved guidance on marketing and viability assessments The policy is potentially too lenient, allowing the repurposing of employment land for less economically necessary uses. The policy needs to better reflect local economic needs especially in specific areas like Winnall where there is a need for a tailored approach.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/24/E6, ANON-AQTS-3BPH-6/2/E6, ANON-AQTS-3298-F/4/E6, BHLF-AQTS-326P-4/1/E6, **BHLF-AQTS-328R-8 - Hampshire County Council/8/E6**

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

- Re-word policy in respect of redevelopment of outdated employment sites;
- Re-assess and potentially reduce the 12-month marketing requirement;
- More guidance needed on marketing and viability assessments;
- Policy should be strengthened to prevent the repurposing of employment land for less economically necessary uses; and
- Tailor the policy in particular areas to better reflect local economic needs.

Local Plan Reference or document	Policy E7 Maintaining the Vitality and Viability of Town Centres		
Total Number of Represe	ntations received		1
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		1	0
Sound		1	0
Complies with Duty to Co	poperate	1	0
O (D		-	

Summary of Representations

The policy is well thought-out.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/80

Post Regulation 19 Actions

Proposed Modifications to Policy E7 to clarify parts applicable to the Primary Shopping Areas.

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to remove shopping frontages and identify Primary Shopping Areas in line with Policy E3 and Policy E7.

Local Plan Reference or document	Local Shop	os, Services a	Policy E8 nd Facilities
Total Number of Repres	resentations received 6		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		2	1
Sound		2	2
Complies with Duty to C	ooperate	3	0

There is support for the pragmatic nature of the policy regarding the challenges around primary shopping areas and HGV access.

Some respondents suggested that only non-local services and facilities and those with high needs for public access and accessibility should remain in town centres. The support for promoting arts and cultural amenities is welcomed.

The 12-month marketing requirement should be reduced to six months to avoid delays and unnecessary costs.

There is a need for improved guidance on marketing and viability assessments

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/72/E8, ANON-AQTS-32NM-S/1/E8, ANON-AQTS-32MQ-V/7/E8, **BHLF-AQTS-328R-8 - Hampshire County Council/22/E8**, BHLF-AQTS-32QE-M/7/E8, BHLF-AQTS-32QY-8/11/E8

Post Regulation 19 Actions

None

- Policy to allow only non-local services and facilities and those with high needs for public access and accessibility in town centres;
- Reduce the 12-month marketing requirement; and
- Produce improved guidance on marketing and viability assessments.

Local Plan Reference or document	Policy E9 Economic Development in the Rural Area		
Total Number of Repres	ber of Representations received 2		
Number of respondents consider the policy is –			No
Legally Compliant		1	1
Sound		1	1

Complies with Duty to Cooperate 0

Summary of Representations

There were two responses to this policy which highlighted the importance of balancing employment land allocation with the actual market demand, pointing out the risk of basing decisions on outdated studies.

There is a need for flexibility in local plans to align with market changes, particularly in logistics and green energy sectors.

There was some concern over rural economic growth being overlooked

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/95/E9, ANON-AQTS-32F2-P/7/E9

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Plan should be flexible, particularly in logistics and green energy sectors
- Need more up-to-date studies.

Local Plan Reference or document	Policy E10 Farm Diversification		Policy E10 versification
Total Number of Represent	ations received		1
Number of respondents wh consider the policy is –	no confirmed they	Yes	No
Legally Compliant		1	0
Sound		1	0
Complies with Duty to Coo	perate	1	0
Summary of Representation	ne		

Summary of Representations

General support for the policy.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/51/E10

Post Regulation 19 Actions

None

Local Plan Reference	Policy E11
or document	Visitor-Related Development Within the Countryside

Total Number of Representations received		1
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0

The response provided general support for the policy, whilst stressing that requiring overly detailed plans can result in delays in developments.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/55/E11

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation None

Site Allocations²

Winchester Site Allocations

Local Plan Reference Policy W1 Barton Farm Major Development Area (Kings Barton) or document **Total Number of Representations received.** 53 Number of respondents who confirmed they No Yes consider the policy is -**Legally Compliant** 20 29 Sound 9 40 **Complies with Duty to Cooperate** 36

Summary of Representations

to

There were significant concerns over the planned closure of Andover Road, with the overarching theme of traffic management and infrastructure being the main key issue that was raised (87%). The concerns around the closure of Andover Road centre around the increased traffic through residential areas like Kings Barton, raising safety risks for children, air and noise pollution. Leaving Andover Road open is considered to be one way to alleviate traffic congestion, especially given the ongoing developments. There was concern that the current policies are failing to address sustainable development objectives, with 58% expressing a need to

² Between Reg 18 and Reg 19 some site allocation policies were deleted due to sites being completed, but to enable responses on the original site allocation numbers these were not adjusted at Regulation 19.

align road policies with sustainability principles to enhance infrastructure and public transport services. Additionally, 51% of the feedback stresses the importance of prioritising safety and quality of life, with concerns on pedestrian and cyclist safety in any traffic plans. 43% of comments expressed that they wanted better inclusion of local feedback in decision-making, and legal compliance. Environmental considerations and public health issues were also raised (13%), and the need to improve public health standards through better planning strategies.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BN4-G/1/W1, ANON-AQTS-3BS3-M/1/W1, ANON-AQTS-3BTN-G/1/W1, ANON-AQTS-3BTR-M/1/W1, ANON-AQTS-3BTB-4/1/W1, ANON-AQTS-3BDF-R/1/W1, ANON-AQTS-3BDC-N/1/W1, ANON-AQTS-3BF8-C/1/W1, ANON-AQTS-3BZ8-Z/1/W1. ANON-AQTS-3BZV-X/1/W1. ANON-AQTS-3BKD-W/1/W1. ANON-AQTS-3BK8-H/1/W1, ANON-AQTS-3BKM-6/1/W1, ANON-AQTS-3BKN-7/1/W1, ANON-AQTS-3BAZ-9/1/W1, ANON-AQTS-3BA2-1/1/W1, ANON-AQTS-3BAR-1/1/W1, ANON-AQTS-3BDP-2/1/W1, ANON-AQTS-3B1S-J/1/W1, ANON-AQTS-3B1X-Q/1/W1, ANON-AQTS-3BH7-D/1/W1, ANON-AQTS-3BE8-B/1/W1, ANON-AQTS-3BEG-T/1/W1, ANON-AQTS-3BEB-N/1/W1, ANON-AQTS-3B6F-A/1/W1, ANON-AQTS-3B6C-7/1/W1, ANON-AQTS-3BY2-S/1/W1, ANON-AQTS-3BQF-5/1/W1, ANON-AQTS-3BWW-V/1/W1, ANON-AQTS-3BSY-T/2/W1, ANON-AQTS-3BPM-B/1/W1, ANON-AQTS-3BFT-8 - Crawley Parish Council/1/W1, ANON-AQTS-3BPB-Z/1/W1, ANON-AQTS-3B4H-A/1/W1, ANON-AQTS-3B56-S -NHS Hampshire and Isle of Wight ICB/1/W1, ANON-AQTS-3BBX-8/1/W1, ANON-AQTS-3299-G/1/W1, ANON-AQTS-32UZ-D/1/W1, ANON-AQTS-32UK-X -Environment Agency/1/W1, ANON-AQTS-32SJ-U/1/W1, ANON-AQTS-327U-A -Southern Water/1/W1, ANON-AQTS-32T7-9/1/W1, ANON-AQTS-3BX4-T/1/W1, ANON-AQTS-32TG-S/1/W1, ANON-AQTS-32T8-A/1/W1, ANON-AQTS-32FU-S/1/W1, ANON-AQTS-323S-4/1/W1, ANON-AQTS-323H-S/1/W1, BHLF-AQTS-326R-6/1/W1, BHLF-AQTS-326B-P/1/W1, BHLF-AQTS-32YW-E/1/W1, BHLF-AQTS-3284-A/1/W1, BHLF-AQTS-328R-8 - Hampshire County Council/1/W1

Post Regulation 19 Actions

Proposed Change agreed with the Environment Agency in relation to paragraph 12.10.

- Significant concerns over the planned closure of Andover Road, with the overarching theme of traffic management and infrastructure planning;
- The concerns around the closure of Andover Road centre around the increased traffic through residential areas like Kings Barton, raising safety risks for children, air and noise pollution;
- Leaving Andover Road open is considered to be one way to alleviate traffic congestion, especially given the ongoing developments; and
- Concern that the current policies are failing to address sustainable development objectives and the need to align road policies with sustainability principles to enhance infrastructure and public transport services.

Local Plan Reference or document	Sir John	Policy W2 Moore Barracks
Total Number of Representations re	ceived.	66
Number of respondents who confirm consider the policy is –	med they Y	es No
Legally Compliant		28 32
Sound		9 52
Complies with Duty to Cooperate		29 31

There were significant concerns regarding the proposed redevelopment of this site which were linked with the planned closure of Andover Road. The closure of the Andover Road is expected to redirect traffic through residential areas like Kings Barton and Abbotts Barton, and the concerns raised say this will lead to increased congestion, emissions, and safety risks and that the redevelopment of Sir John Moore Barracks would exacerbate traffic challenges if Andover Road is closed as part of the Kings Barton development. Although the redevelopment of the SJM Barracks site includes a Park and Ride facility which promises some relief, current public transport options are deemed to be inadequate. There is a 3,200-signature petition urging the council to reconsider their planning approach towards the closure of Andover Road.

Environmental concerns about the redevelopment of the site for residential development focus on the potential impact on local biodiversity, the plans to designate northern fields as a candidate SINC and the need for comprehensive ecological assessment.

Concerns were also expressed about the emphasis on housing over the need for recreational facilities, school places and the need for greater alignment with community needs and national policies.

Respondents expressed concerns about the engagement process, unmet need allowance that places undue pressure on the SJM Barracks site, disagreement between representators about whether the whole site is previously developed land, policy guidance/process that is being followed for the Concept Masterplan, lack of information regarding the delivery of the P&R facility and the description of the P&R.

Overall, it is considered that there is a need for an integrated approach to development on the site that respects both environmental and heritage values.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BN4-G/2/W2, ANON-AQTS-3BS3-M/2/W2, ANON-AQTS-3BTN-G/2/W2, ANON-AQTS-3BTR-M/2/W2, ANON-AQTS-3BDF-R/2/W2, ANON-AQTS-3BF8-C/2/W2, ANON-AQTS-3BFP-4/1/W2, ANON-AQTS-3BZV-X/2/W2, ANON-AQTS-3BZH-G/1/W2, ANON-AQTS-3BKD-W/2/W2, ANON-AQTS-3BK8-H/2/W2, ANON-AQTS-3BA1-Z/1/W2, ANON-AQTS-3BAR-

1/2/W2, ANON-AQTS-3BDP-2/3/W2, ANON-AQTS-3B1S-J/2/W2, ANON-AQTS-3B1X-Q/2/W2. ANON-AQTS-3B17-P/1/W2. ANON-AQTS-3BH1-7/1/W2. ANON-AQTS-3BH7-D/2/W2, ANON-AQTS-3BEG-T/2/W2, ANON-AQTS-3BEB-N/2/W2, ANON-AQTS-3B6F-A/2/W2, ANON-AQTS-3BY2-S/2/W2, ANON-AQTS-3B87-W/1/W2, ANON-AQTS-3BQF-5/2/W2, ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/8/W2, ANON-AQTS-3BWW-V/2/W2, ANON-AQTS-3BSY-T/12/W2, ANON-AQTS-3BP2-G/1/W2, ANON-AQTS-3BPM-B/2/W2, ANON-AQTS-3BP5-K/1/W2, ANON-AQTS-3BFT-8 - Crawley Parish Council/2/W2, ANON-AQTS-3BPB-Z/2/W2, ANON-AQTS-3B4H-A/2/W2, ANON-AQTS-3B56-S -NHS Hampshire and Isle of Wight ICB/6/W2. ANON-AQTS-3BBX-8/2/W2. ANON-AQTS-32GC-8/2/W2, ANON-AQTS-3299-G/3/W2, ANON-AQTS-32GN-K/1/W2, ANON-AQTS-32UZ-D/2/W2, ANON-AQTS-32UK-X - Environment Agency/4/W2, ANON-AQTS-32N9-5/1/W2, ANON-AQTS-32N5-1/1/W2, ANON-AQTS-329Q-8/5/W2, ANON-AQTS-32SJ-U/2/W2, ANON-AQTS-327U-A -Southern Water/8/W2, ANON-AQTS-32T7-9/2/W2, ANON-AQTS-3BX4-T/2/W2, ANON-AQTS-32TG-S/2/W2, ANON-AQTS-32SB-K - Defence Infrastructure Organisation/2/W2, ANON-AQTS-32FU-S/2/W2, ANON-AQTS-323S-4/2/W2, ANON-AQTS-323H-S/2/W2, ANON-AQTS-32M1-V/1/W2, ANON-AQTS-32ZS-B/2/W2, ANON-AQTS-32DP-J/1/W2, ANON-AQTS-3B8M-K/2/W2, BHLF-AQTS-326J-X/1/W2, BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/1/W2, BHLF-AQTS-3282-8 - Natural England/3/W2, BHLF-AQTS-328V-C/1/W2, BHLF-AQTS-3284-A/3/W2, BHLF-AQTS-328M-3/1/W2, BHLF-AQTS-328R-8 - Hampshire County Council/5/W2, BHLF-AQTS-32QQ-Z/2/W2

Post Regulation 19 Actions

Proposed Modifications following the analysis of the amendments that were put forward by the DIO/Avison Young in terms of changes to supporting text (site description, paragraphs 12.18, 12.25, 12.29) and the wording of the criteria xvii in Policy W2.

Proposed Modifications agreed with Historic England regarding the wording of paragraph 12.37 and the wording of criterion xiv in Policy W2.

Proposed Modification agreed with the HIOW ICB regarding addition of wording in criterion ii of Policy W2.

- There were significant concerns regarding the proposed redevelopment of the site which were linked with the planned closure of Andover Road;
- This closure of the Andover Road is expected to redirect traffic through residential areas like Kings Barton and Abbotts Barton, leading to increased congestion, emissions, and safety risks;
- The redevelopment of Sir John Moore Barracks would exacerbate traffic challenges if Andover Road is closed as part of the Kings Barton development;
- Details about the P&R and the delivery of this; and

 Environmental concerns about the redevelopment of the site for residential development focus on the potential impact on local biodiversity and plans to designate northern fields as a candidate SINC.

Local Plan Reference or document	St Pete	Policy W3 r's Car Park
Total Number of Representations received.		13
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	10	1
Sound	8	3
Complies with Duty to Cooperate	9	2

Summary of Representations

The key concern regarding the planned redevelopment of St Peter's car park for residential development revolve around access and mobility, balancing the need for sufficient city centre car parking for residents and supporting city vitality against the pressure and the need for housing development. Respondents raised concern regarding environmental concerns which focused on flooding and maintaining ecological balance, with calls for appropriate flood mitigation strategies. This coincides with comments indicating that there were mixed feelings about the redevelopment of the site for housing against the need for social housing.

Economic and educational impacts were raised along with the importance of maintaining the site as a car park to support local businesses and educational institutions. Concerns were also raised about infrastructure and the need to maintain access to essential underground utilities.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BN4-G/4/W3, ANON-AQTS-3BS3-M/3/W3, ANON-AQTS-3BJD-V/3/W3, ANON-AQTS-3BSY-T/39/W3, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/13/W3, ANON-AQTS-3299-G/8/W3, ANON-AQTS-32UK-X - Environment Agency/10/W3, ANON-AQTS-327U-A - Southern Water/16/W3, ANON-AQTS-327Q-6/1/W3, ANON-AQTS-3B8M-K/8/W3, BHLF-AQTS-3264-8/2/W3, BHLF-AQTS-32Y6-D/1/W3, BHLF-AQTS-328R-8 - Hampshire County Council/11/W3

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England regarding the wording of paragraph 12.37 and the wording of criterion iii in Policy W3.

Proposed Modifications agreed with the Environment Agency regarding criterion x in Policy W3

- Concerns revolve around access and mobility, balancing the need for sufficient city centre car parking for residents and supporting city vitality against pressure and need for new housing developments;
- Concerns were also expressed regarding flood risk and maintaining ecological balance, with calls for appropriate flood mitigation strategies;
- There were mixed feelings about the re-development of the site for housing against the need for social housing; and
- Concerns were also raised about infrastructure and the need to maintain access to essential underground utilities.

Local Plan Reference or document	Land	l West of Cou	Policy W4 rtenay Road
Total Number of Repres	entations received.		82
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		12	63
Sound		6	70
Complies with Duty to C	ooperate	64	11

Concerns were raised about the insufficient provision of open spaces and community amenities, including parks and allotments, which they argue exacerbates existing shortfalls. The redevelopment of this site for residential development is not considered to comply with the national planning policies, such as greenfield site protection and biodiversity conservation.

Respondents were particularly concerned about priority species and wildlife corridors, bats and called for an ecological assessment. There were calls for the site to be safeguarded as accessible green space that is protected from housing development. Concerns were also raised about increased traffic through an existing residential area, insufficient parking which poses a risk to safety and neighbourhood tranquillity.

The impact of this proposed development on local infrastructure and services (schools, healthcare and public transport) was also raised. The need to provide active travel links from this site to Kings Barton. There were other comments that the phasing of development needs to be adjusted to address urgent housing needs better.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BN4-G/7/W4, ANON-AQTS-3B1H-7/1/W4, ANON-AQTS-3BEA-M/1/W4, ANON-AQTS-3BQR-H/1/W4, ANON-AQTS-3B8K-H/1/W4, ANON-AQTS-3BRS-K/1/W4, ANON-AQTS-3BRN-E/1/W4, ANON-AQTS-3BJ7-F/1/W4, ANON-AQTS-3BJA-S/1/W4, ANON-AQTS-3BJD-V/6/W4, ANON-AQTS-3BPE-3/1/W4, ANON-AQTS-3BSY-T/79/W4, ANON-AQTS-3BPZ-R/1/W4, ANON-AQTS-3B4Z-V/1/W4, ANON-AQTS-3B4A-3/1/W4, ANON-AQTS-3B4S-N/1/W4, ANON-AQTS-3BB3-3/1/W4, ANON-AQTS-3BBS-3/1/W4, ANON-AQTS-3279-E/1/W4, ANON-AQTS-

329D-U/1/W4, ANON-AQTS-3299-G/17/W4, ANON-AQTS-32GJ-F/1/W4, ANON-AQTS-32UW-A/1/W4. ANON-AQTS-32U6-9/1/W4. ANON-AQTS-32N5-1/2/W4. ANON-AQTS-32S9-A/1/W4, ANON-AQTS-32S4-5/1/W4, ANON-AQTS-32SJ-U/11/W4, ANON-AQTS-32FV-T/1/W4, ANON-AQTS-3237-8/1/W4, ANON-AQTS-323P-1/1/W4, ANON-AQTS-322U-5/1/W4, ANON-AQTS-322J-T/1/W4, ANON-AQTS-32MF-H/1/W4, ANON-AQTS-32M3-X/1/W4, ANON-AQTS-32M7-2/1/W4, ANON-AQTS-32MH-K/1/W4, ANON-AQTS-32MR-W/1/W4, ANON-AQTS-32MK-P/2/W4, ANON-AQTS-32ZQ-9/1/W4, ANON-AQTS-32ZC-U/1/W4, ANON-AQTS-32ZA-S/1/W4, ANON-AQTS-32Z5-D/1/W4, ANON-AQTS-32K8-1/1/W4, ANON-AQTS-32MS-X/1/W4. ANON-AQTS-3B1Q-G/1/W4. ANON-AQTS-32HP-P/1/W4. ANON-AQTS-32H6-V/1/W4, BHLF-AQTS-32EQ-M/1/W4, BHLF-AQTS-32EZ-W/1/W4, BHLF-AQTS-32E3-P/1/W4, BHLF-AQTS-32E7-T/1/W4, BHLF-AQTS-32EV-S/1/W4, BHLF-AQTS-32EW-T/1/W4, BHLF-AQTS-32EX-U/1/W4, BHLF-AQTS-32E6-S/1/W4, BHLF-AQTS-32E4-Q/1/W4, BHLF-AQTS-32EM-G/1/W4, BHLF-AQTS-32EG-A/1/W4, BHLF-AQTS-32EN-H/1/W4, BHLF-AQTS-32E5-R/1/W4, BHLF-AQTS-326F-T/1/W4, BHLF-AQTS-3261-5/1/W4, BHLF-AQTS-326T-8/1/W4, BHLF-AQTS-326D-R/1/W4, BHLF-AQTS-326Q-5/1/W4, BHLF-AQTS-326Z-E/1/W4, BHLF-AQTS-326C-Q/1/W4, BHLF-AQTS-3263-7/2/W4, BHLF-AQTS-326P-4/6/W4, BHLF-AQTS-326M-1/1/W4, BHLF-AQTS-326N-2/1/W4, BHLF-AQTS-32YD-U/1/W4, BHLF-AQTS-32YZ-H/1/W4, BHLF-AQTS-32Y2-9/1/W4, BHLF-AQTS-32YA-R/1/W4, BHLF-AQTS-32YP-7/1/W4, BHLF-AQTS-32YU-C/1/W4, BHLF-AQTS-328F-V/1/W4, BHLF-AQTS-328R-8 -Hampshire County Council/27/W4, BHLF-AQTS-32QQ-Z/11/W4

Post Regulation 19 Actions

Proposed Modifications – additional text added to paragraph 12.41 regarding Barton Meadows Nature Reserve following a discussion with Officers regarding the HIWWT representation.

Proposed Modification agreed with HCC regarding the wording of criterion iii in Policy W4.

Proposed Modification agreed with the HIOW ICB regarding addition of wording in vi.

Main issues raised in representations received in regulation 19 consultation.

- Insufficient provision of open spaces and community amenities, including parks and allotments;
- Concern regarding the development of a greenfield site and how this complies with national policies;
- Concern regarding priority species and wildlife corridors and the need for ecological assessments and protection; and
- Adequacy of local infrastructure to be able to accommodate development on this site.

Local	l Plan	Reference
LUGA	ı mıalı	Veielence

Policy W5

or document	Bus	hfield Camp
Total Number of Representations received.		42
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	17	12
Sound	4	27
Complies with Duty to Cooperate	17	12

Concerns were raised about the alignment of this policy with national and local environmental plans, particularly regarding biodiversity and the protection of natural habitats. Concerns were raised over the development's potential harm to biodiversity/ecological areas. It was considered that the proposed development would adversely affect local recreational spaces and instead the site should be preserved as green accessible spaces/Country Park/Local Green Space for public use.

Respondents expressed comments that the development of this site was in direct conflict with Winchester City Council's carbon neutrality goals by 2030, reducing carbon emissions and the national biodiversity goal. The site contains a diverse range of habitats for rare species and should be protected from development. Comments question whether the development would truly benefit local economy or simply disrupt existing employment dynamics as development should instead be directed to a site within the Winchester settlement boundary.

Concerns were raised issues related to transport and infrastructure and a lack of sustainable travel initiatives which would increase traffic and emissions.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BR1-H/6/W5, ANON-AQTS-3BR4-M/1/W5, ANON-AQTS-3BSY-T/76/W5, ANON-AQTS-3BPX-P/1/W5, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/27/W5, ANON-AQTS-327A-P/1/W5, ANON-AQTS-32CQ-J/1/W5, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/13/W5, ANON-AQTS-3299-G/16/W5, ANON-AQTS-32N9-5/4/W5, ANON-AQTS-32NY-5/1/W5, ANON-AQTS-32U5-8/4/W5, ANON-AQTS-327U-A -Southern Water/31/W5, ANON-AQTS-3BBF-P/1/W5, ANON-AQTS-32F8-V/2/W5, ANON-AQTS-32F2-P/5/W5, ANON-AQTS-32MA-C/1/W5, ANON-AQTS-32MP-U/1/W5, ANON-AQTS-32MB-D/1/W5, ANON-AQTS-32MK-P/1/W5, ANON-AQTS-32ZS-B/6/W5, ANON-AQTS-32K9-2/2/W5, ANON-AQTS-3B8M-K/15/W5, ANON-AQTS-32N7-3 - Twyford Parish Council/3/W5, BHLF-AQTS-32E9-V/1/W5, BHLF-AQTS-32E8-U - Otterbourne Parish Council/1/W5, BHLF-AQTS-32ET-Q/1/W5, BHLF-AQTS-32EU-R - Hursley Parish Council/4/W5, BHLF-AQTS-326P-4/5/W5, BHLF-AQTS-3264-8/4/W5, BHLF-AQTS-326H-V/1/W5, BHLF-AQTS-32YF-W/1/W5, BHLF-AQTS-32Y1-8/1/W5, BHLF-AQTS-32YE-V/1/W5, BHLF-AQTS-32YY-G/1/W5, BHLF-AQTS-32YQ-8/5/W5, BHLF-AQTS-32Y3-A/1/W5, BHLF-AQTS-3282-8 - Natural England/14/W5, BHLF-AQTS-328V-C/6/W5, BHLF-AQTS-3284-A/16/W5, BHLF-AQTS-328M-3/4/W5, BHLF-AQTS-32QQ-Z/10/W5

Post Regulation 19 Actions

Proposed Modifications from Natural England regarding paragraph 12.52.

Proposed Modifications from Historic England regarding criterion xii in Policy W5.

Proposed Modifications from Southern Water regrading criterion xix.

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps.

Main issues raised in representations received in regulation 19 consultation.

- Alignment of this policy with national and local environmental plans, biodiversity and the protection of natural habitats;
- Impact that the proposed development on local recreational spaces and preserving green spaces that are in public use;
- The proposed development would conflict with Winchester City Council's carbon neutrality goals; and
- Whether the development would truly benefit local economy along with concerns regarding transport and infrastructure as a result of this development.

Local Plan Reference or document		Policy W6 Winnall
Total Number of Representations received.		9
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	8	1
Sound	1	8
Complies with Duty to Cooperate	7	2

Summary of Representations

The respondents comments centre around the policy's lack of flexibility to support a diverse range of employment uses, particularly in terms of retail and leisure sectors and the alignment of the policy with national policies and local employment needs. These concerns relate to the need to widen the policy wording to a broader range of employment-generating activities beyond traditional industrial uses to better reflect the diverse economic base (to allow out of town developments).

Concerns expressed on the effectiveness of being able to accommodate modern employment generating development in outdated buildings. There were concerns about infrastructure and environmental issues and a point from Southern Water about the need to align any future growth of this industrial estate with the capacity of the sewerage infrastructure.

Connectivity and accessibility of the industrial estate were highlighted as areas that needed enhancement in terms of the need to improve pedestrian, cycle, along with public transport links.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BSY-T/5/W6, ANON-AQTS-3BPH-6/1/W6, **ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/2/W6**, ANON-AQTS-3299-G/2/W6, ANON-AQTS-3298-F/1/W6, ANON-AQTS-3BBW-7/1/W6, **ANON-AQTS-327U-A - Southern Water/4/W6**, ANON-AQTS-32F2-P/1/W6, ANON-AQTS-3B8M-K/1/W6

Post Regulation 19 Actions

Proposed Modifications agreed with Southern Water regarding the wording of criterion xix in Policy W6 and a new criterion added between criterion vii and viii (capacity of the sewer network).

Modification to Local Plan policies map is proposed to include the boundary of the South Downs National Park in the allocation and inset maps in response to SDNP comment.

Main issues raised in representations received in regulation 19 consultation.

- The need for flexibility in order to support a diverse range of employment uses, particularly in terms of retail and leisure sectors beyond traditional industrial uses in order to better reflect the diverse economic base;
- The need to align any future growth of this industrial estate with the capacity of the sewerage infrastructure; and
- Connectivity and accessibility were highlighted as areas needing enhancement in terms of the need to improve pedestrian, cycle, and public transport links.

Local Plan Reference or document	Centra	l Winchester R	Policy W7 egeneration
Total Number of Represe	ntations received.		18
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		10	6
Sound		6	10
Complies with Duty to Co	ooperate	9	7

Summary of Representations

Respondents expressed concern that there is not yet a coherent masterplan for the site which is impacting landowners who face uncertainty. Concerns were expressed regarding public engagement process around key regeneration projects and the need for a more detailed and collaborative planning approach. Comments were made regarding sustainability and environmental issues of redeveloping this

site and the need to address flood risks, improving infrastructure, and balancing the need for development across brownfield and greenfield sites.

More detail is required on the proposed housing strategy, dwelling calculations and the need for comprehensive spatial plan whilst there were also concerns over affordable housing. In terms of education provision, as schools in this immediate area are under pressure this will require further investigation.

Comments were also made regarding the proposal to relocate the bus station and the need for a detailed movement strategy that is supported sustainable transport including walking, cycling and public transport.

There was also the need for high-quality design and public spaces.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BN4-G/5/W7, ANON-AQTS-3BSY-T/40/W7, ANON-AQTS-3B46-R/1/W7, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/15/W7, ANON-AQTS-3299-G/9/W7, ANON-AQTS-32UK-X - Environment
Agency/11/W7, ANON-AQTS-32N2-X/3/W7, ANON-AQTS-32N9-5/3/W7, ANON-AQTS-329Q-8/18/W7, ANON-AQTS-32SJ-U/6/W7, ANON-AQTS-327U-A - Southern Water/18/W7, ANON-AQTS-32T7-9/6/W7, ANON-AQTS-32T4-6/3/W7, ANON-AQTS-32K9-2/1/W7, ANON-AQTS-3B8M-K/9/W7, BHLF-AQTS-326P-4/3/W7, BHLF-AQTS-32YQ-8/3/W7, BHLF-AQTS-328R-8 - Hampshire County Council/13/W7

Post Regulation 19 Actions

Proposed Modifications agreed with the Environment Agency regarding criterion xvi.

Proposed Modification agreed with the HIOW ICB regarding addition of wording in criterion xv of Policy W7.

Main issues raised in representations received in regulation 19 consultation.

- Need for a coherent masterplan for the site which is impacting landowners who face uncertainty and a detailed explanation of the site allocation and dwelling estimates;
- Public engagement in policy-making for key regeneration projects;
- Sustainability and environmental issues regarding the redevelopment of this
 and the need to address flood risks, improving infrastructure, and balancing
 the need for development across brownfield and greenfield sites; and
- The proposed housing strategy, dwelling calculations and the need for comprehensive spatial plan whilst there were also concerns over affordable housing and the impact of the proposed development on education;

Local Plan Reference or document	Policy W8 Station Approach Regeneration Area	
Total Number of Repres	entations received.	19

Number of respondents who confirmed they	Yes	No
consider the policy is –		
Legally Compliant	11	5
Sound	5	11
Complies with Duty to Cooperate	10	6

There was support for mixed-use development on this site that includes a transport hub, with a suggestion that there is there is the need for greater flexibility for the uses that would be allowed on the site as it is not located in the historic centre. There were concerns regarding the impact on office vacancies and the need to manage movement, particularly buses, within the Winchester Movement Strategy and to connect together key locations in the town centre, educational institutions and employment area in order to unlock the sites full potential.

Respondents expressed concern regarding the absence of references to the Local Cycling and Walking Infrastructure Plan (LCWIP) and the need to help address a reduction in car use. Comments were made that the public engagement process had been robust, and it had allowed people to input shaping and refining the development principles that were included in the recent public consultation on the draft Concept Masterplan.

There were also comments regarding the need to ensure that the trees on the site were preserved and the need to plant more trees as part of any redevelopment proposals. Alongside this there was the need to integrate environmental quality into any public realm improvements on the site.

Comments were also made on the need for better provision for the elderly and those with mobility challenges as part of the redevelopment of the site. Deliverability of the site was questioned given that the site is in multiple land ownerships and how this aligns with the delivery timescale.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BN4-G/3/W8, ANON-AQTS-3BR1-H/3/W8, ANON-AQTS-3BJD-V/1/W8, ANON-AQTS-3BSY-T/31/W8, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/12/W8, ANON-AQTS-3299-G/7/W8, ANON-AQTS-32N2-X/2/W8, ANON-AQTS-32N9-5/2/W8, ANON-AQTS-329Q-8/13/W8, ANON-AQTS-32SJ-U/5/W8, ANON-AQTS-327U-A - Southern Water/14/W8, ANON-AQTS-32T7-9/5/W8, ANON-AQTS-32T4-6/2/W8, ANON-AQTS-3B8M-K/4/W8, BHLF-AQTS-326P-4/2/W8, BHLF-AQTS-32YQ-8/2/W8, BHLF-AQTS-32YH-Y - Network Rail/2/W8, BHLF-AQTS-3284-A/7/W8, BHLF-AQTS-328R-8 - Hampshire County Council/9/W8

Post Regulation 19 Actions

Proposed Modifications agreed with Historic England to amend the wording of paragraph 12.78 and deletion of criterion vi in Policy W8 (duplication of text).

Proposed Modification agreed with the HIOW ICB regarding addition of wording in criterion x of Policy W8.

Main issues raised in representations received in regulation 19 consultation.

- Support for mixed-use development that included a transport hub and the need for greater flexibility for the uses on the site as it is not located in the historic centre;
- The need to manage movement, particularly buses and to connect together key locations in the town centre, educational institutions and employment area in order to unlock the sites full potential;
- Public engagement process had been robust, and it had allowed people to input shaping and refining the development principles that were included in the recent public consultation on the draft Concept Masterplan; and
- The need to integrate environmental quality into the public realm and the need for better provision for the elderly and those with mobility challenges as part of the redevelopment of the site.

Local Plan Reference or document	Policy W9 Bar End Depot	
Total Number of Representations received.		10
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	7	2
Sound	5	4
Complies with Duty to Cooperate	7	2

Comments were made that as the Bar End area had been identified as a 'Opportunity area' in the Local Plan there was the need to adopt a more comprehensive approach/planning framework for this area. This should be linked to the Winchester Movement Strategy and the need for better integration with surrounding areas and transport policies.

Infrastructure and facilities in the local area are considered to be in need of improvement especially in terms of active travel routes for cycling and walking. With regard to sustainability, while there is support for policies enhancing views and relationships with the South Downs National Park, the 10% Biodiversity Net gain is considered to be insufficient to support the promotion of local food and healthy lifestyles.

Comments were made that the plans for the redevelopment of the site should include local amenities (shops and facilities) for the benefit of local residents and the fact that there is no detail in the Local Plan on the mechanism for the delivery on this housing on this site.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BQT-K/1/W9, ANON-AQTS-3BJS-B/1/W9, ANON-AQTS-3BSYT/64/W9, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/19/W9,
ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/10/W9,
ANON-AQTS-3299-G/13/W9, ANON-AQTS-3B8M-K/11/W9, BHLF-AQTS-3264-

8/3/W9, BHLF-AQTS-32YQ-8/4/W9, BHLF-AQTS-328R-8 - Hampshire County Council/17/W9

Post Regulation 19 Actions

Proposed Modification as a result of incorrectly omitting a criterion from Policy W9 in the Regulation 19 Local Plan.

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps.

Main issues raised in representations received in regulation 19 consultation.

- Need to adopt a more comprehensive approach/planning framework for this area that should be linked to the Winchester Movement Strategy;
- Active travel routes for cycling and walking need to be improved;
- The plans for the development of this site should include local amenities (shops and facilities) for the benefit of the immediate area; and
- No detail in the Local Plan on the mechanism for the delivery on this housing on this site.

Local Plan Reference or document	Former River	Park Leisure	Policy W10 Centre Site
Total Number of Represe	entations received.		14
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		8	5
Sound		4	9
Complies with Duty to C	ooperate	7	6

Summary of Representations

There is the need for a comprehensive plan for the site which outlines the areas potential that includes a detailed delivery timescale. As the area is at risk from flooding this needs careful planning in order to ensure that any proposals for the site do not exacerbate flood risk.

There is the need to retain the site for public recreation/use and to preserve open spaces for sport and leisure activities.

Concerns were expressed that the proper process have not been followed before the site can be redeveloped as there is a restrictive covenant/trust on the site. As no agreement has been reached with the University of Southampton, this indicates that there is no interest in this site. The council should investigate converting the existing building to another use, the site should be used for ecological benefits/nature-based solutions or for sporting facilities such as netball, basketball provided it is supported by adequate car parking.

Comments were made that policy is not addressing the cultural and educational needs. Wastewater capacity in the area is limited and this would need to be

assessed in order to ensure that it does not place a burden on the sewerage infrastructure.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BR1-H/1/W10, ANON-AQTS-3BSY-T/26/W10, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/5/W10, ANON-AQTS-3299-G/5/W10, ANON-AQTS-32UK-X - Environment Agency/8/W10, ANON-AQTS-32N2-X/1/W10, ANON-AQTS-327U-A - Southern Water/13/W10, ANON-AQTS-32MJ-N/1/W10, ANON-AQTS-32ZS-B/3/W10, ANON-AQTS-32H7-W/1/W10, ANON-AQTS-32HM-K/1/W10, BHLF-AQTS-3264-8/1/W10, BHLF-AQTS-32YQ-8/1/W10, BHLF-AQTS-3284-A/6/W10

Post Regulation 19 Actions

Proposed Modification agreed with Historic England in relation to paragraph 12.106.

Proposed Modification agreed with the Environment Agency in relation to criterion v of Policy W10.

Proposed Modification agreed with Southern Water – addition of new criterion to Policy W10 (sewerage capacity assessment).

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps.

Main issues raised in representations received in regulation 19 consultation.

- There is the need for a comprehensive plan for the site which outlines the areas potential which includes detailed delivery timescale;
- As flooding is an issue to any proposals need to ensure that they not exacerbate flood risk;
- The site should be retained for public recreation/use, leisure and sporting activities:
- The proper process has not been followed due to the restrictive covenant/trust on the land;
- The need to investigate converting the existing building for other use, ecological benefits/nature-based solutions or for sporting facilities; and
- Wastewater capacity needs to be investigated.

Local Plan Reference or document	Policy W11 University of Winchester / Royal Hampshire County		
	Hospital		Hospital
Total Number of Represe	entations received.		8
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		7	0

Sound	4	3
Complies with Duty to Cooperate	6	1

The site's potential for new development, including housing, was supported but this must ensure that essential hospital services are preserved. Any plans for the site must be undertaken in collaboration with the NHS Trust who would be supportive of a healthcare-specific masterplan in order to secure the long-term investment and improvements to the site and the unique challenges and opportunities of the site. Any future development on the site need to consider on-site energy generation.

Given the proximity of the site, any plans need incorporate enhancements to active travel pedestrian and cycling facilities and encourage a better modal shift by providing a dedicated cycle path on Romsey Road. This is considered to be in line with the Local Cycling and Walking Infrastructure Plan (LCWIP). These improvements are considered to be essential for enhancing the connectivity of the site given that this is such an important employment area.

Any plans for the redevelopment of the site need to ensure that they take into account and maintain access to the sewerage infrastructure and include a sewerage network capacity analysis.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BN4-G/6/W11, ANON-AQTS-3BSY-T/75/W11, ANON-AQTS-3299-G/15/W11, ANON-AQTS-327U-A - Southern Water/30/W11, ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/18/W11, ANON-AQTS-3B8M-K/14/W11, BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/18/W11, BHLF-AQTS-3284-A/15/W11

Post Regulation 19 Actions

Proposed Modification agreed with Southern Water – addition of new criterion to Policy W11 (sewerage network capacity assessment).

Proposed Modifications agreed with Historic England regarding the wording of paragraph 12.120.

Main issues raised in representations received in regulation 19 consultation.

- Essential hospital services are preserved and any plans for redevelopment undertaken in collaboration with the NHS Trust;
- The need to consider on-site energy generation;
- Improvements and enhancement to the active travel routes and encourage a better modal shift; and
- Any redevelopment needs to undertake a sewerage capacity network assessment.

South Hampshire Urban Area Site Allocations

Local Plan Reference	Policy SH1
or document	Newlands (West of Waterlooville)

Total Number of Representations received		7
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	0
Sound	4	1
Complies with Duty to Cooperate	4	1

The majority of representations support this policy, including of addition of new criteria following the draft Local Plan. Several suggestions are made for small changes to the policy, its explanatory text or maps for clarification, particularly in relation to infrastructure and service provision. These include suggested changes by the site promoter, who confirms its deliverability and that there may be capacity for about 400 additional units (instead of 300 estimated).

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/4/SH1, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/3/SH1, ANON-AQTS-32UK-X - Environment Agency/2/SH1,
ANON-AQTS-3B5G-A/1/SH1, ANON-AQTS-327U-A - Southern Water/3/SH1,
BHLF-AQTS-3284-A/2/SH1, BHLF-AQTS-328R-8 - Hampshire County
Council/3/SH1

Post Regulation 19 Actions

 New / amended criteria for Local Plan policy SH1 (page 372) are included in the Proposed Modifications (November 2024) to address comments from the ICB and Natural England, and in response to the updated HRA Addendum.

Main issues raised in representations received in regulation 19 consultation

- Significant support for policy SH1;
- Whether there is a need for clarification and whether the policy includes sufficient detail: and
- Whether the estimated capacity of the site should be increased.

Local Plan Reference or document		No	Policy SH2 rth Whiteley
Total Number of Represe	ntations received		13
Number of respondents v	who confirmed they	Yes	No
Legally Compliant		8	2
Sound		6	5
Complies with Duty to Co	poperate	8	2
Summary of Representat	ions		

The majority of representations support this policy, including of addition of new criteria following the draft Local Plan. There is some objection to the alleged impact on ancient woodland and lack of infrastructure provision, or suggestions that the Plan needs modification so as better to protect or provide these. The site promoter confirms its deliverability and that a planning application for about 90 dwellings will be made shortly (compared to 110 estimated), while seeking clarification of the Plan's explanatory text and map. One representation suggests there is scope for further expansion to the north of Whiteley ('omission' site).

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/91/SH2, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/35/SH2, ANON-AQTS-32UE-R/6/SH2, ANON-AQTS-32UK-X - Environment Agency/18/SH2, ANON-AQTS-32UU-8/9/SH2, ANON-AQTS-327U-A - Southern Water/37/SH2, ANON-AQTS-32ZM-5/4/SH2, ANON-AQTS-3B8M-K/17/SH2, BHLF-AQTS-3266-A - Fareham Borough Council/7/SH2, BHLF-AQTS-329H-Y - Network Rail/7/SH2, BHLF-AQTS-3282-8 - Natural England/15/SH2, BHLF-AQTS-3284-A/19/SH2, BHLF-AQTS-328R-8 - Hampshire County Council/32/SH2

Post Regulation 19 Actions

 Amended criteria for Local Plan policy SH2 (page 378) are included in the Proposed Modifications (November 2024) to address comments from Natural England and in response to the updated HRA Addendum.

Main issues raised in representations received in regulation 19 consultation

- Significant support for policy SH2;
- Whether the impact of the allocation on ancient woodland and infrastructure provision is acceptable and whether there is a need for clarification or further requirements relating to these; and
- Whether the estimated capacity of part of the site should be decreased.

Local Plan Reference or document	Whi	Policy SH3 teley Green
Total Number of Representations received		3
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	0
Sound	2	0
Complies with Duty to Cooperate	2	0

Summary of Representations

The representations on this policy are supportive, including for the addition of new criteria following the draft Local Plan. The site promoter suggests some changes to the policy criteria and explanatory text to reflect the reduced housing capacity of the site or the current situation.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/90/SH3, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/34/SH3, BHLF-AQTS-328R-8 - Hampshire County
Council/31/SH3

Post Regulation 19 Actions

 Changes to Local Plan paragraph 13.31 (page 380) are included in the Proposed Modifications (November 2024) to address comments from Hampshire County Council.

Main issues raised in representations received in regulation 19 consultation

- Support for policy SH3; and
- Whether there is a need for amendments to the criteria of policy SH3 and its explanatory text.

Local Plan Reference or document	Solent Bu	Policy SH4 siness Park
Total Number of Representations received		3
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	1
Sound	1	1
Complies with Duty to Cooperate	1	1

Summary of Representations

Most representations on this policy are supportive. The site promoter suggests a need for a more flexible policy in terms of employment uses, design, etc to attract investment (revised wording suggested).

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BSY-T/3/SH4, ANON-AQTS-32G3-R/1/SH4, BHLF-AQTS-3266-A Fareham Borough Council/1/SH4

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- General support for policy SH4; and
- Whether policy SH4 is too restrictive in terms of employment uses, design, etc.

Local Plan Reference	Policy SH6
or document	Botley Bypass

Total Number of Representations received		3
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	0
Sound	1	2
Complies with Duty to Cooperate	2	1

Some support for policy SH6 but a request that it is more positive than simply reserving the route of the bypass. Also, a request that the policy refers to the need for access to water supply infrastructure.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/13/SH6, ANON-AQTS-32NT-Z/2/SH6, **ANON-AQTS-327U-A-Southern Water/9/SH6**

Post Regulation 19 Actions

 A new criterion for Local Plan policy SH6 (page 384) is included in the Proposed Modifications (November 2024) to address comments from Southern Water.

Main issues raised in representations received in regulation 19 consultation

- Some support for policy SH4; and
- Whether policy SH6 should be more positive about the proposed bypass.

The Market Towns and Rural Area Site Allocations Bishop's Waltham

Local Plan Reference or document	The Vir		Policy BW1 angier Lane
Total Number of Representations received	sentations received 6		
Number of respondents who confirmed they consider the policy is –		Yes	No
Legally Compliant		4	1
Sound		1	4
Complies with Duty to Cooperate		3	2

Summary of Representations

The Parish Council highlighted an error in the policy, which referred to a lapsed policy in the adopted Plan. It was also noted that the footpath and cycleway required under criterion iii has not been completed. Southern Water supported the policy approach to waste water infrastructure. Hampshire County Council advised the potential pupil yield generated by a development of this size. The NHS Hampshire and Isle of Wight ICB requested that the policy highlight the potential need for additional health infrastructure.

One respondent considered there should be further sustainable transport infrastructure to mitigate the impacts of development in Bishop's Waltham. One respondent considered there should be further development in Bishops Waltham, and proposes an extension of BW1 to deliver a further 60 dwellings.

Representation Numbers (Statutory consultees in bold and named)
[ANON-AQTS-3BQ4-K - Bishop's Waltham Parish Council/2/BW1, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/25/BW1, ANON-AQTS-327S-8/2/BW1, ANON-AQTS-327U-A - Southern Water/28/BW1, ANON-AQTS-3B8M-K/12/BW1, BHLF-AQTS-328R-8 - Hampshire County Council/23/BW1]

Post Regulation 19 Actions

A Proposed Modification to Local Plan policy BW1 (page 396) to clarify the position regarding potential infrastructure requirements.

A Proposed Modification to Local Plan Policy BW1 (page 395) to delete reference to an incorrect policy number.

Main issues raised in representations received in regulation 19 consultation

- Whether site BW1 should be extended to deliver additional development;
 and
- Whether the policy adequately addresses potential infrastructure requirements.

Local Plan Reference or document	Policy BW3 Tollgate Sawmill		
Total Number of Representations re	ceived		7
Number of respondents who confirm	ned they	Yes	No
consider the policy is -		_	
Legally Compliant		6	0
Sound		2	4
Complies with Duty to Cooperate		5	1

Summary of Representations

Hampshire County Council advised the potential pupil yield generated by a development of this size. One respondent considered there should be further sustainable transport infrastructure to mitigate the impacts of development in Bishop's Waltham. Two respondents questioned whether this site will come forward, given it has been allocated for some time, and proposed alternatives. The South Downs National Park Authority requested that the policy protects the setting of the National Park.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BQ4-K - Bishop's Waltham Parish Council/3/BW3, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/32/BW3, ANON-AQTS-

327S-8/3/BW3, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/15/BW3, ANON-AQTS-329Q-8/36/BW3, ANON-AQTS-3B8M-K/16/BW3, BHLF-AQTS-328R-8 - Hampshire County Council/30/BW3

Post Regulation 19 Actions

A Proposed Modification to Local Plan Policy BW3 (page 4005) to highlight the need to protect the setting of the National Park.

Modification to Local Plan policies map is proposed to include the boundary of the South Downs National Park in the allocation and inset maps in response to comments by SDNPA.

Main issues raised in representations received in regulation 19 consultation

- Whether the site will come forward; and
- The setting of the National Park.

Local Plan Reference or document	Land	d North of Rar	Policy BW4 eridge Lane
Total Number of Representations received	I		36
Number of respondents who confirmed the consider the policy is –	еу	Yes	No
Legally Compliant		19	16
Sound		3	32
Complies with Duty to Cooperate	_	17	18

Summary of Representations

The responses, primarily focus on sustainability, biodiversity, infrastructure, transport and community consultation. 78% of respondents are worried about biodiversity loss due to the development of woodland, impacting sustainable development goals. Doubts were expressed about achieving a 10% biodiversity net gain. The proposed housing design raises concerns about ecological disruption and drainage problems.

There were concerns about local infrastructure pressure, including traffic and inadequate public services, were raised by 44% of participants. 28% of respondents considered the community engagement process as inadequate, suggesting poor public involvement and inadequate communication throughout the consultation.

The South Downs National Park Authority referred to their Statement of Common Ground with the City Council.

Some respondents identified alternative sites they considered more suitable. Hampshire county Council sought changes to the wording on transport matters, and advised of the likely pupil yield from this development.

Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BN6-J/1/BW4, ANON-AQTS-3BFM-1/1/BW4, ANON-AQTS-3BF4-8/1/BW4, ANON-AQTS-3BHV-C/1/BW4, ANON-AQTS-3BEN-1/1/BW4, ANON-

AQTS-3BEK-X/1/BW4, ANON-AQTS-3BQ4-K - Bishop's Waltham Parish Council/1/BW4, ANON-AQTS-3BRH-8/1/BW4, ANON-AQTS-3BPC-1/1/BW4, ANON-AQTS-3BP7-N/1/BW4, ANON-AQTS-3B4V-R/1/BW4, ANON-AQTS-3B5W-T/1/BW4, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/9/BW4, ANON-AQTS-3BXP-P/1/BW4, ANON-AQTS-3BBE-N/1/BW4, ANON-AQTS-327S-8/1/BW4, ANON-AQTS-327D-S/1/BW4, ANON-AQTS-32C4-N/1/BW4, ANON-AQTS-327D-S/1/BW4, ANON-AQTS-32C4-N/1/BW4, ANON-AQTS-3B54-Q/1/BW4, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/4/BW4, ANON-AQTS-32DS-N/1/BW4, ANON-AQTS-32M8-3/1/BW4, ANON-AQTS-32MC-E/1/BW4, ANON-AQTS-32ZP-8/1/BW4, ANON-AQTS-32ZG-Y/1/BW4, ANON-AQTS-32Z4-C/1/BW4, ANON-AQTS-32K1-T/1/BW4, ANON-AQTS-32KY-2/1/BW4, ANON-AQTS-32A6-N/1/BW4, ANON-AQTS-3B8M-K/3/BW4, ANON-AQTS-32HK-H/1/BW4, BHLF-AQTS-32EY-V/2/BW4, BHLF-AQTS-3289-F/1/BW4, BHLF-AQTS-328R-8 - Hampshire County Council/6/BW4

Post Regulation 19 Actions

A Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps in response to comments by SDNPA.

A Proposed Modification to criterion vii Policy BW4 to clarify how traffic impacts will be considered and managed.

Main issues raised in representations received in regulation 19 consultation

- Whether the wording regarding any vehicular access via Byron Close is appropriate;
- The potential flooding and ecological impacts, including the loos of tress and wildlife;
- The suitability of proposed access arrangements, including the policy wording about achieving a speed reduction in Hoe Road;
- Potential impact upon South Downs National Park and nearby local nature reserves and SSSI; and
- Impacts upon biodiversity and how Biodiversity Newt Gain will be achieved.
- Whether alternative sites in Bishops Waltham are more suitable.

New Alresford

Local Plan Reference or document		Policy NA1 The Dean
Total Number of Repres	entations received	5

Number of respondents who confirmed they	Yes	No
consider the policy is -		
Legally Compliant	3	1
Sound	2	2
Complies with Duty to Cooperate	3	1

A key concern that was raised by the respondents is the inadequacy of current policies in securing necessary developer contributions for infrastructure and community services. Concerns were expressed regarding the challenges of increased traffic and the need for clear guidelines on infrastructure improvements which potentially put at risks cyclists at key junctions.

There is also the need to align any new development with adequate sewerage infrastructure in order to prevent flooding. New housing developments will create additional demands on educational facilities/GP facilities.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/11/NA1, ANON-AQTS-327U-A - Southern Water/12/NA1, ANON-AQTS-3BPD-2/2/NA1, BHLF-AQTS-3284-A/5/NA1, BHLF-AQTS-328R-8 - Hampshire County Council/7/NA1

Post Regulation 19 Actions

Proposed Modification in response the HIOW ICB representation regarding criterion xi on infrastructure.

Main issues raised in representations received in regulation 19 consultation

- The need to secure developer contributions towards infrastructure and community services;
- The need to address the increase traffic and the safety of cyclists; and
- The additional demands that any new housing development will put on services and facilities.

Local Plan Reference or document			Policy NA2 Sun Lane
Total Number of Represen	tations received		6
Number of respondents w consider the policy is –	ho confirmed they	Yes	No
Legally Compliant		5	0
Sound		2	3
Complies with Duty to Cod	perate	3	1
Summary of Representation	ons		_

Approximately half the comments refer to inconsistencies in policies related to sustainable transport. There are calls for more explicit guidelines needed on

cycling and walking pathways and their alignment with national policies, as well as better integration with bus services to support sustainable travel.

Environmental concerns were raised especially potential groundwater risks of the burial ground at Sun Lane on groundwater from the Environment Agency.

Integration with existing infrastructure is highlighted, with a need for better coordination in delivering sewerage services to support new developments. Public transport support and community services enhancements are needed, with more detailed requirements for cycling and walking infrastructure.

Educational infrastructure will need to be expanded in order to accommodate new housing impacts.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/26/NA2, ANON-AQTS-32UK-X - Environment Agency/16/NA2, ANON-AQTS-327U-A - Southern Water/29/NA2, ANON-AQTS-3B8M-K/13/NA2, BHLF-AQTS-3284-A/14/NA2, BHLF-AQTS-328R-8 - Hampshire County Council/24/NA2

Post Regulation 19 Actions

Proposed Modification in response the HIOW ICB representation regarding criterion xvi on infrastructure.

Proposed Modification agreed with the Environment Agency in relation to criterion xiv (ground water risk assessment for the burial ground).

Main issues raised in representations received in regulation 19 consultation

- More explicit guidelines needed on cycling and walking pathways and their alignment with national policies, as well as better integration with bus services to support sustainable travel;
- Environmental concerns, especially potential groundwater risks from developments such as burial grounds from the Environment Agency;
- Need a need for better coordination in delivering sewerage services to support new developments; and
- Public transport support and community services enhancements are needed along with the need for the expansion of educational facilities.

Local Plan Reference or document	Policy NA3 Neighbourhood Plan Designated Area		
Total Number of Repres	resentations received 6		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		5	1
Sound		2	4
Complies with Duty to C	Cooperate	3	3
Summary of Representa	itions		

Concerns were raised around housing allocations site deliverability and maintaining a five-year housing supply and how this would work with the 2030 phasing policy.

Comments were raised about the importance of coordinating with utility providers in order to align new developments with the delivery of infrastructure. There was also need for Local Green Space designations, and concerns were raised about the arbitrary housing figures, and the implications of a Market Town like New Alresford potentially reaching its development limits.

The importance of preserving the cultural and historical identity of areas such as Bishop's Sutton, safeguarding their unique characteristics against the impact of new developments on this gap were also raised. Comments were made that it is important to ensure that heritage and social aspects are fully considered in plans for additional housing in New Alresford.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BTZ-V - Bishop's Sutton Parish Council/1/NA3, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/21/NA3, ANON-AQTS-327U-A - Southern Water/25/NA3, ANON-AQTS-32FT-R - New Alresford Town Council/9/NA3, ANON-AQTS-322Q-1/3/NA3, BHLF-AQTS-328X-E/16/NA3

Post Regulation 19 Actions

Proposed Modification in response the HIOW ICB representation regarding criterion ii of Policy NA3.

Main issues raised in representations received in regulation 19 consultation

- Maintaining a five-year housing supply and how this would work with the 2030 phasing policy;
- The importance of coordinating with utility providers to align new developments with existing infrastructure;
- Concerns about the arbitrary housing figures, and the implications of a Market Town like New Alresford potentially reaching its development limits;
- The importance of preserving the cultural and historical identity of areas such as Bishop's Sutton, safeguarding their unique characteristics against the impact of new developments on this gap; and
- Ensuring that heritage and social aspects are fully considered in plans for additional housing in New Alresford.

Colden Common

Local Plan Reference or document		Policy CC1 Clayfield Park
Total Number of Repres	entations received	7

Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	1
Sound	2	4
Complies with Duty to Cooperate	4	0

The Local Education Authority raises the issue of a possible need for additional primary and secondary education places, depending on the nature of the development.

The statutory water and drainage supplier – Southern Water, support the inclusion of criteria to protect the groundwater SPZ, but suggest inclusion in supporting text of wording requiring developers to consult with the Environment Agency on the protection of the water supply source.

There is a necessity for infrastructural improvements, such as footpath upgrades to support community connectivity. There are outstanding infrastructure funding issues in relation to highways issues related to Colden Common.

The continued allocation of Clayfield Park was questioned given concerns regarding its deliverability and its relatively poor performance in sustainability assessments. The council's rationale for allocating the site was questioned.

Alternative site suggested that performs better on sustainability criteria and is considered more likely to be deliverable.

Representation Numbers (Statutory consultees in bold and named)
[ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/14/CC1, ANON-AQTS-32CD-5 - Colden Common Parish Council/24/CC1, ANON-AQTS-329Q-8/17/CC1, ANON-AQTS-327U-A - Southern Water/17/CC1, BHLF-AQTS-328R-8 - Hampshire County Council/12/CC1, BHLF-AQTS-32Q1-Z/2/CC1, BHLF-AQTS-32Q8-7/2/CC1]

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

- Education places;
- Water supply;
- Infrastructure improvements, e.g. footpaths; and
- Appropriateness of site selection.

Local Plan Reference or document		Policy CC2 Colden Common Farm
Total Number of Represe	entations received	5

Number of respondents who confirmed they	Yes	No
consider the policy is -		
Legally Compliant	4	1
Sound	2	3
Complies with Duty to Cooperate	3	2

There is support from the South Downs National Park for the criteria viii) about the relationship with, views from, and provision of landscape buffers to, the SDNP. The SDNP seek inclusion of reference to the setting of the park in the policy and that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans to assist with understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.

The Local Education Authority raises the issue of a possible need for additional primary and secondary education places, depending on the nature of the development.

The statutory water and drainage supplier – Southern Water, support the inclusion of criteria to protect the groundwater SPZ and access to existing water infrastructure. Specific details are sought in respect of the size of easements. The need for developers to consult with the Environment Agency on the protection of the water supply source is also emphasized.

There is a necessity for infrastructure improvements, such as footpath upgrades to support community connectivity, so there is support for criteria iv) that requires a link to the adjacent Sandyfields development and suggestion of upgrades to existing rights of way. There are outstanding infrastructure funding issues in relation to highways issues related to Colden Common.

There was concern that Colden Common has poor public transport provision and it was suggested that the transport assessment in the evidence base is out of date.

There was also concern regarding the phasing restriction on the development of the site until after 2030, which was seen to be unreasonable given concerns regarding the delivery of Claylands Park CC1 allocation and not aligned with national policy aims to significantly increase the delivery of housing.

Representation Numbers (Statutory consultees in bold and named)
[ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/22/CC2, ANON-AQTS-32CD-5 - Colden Common Parish Council/39/CC2, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/12/CC2, ANON-AQTS-32NP-V/2/CC2, ANON-AQTS-327U-A - Southern Water/26/CC2]

Post Regulation 19 Actions

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps.

Proposed Modification to criterion vii to Policy CC2 in respect of the capacity of the site in response to comments from Historic England.

Main issues raised in representations received in regulation 19 consultation

- Relationship with South Downs National Park
- Education places
- Water supply, sewage and drainage
- Evidence on public transport
- Infrastructure improvements, eg footpaths
- Phasing of development

Local Plan Reference or document	Policy CC3 Land at Main Road		
Total Number of Repres	entations received		6
Number of respondents consider the policy is –			
Legally Compliant		3	1
Sound		2	4
Complies with Duty to C	ooperate	3	1

There is support from the South Downs National Park for the criteria ii) and viii) about the relationship with, views from, and provision of landscape buffers to, the SDNP. The SDNP seek inclusion of reference to the setting of the park in the policy and that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans to assist with understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.

The Local Education Authority raises the issue of a possible need for additional primary and secondary education places, depending on the nature of the development.

The statutory water and drainage supplier – Southern Water, support the inclusion of criteria to protect the groundwater SPZ. The need for developers to consult with the Environment Agency on the protection of the water supply source is also emphasized.

There was concern that Colden Common has poor public transport provision and it was suggested that the transport assessment in the evidence base is out of date.

There was concern regarding the phasing restriction on the development of the site until after 2030, which was seen to be unreasonable, delaying the delivery of affordable housing and not aligned with national policy aims to significantly increase the delivery of housing.

Representation Numbers (Statutory consultees in bold and named)
[ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/5/CC3, ANON-AQTS-32CD-5 - Colden Common Parish Council/4/CC3, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/3/CC3, ANON-AQTS-327U-A

- **Southern Water/6/CC3**, BHLF-AQTS-32Q1-Z/1/CC3, BHLF-AQTS-32Q8-7/1/CC3]

Post Regulation 19 Actions

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps.

Main issues raised in representations received in regulation 19 consultation

- Relationship with South Downs National Park
- Education places
- Water supply, sewage and drainage
- Evidence on public transport
- Infrastructure improvements
- Phasing of development

Local Plan Reference or document	Lan	d adjoining 85 (Policy CC4 Church Lane
Total Number of Represe	esentations received 5		
Number of respondents v			
Legally Compliant		4	1
Sound		3	2
Complies with Duty to Co	ooperate	4	1

Summary of Representations

The Local Education Authority raises the issue of a possible need for additional primary and secondary education places, depending on the nature of the development.

The statutory water and drainage supplier – Southern Water, support the inclusion of criteria to protect the groundwater SPZ and the need for developers to consult with the Environment Agency on the protection of the water supply source is also emphasized.

The Environment Agency have raised the issue of the importance of liaison with Southern Water on this site due to the proposed new water supply pipeline in the vicinity, however, Southern Water state that the route of the new water supply pipeline will now not affect site CC4.

There was concern that Colden Common has poor public transport provision and it was suggested that the transport assessment in the evidence base is out of date.

There was concern regarding the phasing restriction on the development of the site until after 2030, which was seen to be unreasonable, delaying the delivery of affordable housing and not aligned with national policy aims to significantly increase the delivery of housing.

Representation Numbers (Statutory consultees in bold and named)
[ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/7/CC4, ANON-AQTS-32CD-5 - Colden Common Parish Council/13/CC4, ANON-AQTS-32UK-X - Environment Agency/7/CC4, ANON-AQTS-327U-A - Southern
Water/11/CC4, ANON-AQTS-32MY-4/1/CC4]

Post Regulation 19 Actions

Proposed Modification to criterion viii of Policy CC4 and to the text at paragraph 14.80 in respect of new water pipeline infrastructure in response to the Southern Water representation.

Main issues raised in representations received in regulation 19 consultation

- Education places
- Water supply, sewage and drainage
- Evidence on public transport
- Infrastructure improvements
- Phasing of development

Denmead

Local Plan Reference or document	Policy DEN1 Neighbourhood Plan Designation Area		
Total Number of Represe	esentations received 11		
Number of respondents consider the policy is –			
Legally Compliant		5	3
Sound		0	9
Complies with Duty to C	ooperate	2	6

Summary of Representations

Whilst there is some support for Policy DEN1 there is concern the '100' dwellings is not justified and not based on the consideration of reasonable alternatives, given its categorisation as a larger rural settlement in the settlement hierarchy. This is expressed in terms of the fact Denmead does not have the heritage constraints found in many other rural settlements and has ample room to consolidate its growth whilst avoiding the gap with Waterlooville.

There is a request that the 100 should be increased to at least 200 if not more.

Some representations refer to the need to prioritise brownfield land and to allocate smaller deliverable sites to provide a more flexible and resilient housing strategy, there is also criticism that there is an over reliance on windfall provision. Given the location of Denmead at the south of the District this could contribute to meeting the unmet need from neighbouring authorities such as Portsmouth and Havant.

Southern Water specifically request to be consulted on the sites allocated within the updated Denmead Neighbourhood Plan for capacity assessments to be completed on their wastewater network.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BCM-X/3.0/DEN1, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/38.0/DEN1, ANON-AQTS-329G-X/1.0/DEN1, ANON-AQTS-329E-V/7.0/DEN1, ANON-AQTS-3BRU-N/2.0/DEN1, ANON-AQTS-32NG-K/1.0/DEN1, ANON-AQTS-327U-A - Southern Water/39.0/DEN1, BHLF-AQTS-326Y-D/4.0/DEN1, BHLF-AQTS-328D-T/5.0/DEN1, BHLF-AQTS-3287-D/4.0/DEN1, BHLF-AQTS-328R-8 - Hampshire County Council/36.0/DEN1

Post Regulation 19 Actions

Proposed modifications to criterion ii in response to representations from ICB (criterion ii of Policy DEN1) and new paragraph to supporting text to reflect comments by Southern Water (new paragraph 14.86a).

Main issues raised in representations received in regulation 19 consultation

- Need to reconsider the quantum of development allocated to Denmead;
 given its categorisation as a larger rural settlement;
- Infrastructure capacity to accommodate new development; and
- Over reliance on brownfield and windfall sites as sources of housing supply.

Kings Worthy

Local Plan Reference or document	Policy KW1 Cornerways & Merrydale	
Total Number of Representations received		4
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	0
Sound	2	1
Complies with Duty to Cooperate	3	0

Summary of Representations

Most representations on this policy are supportive, including of new criteria added following the draft Local Plan. One comment suggests a need for a general housing allocation in Kings Worthy (as opposed to older persons' housing) and another highlights the possible impact on educational provision.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/23/KW1, ANON-AQTS-32TT-6/3/KW1, ANON-AQTS-327U-A - Southern Water/27/KW1, BHLF-AQTS-328R-8 - Hampshire County Council/19/KW1

Post Regulation 19 Actions

None

Main issues raised in representations received in regulation 19 consultation

General support for policy KW1.

Local Plan Reference or document	Policy KW2 Land adjoining the Cart & Horses PH		
Total Number of Repres	entations received		10
Number of respondents who confirmed they Yes N consider the policy is –			No
Legally Compliant		7	2
Sound		4	5
Complies with Duty to C	ooperate	6	3

Summary of Representations

There is significant support for this policy, including of addition of new criteria following the draft Local Plan. There are also significant concerns, primarily about the loss of / impact on woodland, biodiversity and use of a greenfield site. Some respondents suggest the Plan needs to be clearer about the location of development / retained woodland / greenspace, or about the proximity of the South Downs National Park and the Itchen SAC. The site promoter supports the allocation but promotes an increase in the estimated site capacity.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BJK-3/1/KW2, ANON-AQTS-3B56-S - NHS Hampshire and Isle
of Wight ICB/18/KW2, ANON-AQTS-3BBQ-1/1/KW2, ANON-AQTS-329Z-H South Downs National Park Authority (SDNPA)/9/KW2, ANON-AQTS-32UMZ/5/KW2, ANON-AQTS-327U-A - Southern Water/22/KW2, ANON-AQTS-32DWS/1/KW2, BHLF-AQTS-3282-8 - Natural England/12/KW2, BHLF-AQTS-3284A/12/KW2, BHLF-AQTS-328R-8 - Hampshire County Council/16/KW2

Post Regulation 19 Actions

Minor Proposed Modifications to Local Plan paragraph 14.95 (page 444) to address comments from Historic England.

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps in response to comments by SDNPA.

Main issues raised in representations received in regulation 19 consultation

- Significant support for policy KW1;
- Whether the impact of the allocation on woodland, biodiversity, etc is acceptable and whether the policy includes sufficient detail;
- Whether the estimated capacity of the site should be increased.

Swanmore

Local Plan Reference or document	Policy SW1 The Lakes	
Total Number of Representations received		4
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	1
Sound	1	2
Complies with Duty to Cooperate	2	1

Summary of Representations

The local education authority raised concerns that the development would cause a need for additional education places. Contributions towards all phases of education may be required.

The local water and sewage supplier - Southern Water – supported the criteria requiring the alignment of the delivery of housing with that of sewage infrastructure and the criteria allowing for future access for maintenance and upsizing of sewage infrastructure. However, they are also seeking specific requirements for easement sizes each side of pipe infrastructure.

There was both disagreement with and support for, the revised hierarchy and consequential recategorization of Swanmore as a Large Rural Settlement. There was disagreement locally with the methodology of the hierarchy review. There was criticism of the scoring for some criteria of facilities and services and comparisons were made with the scoring in the hierarchy for other settlements, with alleged inconsistencies in application and in-appropriate weighting. There was also local support for not allocating a SHELAA site at Reg 18 stage, citing its presence within the settlement gap and that an additional site is not required for the amount of housing allocated for Swanmore. There were also local concerns regarding that potential site development related to flooding/drainage, road safety, ecological and biodiversity concerns and the health risks associated with proximity to high voltage pylons.

However, one respondent considered the re-assessment of Swanmore since Reg 18 was an appropriate reflection of its range of services and facilities. They considered Swanmore to be a sustainable settlement for new housing.

This respondent suggested that there is a need to increase the amount of development in the MTRA to ensure that the rural settlements maintain their vitality and viability. Therefore, additional allocations should be considered, notwithstanding that existing allocations have not yet been completed.

Furthermore, this respondent disagreed with the findings of The Settlement Gap Review (July 2024) and asserted that the allocation of SW1 shows that the principle of development within the gap (away from sensitive SDNP) is acceptable. A site to the north of Swanmore within the gap would not conflict with the identified important features of the gap and should be considered for development

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-32TA-K/3/SW1, ANON-AQTS-327U-A - Southern Water/33/SW1, ANON-AQTS-32NN-T - Swanmore Parish Council/1/SW1, BHLF-AQTS-328R-8 - Hampshire County Council/26/SW1

Post Regulation 19 Actions

Proposed Modification to criterion vii to Policy SW1 in respect of health and wellbeing infrastructure in response to the HIOW ICB representation.

Main issues raised in representations received in regulation 19 consultation

- Settlement hierarchy position of Swanmore and appropriateness of amount of housing allocated;
- Evidence base hierarchy review;
- Evidence base settlement gap review;
- Education provision; and
- Sewage infrastructure provision.

Wickham

Local Plan Reference	Policy WK1		
or document	Winchester Road Housing Al	location and (Open Space Allocation
Total Number of Repres	esentations received 9		
Number of respondents consider the policy is –			No
Legally Compliant		6	1
Sound		2	6
Complies with Duty to C	Cooperate	5	3

Summary of Representations

Respondents questioned the retention of this policy given that the housing element has been delivered. The proposed open space also features prominently, with 33% of respondents opposing the proposed sports facilities, suggesting these are financially unsustainable and not meeting local demand. Instead, there is a preference for an alternative such as a country park, that aligns better with financial and community priorities. Hampshire County Council highlighted the potential pupil yield from this level of development. The South Downs National Park Authority sought measures to protect the setting of the Park. The NHS ICB sought a further amendment to ensure any necessary contributions to infrastructure were considered.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B6N-J/6/WK1, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/30/WK1, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/14/WK1, ANON-AQTS-3BX6-V/4/WK1, ANON-AQTS-327U-A - Southern Water/35/WK1, ANON-AQTS-32DN-G/3/WK1, BHLF-AQTS-3281-7 - Wickham and Knowle Parish Council/2/WK1, BHLF-AQTS-328T-A/3/WK1, BHLF-AQTS-328R-8 - Hampshire County Council/28/WK1

Post Regulation 19 Actions

Proposed Modification to table "Wickham Housing Sources" (page 453) to recognise removal of Policy WK2.

Proposed Modifications to Local Plan policy WK1 (page 457) and supporting paragraphs 14.110 to 14.112 to update the position on the delivery of open space and protect the setting of the South Downs National Park.

Modification to Local Plan policies map is proposed to include the boundary of the South Downs National Park in the allocation and inset maps.

Main issues raised in representations received in regulation 19 consultation

• Whether the policy should be amended in response to ongoing discussions regarding the deliverability of sports pitches and pavilion.

Local Plan Reference or document	Policy WK Welborne Open Spac
Total Number of Representations received	d 1:
Number of respondents who confirmed the consider the policy is –	ney Yes No
Legally Compliant	6
Sound	5
Complies with Duty to Cooperate	7

Summary of Representations

A number of respondents supported the principle of the retention of open space, given the allocation of Welborne for about 6,000 homes immediately to the south in Fareham Borough. One respondent considered Welborne should be shown on the policies map.

Others objected to the policy, stating it was duplication of NE7, undeliverable, or inappropriate given the existing mixture of agricultural uses with the designated area.

Others promoted sites for development within this area, or raised concerns about the prospect.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B6N-J/1/WK3, ANON-AQTS-3B56-S - NHS Hampshire and Isle
of Wight ICB/4/WK3, ANON-AQTS-3278-D/1/WK3, ANON-AQTS-32CU-P/1/WK3,
ANON-AQTS-3BX6-V/1/WK3, ANON-AQTS-32T1-3/1/WK3, ANON-AQTS-327U-A
- Southern Water/5/WK3, ANON-AQTS-32DN-G/1/WK3, BHLF-AQTS-3266-A -

Fareham Borough Council/2/WK3, BHLF-AQTS-32YJ-1/1/WK3, BHLF-AQTS-328T-A/1/WK3, BHLF-AQTS-328W-D/1/WK3

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

- The suitability of the additional or alternative housing site proposed for Wickham within this area; and
- Whether this policy is necessary and appropriate given the area's identification as a Settlement Gap under NE7 and existing agricultural uses.

Local Plan Reference or document	Policy WK5 Land at Mill Lane	
Total Number of Representations received		17
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	12	2
Sound	6	9
Complies with Duty to Cooperate	12	3

Summary of Representations

Respondents including Wickham and Knowle Parish Council, argue the decision-making process lacked adequate public consultation and transparency. Other respondents considered it a suitable option if development in Wickham is required. Alternative development sites were proposed.

Concerns were raised about transport impacts, in particular congestion and the availability of parking in the locality.

The site promoter has advocated the expansion of the allocation to include land to the north of the proposal for a larger scheme of around 100 homes. Objections were raised regarding the proposals for phasing the development, and securing pedestrian links and the treatment of the existing surface water overland flow route.

The South Downs National Park Authority sought changes to ensure the setting of the SDNP is protected. Hampshire County Council advised the expected pupil yield from a development of this size.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B6N-J/3/WK5, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/20/WK5, ANON-AQTS-3278-D/2/WK5, ANON-AQTS-32CU-P/3/WK5, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/11/WK5, ANON-AQTS-3BX6-V/2/WK5, ANON-AQTS-32UH-U/1/WK5, ANON-AQTS-329Q-8/31/WK5, ANON-AQTS-32DN-G/2/WK5, ANON-AQTS-32MZ-5/1/WK5, ANON-AQTS-322W-7/1/WK5, BHLF-AQTS-3281-7 - Wickham and Knowle Parish Council/1/WK5, BHLF-AQTS-328E-U/1/WK5, BHLF-AQTS-

328T-A/2/WK5, BHLF-AQTS-328C-S/1/WK5, BHLF-AQTS-328W-D/2/WK5, BHLF-AQTS-328R-8 - Hampshire County Council/18/WK5

Post Regulation 19 Actions

- Proposed Modification to Local Plan policies map is to include the boundary of the South Downs National Park in the allocation and inset maps;
- Modifications proposed to criterion v of Policy WK5 (page 463) and para.
 14.119 to retain flexibility in how suitable pedestrian links may be delivered.

Main issues raised in representations received in regulation 19 consultation

- The need for this development given the nearby proposals for 6000 homes at Welborne, and the City Council's previous approach in the Regulation 18 Plan that that development in Knowle was an acceptable development strategy;
- Whether the proposed vehicular access via Mill Lane is acceptable, and if the proposed approach to securing pedestrian links is appropriate;
- Whether alternative sites in Wickham would be more appropriate.
- Whether the site should be expanded to the north to increase capacity to around 100 homes;
- Whether the policy should be amended to ensure the setting of the SDNP is protected; and
- Lack of opportunity for consultation prior to the publication of the regulation 19 Plan.

Local Plan Reference or document	Land at Sou	thwick Road/S	Policy WK6 School Road
Total Number of Represe	esentations received 17		
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		10	1
Sound		6	6
Complies with Duty to C	ooperate	9	3

Summary of Representations

Respondents including Wickham and Knowle Parish Council argue the decision-making process lacked adequate public consultation and transparency. Other respondents considered it a suitable option if development in Wickham is required. Some objectors considered this preferable to the other proposed allocation at WK5. Alternative development sites were proposed.

The site promoter has confirmed the deliverability of the proposal and proposed that this proposal could come forward earlier than 2030, with a larger scheme coming forward later in the Plan period.

One respondent pointed out the reference to Southwick Road was inaccurate and misleading. One respondent considered the site poorly related to the settlement and subject to archaeological constraints.

The South Downs National Park Authority sought changes to ensure the setting of the SDNP is protected. Hampshire County Council advised the expected pupil yield from a development of this size. Southern Water advised they have infrastructure which crosses the site and requested an amendment to the plan to ensure this is taken into account if the site is developed.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BJQ-9/1/WK6, ANON-AQTS-3B6N-J/7/WK6, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/36/WK6, ANON-AQTS-3278-D/4/WK6, ANON-AQTS-32CU-P/5/WK6, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/16/WK6, ANON-AQTS-3BX6-V/5/WK6, ANON-AQTS-327U-A - Southern Water/38/WK6, ANON-AQTS-32DN-G/4/WK6, BHLF-AQTS-32YC-T/1/WK6, BHLF-AQTS-3281-7 - Wickham and Knowle Parish Council/3/WK6, BHLF-AQTS-328E-U/2/WK6, BHLF-AQTS-328T-A/4/WK6, BHLF-AQTS-328C-S/2/WK6, BHLF-AQTS-328A-Q/7/WK6, BHLF-AQTS-328W-D/5/WK6, BHLF-AQTS-328R-8 - Hampshire County Council/33/WK6

Post Regulation 19 Actions

Modification to Local Plan proposed to rename site Land at School Road, to clarify the location of the proposed development.

Modification to Local Plan policies map is proposed to include the boundary of the South Downs National Park in the allocation and inset maps.

Modification proposed to Policy WK6 criterion vi. to highlight the need to protect the setting of the National Park.

Modification proposed to Policy WK6 to add new criterion to ensure the development makes suitable provision for access to existing waste water infrastructure.

Modification proposed to paragraph 14.126 of the Plan to in response to postconsultation comments received from Historic England to recognise the potential archaeological considerations and set out how they are to be addressed.

Main issues raised in representations received in regulation 19 consultation

- The need for this development given the nearby proposals for 6000 homes at Welborne, and the City Council's previous approach in the Regulation 18 Plan that that development in Knowle was an acceptable development strategy;
- Whether alternative sites in Wickham would be more appropriate;
- Whether the site should be expanded to increase capacity;
- Whether the policy should be amended to ensure the setting of the SDNP is protected;

- Whether archaeological value is protected;
- Whether the policy take appropriate account of waste water infrastructure;
- Lack of opportunity for consultation prior to the publication of the regulation 19 Plan.

Local Plan Reference or document	F	Policy KN1 Ravenswood
Total Number of Representations received		10
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	8	0
Sound	7	1
Complies with Duty to Cooperate	8	0

Some respondents considered the site preferable to alternatives. Two considered this should development should be the last to be considered in the gap. One questioned the deliverability of the site, given the time since a planning application was submitted. Hampshire County Council provided an estimate of pupil yields and stated a contribution towards expansion of all phases of education may be required.

The site promoter confirmed delivery of the site, but sought amendments to the plan criteria concerning education contributions, managing water infrastructure and access.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B6N-J/5/KN1, ANON-AQTS-3B56-S - NHS Hampshire and Isle
of Wight ICB/28/KN1, ANON-AQTS-3278-D/3/KN1, ANON-AQTS-32CU-P/4/KN1,
ANON-AQTS-3BX6-V/3/KN1, ANON-AQTS-329Q-8/35/KN1, ANON-AQTS-32TDP - Homes England/1/KN1, ANON-AQTS-327U-A - Southern Water/32/KN1,
BHLF-AQTS-3266-A - Fareham Borough Council/6/KN1, BHLF-AQTS-328R-8 Hampshire County Council/25/KN1

Post Regulation 19 Actions

Modification proposed to Local Plan Policy KN1 (page 472) to add new criterion to address potential impacts of development on European sites.

Modification proposed to Local Plan Policy KN1 (page 472) to provide flexibility with how connections to waste water and water supply are delivered.

Modification proposed to delete para. 14.141 following update from Southern Water that their proposed water supply pipeline will not go through the site.

Main issues raised in representations received in regulation 19 consultation

The approach to address potential impact on European Sites; and

The approach to waste water and water supply.

Hursley

Local Plan Reference or document	Policy HU1 Neighbourhood Plan Designation Area		
Total Number of Represer	ntations received		4
Number of respondents w	ho confirmed they	Yes	No
Legally Compliant		2	1
Sound		2	1
Complies with Duty to Co	operate	3	0

Summary of Representations

One of the representators suggested that Hursley must be treated in a similar manner that is consistent with other settlements of a similar size. In their view, the settlement should have a housing target that is in addition to the 20 dwelling windfall figure. Based on other settlements it was considered that Hursley could accommodate around 60 dwellings.

The Parish Council have confirmed that they are in the process of developing its Neighbourhood Plan and they are largely supportive of the 20 new homes over the life of the plan. In terms of education, this is likely to be accommodated within existing schools.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BQ5-M/1/HU1, ANON-AQTS-3B6N-J/4/HU1, BHLF-AQTS-32EU-R
- Hursley Parish Council/3/HU1, BHLF-AQTS-328R-8 - Hampshire County
Council/20/HU1

Post Regulation 19 Actions

None.

Main issues raised in representations received in regulation 19 consultation

- Whether Hursley should be treated in a similar manner that is consistent with other settlements of a similar size;
- The Parish Council have confirmed that they are in the process of developing a Neighbourhood Plan and they are largely supportive of the 20 new homes over the life of the plan; and
- The need for education is likely to be accommodated within existing schools.

Otterbourne

Local Plan Reference Policy OT01

or document		Land East o	f Main Road
Total Number of Represer	ntations received		11
Number of respondents w consider the policy is –	ho confirmed they	Yes	No
Legally Compliant		8	0
Sound		4	5
Complies with Duty to Co	operate	8	0

Responses revealed several key focus areas around Policy OT01 regarding housing strategy and local development in Otterbourne, aiming to balance new housing provision with local community needs and environmental sustainability.

There is a strong demand from respondents for more flexible policies to better allocate housing lands and address infrastructure challenges, such as sewerage and water networks, to support increased populations without compromising environmental integrity. Respondents highlight Otterbourne's capacity for sustainable growth, given its existing infrastructure but also raises concerns about current housing targets and the lack of specific site allocations. There is notable emphasis on protecting cultural and environmental assets alongside development, with particular attention on preserving open spaces and the ancient footpath. Some responses stated that the land at Park Farm, Land at Kiln Lane (OT03) scored the same as land at Main Road and they suggest that this site should also be allocated along with the site chosen for development in the Local Plan.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3B44-P - Otterbourne Parish Council/1/OT01, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/2/OT01, ANON-AQTS-32CB-3/1/OT01, ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/1/OT01, ANON-AQTS-329R-9/1/OT01, ANON-AQTS-329U-C/1/OT01, ANON-AQTS-32U8-B - Historic England/1/OT01, ANON-AQTS-327U-A - Southern Water/2/OT01, BHLF-AQTS-328Q-7/1/OT01, BHLF-AQTS-328P-6/1/OT01, BHLF-AQTS-328R-8 - Hampshire Council/2/OT01

Post Regulation 19 Actions

Proposed Modification agreed with Historic England regarding new criterion ix in policy (relating to archaeology and heritage).

Proposed Modification agreed with Historic England new para between 14.156 and 14.157 (relating to an archaeological assessment).

Proposed Modification to Local Plan policies map is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps.

Main issues raised in representations received in regulation 19 consultation

- Respondents raised concerns around the high windfall allowance and insufficient affordable housing provisions;
- Support for the settlement boundary is accepted for developable areas, specific site allocations are suggested to better meet housing needs;
- Support for the site from respondents due to the safe and good access to Main Road and close to the school;
- Infrastructure concerns were raised and responses asked for phased development to align with demands on sewerage, water networks, and flood prevention;
- Concerns were raised over phasing strategies that delay development beyond 2030, potentially limiting the use of greenfield sites. Suggestions include reassessing high windfall allowances in favour of specific site allocations to better meet housing needs;
- Responses stated that development should respect the local cultural landscape and maintain buffers near South Downs National Park, with flexibility in policies to support housing delivery needs effectively; and
- Some responses stated that the land at Park Farm, Land at Kiln Lane (OT03) scored the same as land at Main Road and they suggest that this site should also be allocated along with the site chosen for development in the Local Plan

South Wonston

Local Plan Reference or document	Lar	F nd at West Hill	Policy SW01 Road North
Total Number of Repres	entations received		23
Number of respondents consider the policy is –	who confirmed they	Yes	No
Legally Compliant		5	14
Sound		0	19
Complies with Duty to C	ooperate	4	15

Summary of Representations

A number of pressing concerns were raised in relation to proposed developments in South Wonston. A clear focus is on infrastructure and service limitations, with roads like Alresford Drove criticized for being too narrow and unsafe for increased traffic, alongside insufficient public transport and deficient healthcare services. The local primary school is also described as nearing capacity, while employment and utility shortfalls exacerbate the strain on services.

Respondents expressed concerns over unsuitability of allocating this site for development due to inadequate infrastructure, threatening sustainability and environmental impact as the site is a sensitive greenfield location, affecting local biodiversity and landscape.

Traffic and road safety issues were raised as key issues, with narrow roads and insufficient public transport leading to increased reliance on cars, posing potential safety risks, especially around the primary school.

Environmental concerns stress the harm to biodiversity and landscape, questioning development compatibility with sustainability frameworks.

Lastly, there are strong calls for improved public consultation and planning transparency, with critics citing inadequate community engagement and legal compliance in decision-making processes.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3BNN-A/1/SW01, ANON-AQTS-3BYE-C/1/SW01, ANON-AQTS-3B8D-A/1/SW01, ANON-AQTS-3BW6-U/1/SW01, ANON-AQTS-3B47-S/1/SW01,
ANON-AQTS-3B4M-F/1/SW01, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/8/SW01, ANON-AQTS-3B83-S/1/SW01, ANON-AQTS-3B55-R - South Wonston Parish Council/1/SW01, ANON-AQTS-329F-W/1/SW01, ANON-AQTS-329Y-G/1/SW01, ANON-AQTS-32UT-7/1/SW01, ANON-AQTS-32NH-M/1/SW01, ANON-AQTS-32ZZ-J/1/SW01, ANON-AQTS-32DP-J/2/SW01, ANON-AQTS-3B5P-K/1/SW01, ANON-AQTS-32HS-S/1/SW01, ANON-AQTS-32H3-S/1/SW01, BHLF-AQTS-32EY-V/1/SW01, BHLF-AQTS-326K-Y/1/SW01, BHLF-AQTS-32YV-D/1/SW01

Post Regulation 19 Actions

Proposed Modification to text at 14.169 & 14.170 for clarification purposes regarding Alresford Drove Road.

Proposed Modification to criterion vii to Policy SW1 in respect of health and wellbeing infrastructure in response to the HIOW ICB representation.

Main issues raised in representations received in regulation 19 consultation

- Compatibility with sustainable development goals;
- Strain on local services such as school, public transport and healthcare service limitations, lack of employment and utility shortfalls;
- Traffic and safety issues; and
- Local biodiversity and landscape impacts of development.

Sutton Scotney

Local Plan Reference or document		Policy SU01 Land at Brightlands
Total Number of Representations received		38

Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	28	9
Sound	3	34
Complies with Duty to Cooperate	14	23

Summary of Representations

Respondents raised concerns regarding infrastructure and local services capacity, which makes up 66% of the issues raised. The respondents stated that the existing sewage system is already overstretched, leading to reliance on tankers and they said they had limited confidence in Southern Water's ability to resolve these issues. The respondents said the proposed development at Brightlands threatens to worsen the situation, as many properties are not connected to the mains sewer.

Traffic congestion and safety were also raised by respondents as major worries due to inadequate roads and unsafe pedestrian paths, especially across the busy A30. Respondents also said that healthcare services are under pressure, with long GP waiting times posing a challenge as population growth looms. Environmental and health impacts form 63% of concerns, with increased flood risk and noise pollution from the A34 being key issues raised, alongside potential harm to groundwater management and local wildlife.

Access and connectivity account for 61% of the issues raised, due to respondents saying that unsafe pedestrian access due to a major road which acts a barrier. Respondents said they were dissatisfied with the consultation process accounting for 45% of issues, stating that better community engagement and clearer communication is needed.

Overall, the respondents said there is a necessity of addressing infrastructure, environmental, community engagement, and access issues before proceeding with any further developments in Sutton Scotney. Some respondents said they preferred the site south of Wonston Road because of location and better integration with the village. Another respondent said they favoured Brightlands over the land south of Wonston Road because of flooding concerns and the history of flooding on the land south of Wonston Road.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3B9K-J/1/SU01, ANON-AQTS-3BDS-5/1/SU01, ANON-AQTS-3BDX-A/1/SU01, ANON-AQTS-3BFV-A/1/SU01, ANON-AQTS-3BFX-C/1/SU01, ANON-AQTS-3BE3-6/1/SU01, ANON-AQTS-3BQG-6/1/SU01, ANON-AQTS-3BRE-5/1/SU01, ANON-AQTS-3B5Y-V/1/SU01, ANON-AQTS-3B5Q-M/1/SU01, ANON-AQTS-3B5S-P/1/SU01, ANON-AQTS-3BTM-F/1/SU01, ANON-AQTS-3BPW-N/1/SU01, ANON-AQTS-3BXV-V/1/SU01, ANON-AQTS-3BP3-H/1/SU01, ANON-AQTS-3BXG-D/1/SU01, ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/31/SU01, ANON-AQTS-3BXH-E/1/SU01, ANON-AQTS-3BP6-M - Wonston Parish Council/1/SU01, ANON-AQTS-327U-A - Southern Water/36/SU01, ANON-AQTS-32T7-9/10/SU01, ANON-AQTS-32F3-Q/1/SU01, ANON-AQTS-3BQ7-P/1/SU01, ANON-AQTS-32TW-9/7/SU01, ANON-AQTS-

32TX-A/1/SU01, ANON-AQTS-323C-M/1/SU01, ANON-AQTS-323T-5/1/SU01, ANON-AQTS-32U1-4/1/SU01, ANON-AQTS-3225-5/1/SU01, ANON-AQTS-3226-6/1/SU01, ANON-AQTS-3BE4-7/1/SU01, ANON-AQTS-32MT-Y/2/SU01, ANON-AQTS-32Z1-9/1/SU01, ANON-AQTS-3229-9/1/SU01, ANON-AQTS-32T6-8/1/SU01, BHLF-AQTS-32EY-V/6/SU01, BHLF-AQTS-3286-C/18/SU01, BHLF-AQTS-328R-8 - Hampshire County Council/29/SU01

Post Regulation 19 Actions

Proposed Change agreed with Historic England in relation to paragraph 14.183 (in relation to potential archaeological finds)

Proposed Change agreed with Southern Water in relation to policy criterion xvii (relating to wastewater infrastructure)

Proposed Change agreed with Southern Water in relation to a new criterion xix relating sewerage infrastructure

Main issues raised in representations received in regulation 19 consultation

- Responses expressed concerns about infrastructure and service limitations, including overstretched sewer systems, road capacity, and healthcare. Environmental and health concerns include heightened flood risks, utility shortages, pollution risks to the River Dever, traffic and noise issues from the A34:
- Concerns about access to the site and the A30 is seen as a barrier that
 poses safety risks, especially for pedestrians, due to limited pathways and
 crossings;
- Respondents said they would have liked more consultation and community engagement in the process of selecting sites;
- Responses included concerns about the development's impact on the historical and natural environment including flood prevention, and potential biodiversity and noise pollution;
- Some responses mentioned the archaeological significance, potentially housing Roman artefacts and ask for careful examination;
- Comments about transparency and consistency in policy implementation from Regulation 18 to Regulation 19 stage have been raised;
- Responses have called for further consultation and site assessments to address these concerns;
- Concerns were raised about the viability testing of the sites, the Parish council stated that the site hasn't been tested for 50-60 and only for 120, whereas the other sites in Sutton Scotney had been viability tested for 50-60:
- Some respondents stated that the land at Brightlands wouldn't naturally integrate with the village of Sutton Scotney and that other sites are more suitable. The site suggested as an alternative to Brightlands is Land South of Wonston Road:
- Flooding was also another key issue for many respondents and that new development wouldn't help to improve this issue; and

 One respondent was supportive of the land at Brightlands over the site south of Wonston Road due to the risk of flooding and history of flooding on the site.

Waltham Chase

Local Plan Reference or document			Policy WC1 organs Yard
Total Number of Represen		5	
Number of respondents who confirmed they consider the policy is –		Yes	No
Legally Compliant		4	1
Sound		1	4
Complies with Duty to Cooperate		3	2

Summary of Representations

One respondent questioned whether Waltham's Chase was correctly categorsied in the settlement hierarchy. Three questioned whether Morgan's Wyard (WC1) would come forward, given it has been allocated for a long period of time. The low amount of affordable housing (10%) achieved in the current application on the site) was also highlighted.

Three respondents considered additional site(s) should be allocated in this settlement.

Southern Water supported the approach in the policy to waste water infrastructure. The NHS Hampshire and Isle of Wight ICB requested that the policy highlight the potential need for additional health infrastructure.

Representation Numbers (Statutory consultees in bold and named)
ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/16/WC1, ANON-AQTS-3299-G/10/WC1, ANON-AQTS-327U-A - Southern Water/19/WC1, ANON-AQTS-3BPV-M/2/WC1, BHLF-AQTS-3288-E/2/WC1

Post Regulation 19 Actions

A Proposed Modification to Local Plan policy WC1 (page 501) to clarify the position regarding potential infrastructure requirements in response to the representation from the HIOW ICB.

Main issues raised in representations received in regulation 19 consultation

- Whether this site can be relied upon to come forward;
- Whether additional sites should be allocated for development; and
- Whether the policy adequately addresses potential infrastructure requirements.

Monitoring Framework

3.11 It is important to note that for the Monitoring Framework consultation questions, several questions were designed to cover the monitoring of multiple policies within the Local Plan. Some responses addressed only one specific policy, while others provided feedback relevant to all policies included in those questions. The table below reflects only those responses that 'did not agree with how the policy will be monitored', as referenced in their representation.

Policy Reference	Rep number	Summary of Representation
Introduction		
SP1	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
SP2	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
SP3	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
Carbon Neutralit	y and Designing	for Low Carbon Infrastructure

Policy Reference	Rep number	Summary of Representation
CN1	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
CN2	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
CN3	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
CN4	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
CN5	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Policy Reference	Rep number	Summary of Representation
CN6	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
CN7	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
CN8	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
High Quality We	II-Designed Place	es and Living Well
D1	ANON-AQTS- 3BAQ-Z, ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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

Policy Reference	Rep number	Summary of Representation
D2	ANON-AQTS- 3BAQ-Z, ANON-AQTS- 3BY1-R	Disagree with the proposed decision to reroute the Andover Road traffic down the Winchester Avenue
	ANON-AQTS- 3BE5-8	Request WCC and Hampshire County Council to RE_OPEN Andover Road as a requirement for the approval of St John Moore Barracks
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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
D3	ANON-AQTS- 3BAQ-Z, ANON-AQTS- 3BY1-R	Disagree with the proposed decision to reroute the Andover Road traffic down the Winchester Avenue
	ANON-AQTS- 3BE5-8	Request WCC and Hampshire County Council to RE_OPEN Andover Road as a requirement for the approval of St John Moore Barracks
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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

Policy Reference	Rep number	Summary of Representation
D4	ANON-AQTS- 3BAQ-Z, ANON-AQTS- 3BY1-R	Disagree with the proposed decision to reroute the Andover Road traffic down the Winchester Avenue
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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
D5	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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
	ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue
D6	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	The focus appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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
	ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue
D7	ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue

Policy Reference	Rep number	Summary of Representation
D8	ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue
D10	ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue
D11	ANON-AQTS- 3BY1-R	Disagree with the proposed decision to re- route the Andover Road traffic down the Winchester Avenue
Sustainable Tra	ansport and Active	Travel
T1	ANON-AQTS- 3B9Z-1	Planning applications give just a small idea of transport needs.
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
T2	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
ТЗ	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Policy	Rep number	Summary of Representation
Reference	Rep Hamber	Cumilary of Representation
T4	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
Biodiversity and	the Natural Envi	ronment
NE1	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE2	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE4	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE5	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Policy Reference	Rep number	Summary of Representation
NE6	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE7	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE8	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE9	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE10	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Policy Reference	Rep number	Summary of Representation
NE13	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
NE14	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
The Historic Env	rironment	
HE1	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
HE2	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
HE3	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Policy Reference	Rep number	Summary of Representation
HE4	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
HE5	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
HE6	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
HE7	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
HE9	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Policy Reference	Rep number	Summary of Representation
H1	ANON-AQTS- 329Q-8	Considering the current existing unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities (arising from the revised standard method), it appears unjustified to phase new greenfield allocations for the latter half of the plan period.
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
H2	ANON-AQTS- 329Q-8	Considering the current existing unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities (arising from the revised standard method), it appears unjustified to phase new greenfield allocations for the latter half of the plan period.
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
НЗ	ANON-AQTS- 329Q-8	Considering the current existing unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities (arising from the revised standard method), it appears unjustified to phase new greenfield allocations for the latter half of the plan period.

Policy Reference	Rep number	Summary of Representation
	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
H4	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
H5	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
H6	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
H7	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
H8	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent considers that a more comprehensive approach to monitoring should be set out which would assess the outcomes and the effectiveness of the full

Policy Reference	Rep number	Summary of Representation		
		range of the Plan's policies and the decisions arising from them.		
H8	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning application and appeals. The respondent considers that 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 decision arising from them.		
H12	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.		
H14	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning application and appeals. The respondent considers that more comprehensive approach to monitoring		
H15	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.		
H16	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.		
H17	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	 Focus for monitoring appears to be limited to monitoring decisions of planning application and appeals. The respondent considers that more comprehensive approach to monitorin 		

Policy Reference	Rep number	Summary of Representation	
		range of the Plan's policies and the decisions arising from them.	
H18	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.	
Creating a vibra	nt economy		
E1	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.	
E2	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.	
E3	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.	
E5	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.	
E6	ANON-AQTS- 3BEW-A - Littleton and	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent considers that a more comprehensive approach to monitoring	

Policy Reference	Rep number	Summary of Representation
	Harestock Parish Council	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.
E7	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
E8	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
E9	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
E10	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.
E11	ANON-AQTS- 3BEW-A - Littleton and Harestock Parish Council	Focus for monitoring appears to be limited to monitoring decisions of planning applications and appeals. The respondent 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.

Evidence Base

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
Development Strategy and Site Selection	9	General concern about outcomes of the IIA, development strategy and site selection process and why sites had been allocated or not, rather than comments on the document 'Development Strategy and Site Selection'	ANON-AQTS-329R- 9/8/Development Strategy and Site Selection, ANON-AQTS- 32SJ-U/13/Development Strategy and Site Selection, ANON-AQTS- 32TT-6/6/Development Strategy and Site Selection, ANON-AQTS- 32TA-K/6/Development Strategy and Site Selection, ANON-AQTS- 3BPV-M/6/Development Strategy and Site Selection, ANON-AQTS- 32TQ-3/4/Development Strategy and Site Selection, ANON-AQTS- 32TM-Y/3/Development Strategy and Site Selection, ANON-AQTS- 32DS-N/3/Development Strategy and Site Selection, ANON-AQTS- 32ZM-5/6/Development Strategy and Site Selection Site Selection
Settlement Hierarchy	8	Criticism of the methodology and how facilities have been scored and weighted. Particular reference to	ANON-AQTS-3B83- S/3/Settlement Hierarchy, ANON-AQTS-32CD-5 - Colden Common Parish Council/55/Settlement Hierarchy, ANON-
		South Wonston that the	AQTS-32TT-

³ Single representations were received to Housing Topic paper, Windfall Assessment, Neighbouring Local Plans, Strategic Flood Risk Assessment, Renewable Energy Study for Winchester District Development Framework (December 2008) these simply cross refer to more detailed reps under other policies, rather make specific representations on these documents.

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
		settlement has been inaccurately recorded and should be recategorized. Specific reference to Colden Common being incorrectly categorised. Support for Kings Worthy and Swanmore as larger rural settlements. Query facilities listed in Waltham Chase. Query why Curdridge does not have a settlement boundary and falls within the 'remaining	6/5/Settlement Hierarchy, ANON-AQTS-32TA- K/5/Settlement Hierarchy, ANON-AQTS-3BPV- M/5/Settlement Hierarchy, ANON-AQTS- 3B5P-K/2/Settlement Hierarchy, BHLF-AQTS- 3288-E/9/Settlement Hierarchy, BHLF-AQTS- 32QC-J/5/Settlement Hierarchy
Strategic Transport Assessment	7	rural area'. Reps refer to out of date and incorrect data — particularly the reliance on 'predict and provide' approach to capacity modelling. The flawed and incomplete assessment process undermines the Plan's sustainability claims and casts doubt on its alignment with its own emerging policies and Plan objectives, but also of national policy and netzero objectives. These issues go to the heart of soundness and significant further evidence is required. Representations also refer to the massive loss of local bus services recently and how this impacts on the lack of	ANON-AQTS-32CD-5 - Colden Common Parish Council/56/Strategic Transport Assessment, ANON-AQTS-3BQA- Z/23/Strategic Transport Assessment, ANON- AQTS-32Z3- B/1/Strategic Transport Assessment, BHLF- AQTS-328Z-G - Durley Parish Council/1/Strategic Transport Assessment, BHLF-AQTS-328N- 4/3/Strategic Transport Assessment, BHLF- AQTS-328R-8 - Hampshire County Council/35/Strategic Transport Assessment, BHLF-AQTS-32QF-N - National Highways/5/Strategic Transport Assessment

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
		alternatives and the assumptions made with regard to modal shift. The subject of Public Transport within the Winchester District is so significant that it deserves a collaborative focus that includes all relevant bodies.	
		 fails to acknowledge the significant loss of public transport over the last Local Plan period and the impact of that loss, during a period of large-scale development fails to identify the positive action required by the Local Transport Authority (LTA) to identify and act on the opportunities presented by WCC's proposed delivery of new housing; fails to identify proven, deliverable funding models to support necessary public transport infrastructure, given the failure of previous models to support large developments; fails to identify action required to 	

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
		develop a viable, integrated public transport network in support of new housing, to align growth and infrastructure as required by the NPPF; • the STA is therefore unfit for purpose and places the soundness of the Draft Plan in question. The County Council support the use of a "vision led" approach which focuses on providing a genuine travel choice and the use of the Sub Regional Transport	
		Model (SRTM) to assess the traffic growth and impacts on the network serving Winchester and southeast Hampshire	
Settlement Gap Review	5	While measurements of settlement gaps are stated, distances are not consistently noted or shown on any of the supporting plans. Question whether the review has been informed by site visits. The report does not clarify	ANON-AQTS-32G7-V/20/Settlement Gap Review, ANON-AQTS-32SJ-U/15/Settlement Gap Review, ANON-AQTS-32TA-K/7/Settlement Gap Review, ANON-AQTS-3BPV-M/7/Settlement Gap Review, BHLF-AQTS-3287-D/3/Settlement Gap
		whether all or part of the current settlement gaps perform in accordance	Review

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
		with the 'definition' of a settlement gap in order to make judgements as to whether the boundaries should be adjusted, either expanding or reducing. Representations refer to specific gaps and question areas of inclusion/exclusion.	
Strategic Housing and Economic Land Availability Assessment (SHELAA)	4	Comments relate to the inclusion or lack of specific sites and there's reference to the IIA and how sites were chosen for allocation.	ANON-AQTS-329R- 9/9/Strategic Housing and Economic Land Availability Assessment (SHELAA), ANON- AQTS-32SJ- U/14/Strategic Housing and Economic Land Availability Assessment (SHELAA), ANON- AQTS-32ZM- 5/7/Strategic Housing and Economic Land Availability Assessment (SHELAA), BHLF-AQTS- 328W-D/8/Strategic Housing and Economic Land Availability Assessment (SHELAA)
Viability Assessment	3	Concern that the viability of Policy CN3 has not been properly assessed and that the cost of meeting BNG has not been fully accounted for. HBF consider it necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG.	ANON-AQTS-32GG-C/11/Viability Assessment, ANON-AQTS-3274-9/6/Viability Assessment, ANON-AQTS-3BQA-Z/24/Viability Assessment

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
		Another rep requests the viability report is re-run to examine sheltered and extra care housing and that this is likely to be less viable than is assumed.	
Statement of Community Involvement	2	Concern that the views of residents in South Wonston are being ignored	ANON-AQTS-3B83- S/4/Statement of Community Involvement, ANON-AQTS-3B5P- K/3/Statement of Community Involvement
Bushfield Planning Application documents	1	This is the only document which considers the viability of the proposals from a commercial point of view – which the Parish have relied on for their comments.	ANON-AQTS-32N7-3 - Twyford Parish Council/7/Bushfield Planning Application documents
Infrastructure Delivery Plan	1	The Infrastructure Delivery Plan (IDP) document relies on the M3 J9 upgrade being completed. Whilst this is committed and construction is underway, there is not currently a fixed date for completion. Completion is expected to be within the third road period (2025-2030). The agreed mitigation package for Bushfield may necessitate future updates to the IDP.	BHLF-AQTS-32QF-N - National Highways/7/Infrastructure Delivery Plan
Employment Land Study	1	Conclusions of the ELS are that there is a total overall need of between 27.6ha – 38.9 ha of employment land but that there is a supply of 50ha which exceeds the need. This is based on reconfirming the existing	ANON-AQTS-32F2- P/10/Employment Land Study

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
WinACC	1	development plan allocations (policy W5, W6, W1). However, any provision will be part of land ancillary to the main residential uses. No consideration has been given to whether these sites are actually deliverable owing to the fact they are a carried over local plan allocation. The plan makes no reference nor considers the importance of economic growth in the rural proportion of the District to the overall economy of the area. This document was	ANON-AQTS-3BR7-
Renewable Energy in Winchester District (February 2022)	•	updated in May 2023	Q/3/WinACC Renewable Energy in Winchester District (February 2022)
Village Design Guidelines and Neighbourhood Plans	1	The Twyford Neighbourhood Plan is not referred to as is relevant to the local plan.	ANON-AQTS-32N7-3 - Twyford Parish Council/5/Village Design Guidelines and Neighbourhood Plans
Strategic Housing Market Assessment	1	As the plan was not submitted as previously intentioned in 2021, the housing need should be re-assessed with 2024 as a base date, which when applied using the standard method calculates a housing need of 676 dpa. Consideration should also be given to	BHLF-AQTS-328W- D/9/Strategic Housing Market Assessment

Local Plan Evidence document ³	Total Number of Reps received	Summary of Representations	Representation Numbers (Statutory consultees in bold and named)
		rolling forward the plan period	
Setting Of Winchester Report	1	Rep highlights the relevance of this report to the Bushfield Camp site.	ANON-AQTS-32N7-3 - Twyford Parish Council/6/Setting Of Winchester Report