

Mr Matthew Giles  
Plans Team  
The Planning Inspectorate  
(sent via email to  
plans.admin@planninginspectorate.go  
v.uk)

Your Ref: Regulation 22 Submission  
Contact: Adrian Fox, Strategic  
Planning Manager  
Direct Line: [REDACTED]  
Email: [REDACTED]

15th November 2024

Dear Matthew,

### **Proposed Submission Winchester District Local Plan 2040**

Winchester City Council is pleased to submit our Proposed Submission Local Plan 2040 to the Secretary of State for Housing, Communities and Local Government for an independent examination in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

#### **Background:**

The Local Plan sets out the city council's vision and objectives for the future development of the District outside of the South Downs National Park (which has its own Local Plan) – Winchester itself, our market towns, villages and countryside. It includes new Strategic policies, Development Management policies against which planning proposals will be assessed for housing, employment and open space as well as specific sites that are needed to deliver the growth over the next 15 years. Once adopted, it will replace the current Local Plan (Local Plan Part 1 – Joint Core Strategy, Local Plan Part 2 – Development Management and Site Allocations and the Gypsy, Traveller and Travelling Showpeople Development Plan Document). When it has been adopted, it will be the Council's statutory Development Plan that will be used to assess the planning merits of development proposals.

The Local Plan making process started in 2018 and it has undergone four separate stages of public consultation: Launch of the Local Plan (2018), Strategic Issues and Priorities (2021), Regulation 18 Local Plan (2022) and the Proposed Submission Local Plan (Regulation 19) (2024).

#### **Engagement process:**

At each stage of the Local Plan making process, we have tried to engage with as many people and organisations as possible all of which has been documented in the Regulation 22 Statement of Consultation.



The Regulation 22 Statement of Consultation documents outlines all of the engagement that has taken place from 2018 to date (including summaries of the representations that were made to the Proposed Submission Local Plan (Regulation 19)). This demonstrates that statutory consultees, individuals and organisations have made comments on the local plan, which have been considered by the Council and have informed the version of the local plan now submitted for examination.

Specifically, the Strategic Issues and Priorities (SIP) public consultation, which was undertaken during a national lockdown, won two Royal Town Planning Institute (RTPI) awards for the engagement process that we followed. The public consultation on the SIP won the RTPI Excellence award for Plan making and was the overall Regional winner for the South East. Gareth Giles FRTPI, Chair of RTPI South East judging panel, said: *“Winchester’s Local Plan Consultation project demonstrated excellence in engagement and a willingness to actively learn from, and improve its processes to reach as many people as possible. It is a shining example of innovation in a pandemic context, as well as making use of new technological innovations. Local authorities should look to this as an example of best practice for consultations in their own areas”*.

In addition, in recognition that Active Travel England (ATE) are a new statutory agency, Officers from the city council were part of a pilot project with ATE. As part of the pilot project, ATE provided feedback on the draft policies that were included in the Regulation 18 Winchester Local Plan. ATE provided suggestions on where policies could be strengthened, and where the links between active travel and other planning objectives could be improved. This collaborative work was undertaken to ensure that the policies in the Local Plan promote walking, cycling and wheeling. ATE have subsequently confirmed in writing in response to the Regulation 19 public consultation that they have worked closely with Officers from the city council to strengthen the consideration of active travel and its associated benefits in the Local Plan.

#### **Duty to Cooperate:**

The city council has produced a Duty to Co-operate Statement of Compliance which is supported by a series of Statements of Common Ground with organisations such as Natural England, the Environment Agency, National Highways and Southern Water and a number of neighbouring authorities – please see documentation submitted.

In addition to this, Officers have actively engaged in discussions with neighbouring Authorities both bilaterally and through the Partnership for South Hampshire (PfSH) over the course of the plan preparation. At a meeting of the PfSH Joint Committee on 6th December 2023 a Spatial Position Statement (SPS) was agreed [PfSH Spatial Position Statement 2023 - Partnership for South Hampshire \(push.gov.uk\)](#) The SPS sets

out a two-stage approach to meeting housing needs: expecting those authorities that are able to exceed their 'Standard Method' housing requirement to do so (including Winchester) and identifying a number of Broad Areas of Search. Together these approaches will seek to address the shortfall of housing need in the PfSH area. In accordance with this approach, the Regulation 19 Local Plan includes an 'unmet need allowance' (for unmet need in neighbouring authorities) of 1,900 dwellings (over and above the current Standard Methodology).

**Working collaboratively with statutory consultees:**

Throughout the preparation of the Local Plan making process Officers from the city council worked collaboratively with a range of statutory agencies. Please see Statements of Common of Ground and the Schedule of Proposed Modifications that has been prepared to address the outstanding comments that have been submitted by the Statutory Agencies to the public consultation on the Regulation 19 Local Plan.

We have worked positively with Natural England to resolve the issue of nutrient neutrality (please see Nutrient Neutrality Topic Paper) and air quality in relation to the Habitats Regulations Assessment (HRA). However, shortly before the city council published the Regulation 19 Local Plan Natural England advised the council that they had specific concerns relating to how the Plan had addressed air quality on the natural environment with particular reference to Bushfield Camp (Policy W5). Officers had previously agreed with Natural England that this issue could be addressed through criterion xv. in Policy W5. This particular issue only came to light during the drafting of the Statement of Common Ground with Natural England to support the Regulation 19 Local Plan.

In order to address the above issues an air quality specialist was commissioned to undertake an Air Quality Assessment for the HRA. This work investigated whether there were any likely significant effects and if mitigation would be required, to address Natural England's concerns regarding this specific site allocation. It is important to point out that this is a slightly complicated site as it is the subject of a live planning application.

I am pleased to be able to confirm that an air quality assessment has now been completed. The Air Quality Assessment still needs to be agreed and signed off by Natural England but it has confirmed:

- Traffic flows do not result in any exceedances of the 1% screening threshold for nitrogen oxides (NOx) or ammonia (NH3), nutrient nitrogen deposition and acid nitrogen deposition and the Local Plan in isolation assessment results in a decreased in predicted concentrations/deposition rates at the River Itchen SAC; and

- The Local Plan in combination assessment results in exceedance of the 1% screening threshold for NOx, NH3 and nutrient N deposition, however these are due to in-combination sources.

The Air Quality Assessment and the site visit from an Ecologist has concluded that it is unlikely that the Local Plan in isolation and in combination will have an adverse effect on site integrity at the River Itchen SAC. Subject to Natural England agreeing to the conclusions of this work a further addendum to the Habitat Regulations Assessment will be published in November/December. Officers are confident that this issue can be resolved but unfortunately, it has not been possible to do this prior to the submission of the Local Plan.

### **Compensatory Habitats:**

Natural England has also advised the Council that the River Meon and River Dever are being considered as compensatory habitat for Southern Water's Drought Plan. At the point the Drought Order is enacted the River Meon will be considered as the River Itchen Compensatory Habitat SAC, similarly the River Dever will become the River Test Compensatory Habitat SAC. There has been a delay with taking this issue forward as Natural England were unable to produce a plan of the roads that fell within this compensatory habitat. The Council are working with their HRA consultants to understand whether the assessment of road impacts within 200m of the compensatory habitats site will necessitate air quality assessment. Subject to Natural England's agreement, this matter will also be included in a further addendum to the HRA that will be published in November/December.

### **PINS advisory meetings:**

Officers from the city council and the Cabinet Member for Place and the Local Plan have attended two online PINS Advisory meetings. These meetings have been extremely beneficial in not only shaping the evidence base that has supported the Local Plan but also the wording of some of the policies in the Local Plan. Topic Papers have been published on a range of issues which was one of the key recommendations from these meetings – please see documentation submitted.

### **National Planning Policy Framework:**

The Local Plan is being submitted under the current arrangements for examination but also following the transitional arrangements in Annex 1 of the draft proposed [National Planning Policy Framework](#) (NPPF). Annex 1 of the proposed NPPF states at paragraph 226 (c) *'the local plan is or has been submitted for examination under Regulation 22 on or before [publication date + one month]*. The Proposed Modifications include additional wording to paragraph 3.8 and Policy SP2 in order to make it entirely clear that the city council is committed to undertake a review of the Local Plan 2040, no later than 6 months from the adoption of the plan. This review will primarily address any changes in the National Planning Policy Framework and

the Standard Methodology. In view of this, when you confirm receipt of this letter and the accompanying documents that have been submitted for examination it would be helpful if you can please confirm that the Plan will be examined on the basis of the current (Dec 2023) NPPF – see point below.

**Authority to submit the Local Plan for examination:**

I can confirm that the relevant council authority was granted on 28 August 2024 at a meeting of Full Council [Agenda for Council on Wednesday, 28th August, 2024, 6.30 pm - Winchester City Council](#) for submission of the Local Plan and supporting documents to PINS. This follows the publication and consultation on the Regulation 19 Local Plan for a six week period from 29<sup>th</sup> August until 13<sup>th</sup> October 2024.

**Schedule of Proposed Modifications:**

Delegated authority was granted to the Strategic Planning Manager in consultation with the Cabinet Member for Place and the Local Plan, to prepare and to submit a Schedule of Proposed Modifications to PINS. The Schedule of Proposed Modifications (listed in documents SD14a and SD14b) have not yet been subject to consultation but are hopefully, helpful to the Inspector. They include updated data or matters of clarification, and other editorial changes, as mentioned above they are intended to address minor points that have been mainly raised by representations from statutory consultees received as part of the Regulation 19 public consultation.

**Main Modifications:**

In accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended), the council requests that the Inspector recommends main modifications as necessary to make the plan sound and legally compliant (delegated authority has already been given to the Strategic Planning Manager for this to happen). Please can this letter be treated as the formal request which is required under the legislation.

**Egress data sharing platform:**

Appendix 1 to this letter includes a list of documents that have been submitted to PINS via the city council's Egress data sharing platform. These documents are also available on the Local Plan examination website.

We have also uploaded an excel spreadsheet to the Egress sharing platform that includes all the representations with personal data and contact details for the Inspector. On the Local Plan Examination website, there is a searchable database of all the representations (which excludes personal contact data)

**Programme Officer:**

The name of the appointed Programme Officer along with their contact details is:

Ms Jill Taylor.

Address: Winchester City Council Local Plan Examination, Winchester City Council Offices, Colebrook Street, Winchester, Hampshire, SO23 9LJ.

Email: [Programmeofficer@winchester.gov.uk](mailto:Programmeofficer@winchester.gov.uk)

Telephone number: 07980 732 035

I can confirm that Jill recently attended a PINS Programme Officer training event in London which she found to be extremely beneficial.

**Local Plan Examination webpage:**

The Local Plan Examination webpage can be found here [Local Plan Examination - Winchester District Local Plan](#) which includes details of the Programme Officer and is ready to add future correspondence with the Inspector. The design and layout of the Examination website has been based on examples that have been provided to us by PINS and the feedback that our Programme Officer received at their recent training event.

**Legal representation:**

Officers from the city council will be assisted throughout the Local Plan examination process by Andrew Fraser-Urquhart KC who has provided advice to Officers throughout the preparation of the Local Plan.

**Estimated number of sitting days:**

The council estimates that we would need in the region of 10 sitting days for the hearings but this is only an approximate estimate at this stage and it will depend on the range and complexity of the matters, issues and queries to be identified by the appointed Inspector. The council is willing to host both in person hearing sessions and/or virtual hearings as the Inspector considers necessary.

**Timing of the examination:**

From a city council perspective, due to a key a member of the team retiring and the availability of the Local Plan KC, we fully appreciate that this would be the subject to the availability of an Inspector, if the examination could take place around the middle of February 2025 that would be very much appreciated.

**Proposed venue:**

In terms of the proposed venue for the Local Plan Examination, Officers are recommending that the Inspector uses the Walton suite in the Guildhall, Winchester. This meeting room is publicly accessible, meets accessibility needs (including a hearing loop), it is used for monthly Planning Committee meetings and it was used successfully for previous Local Plan examinations. We confirm that separate office

facilities and on-site parking will be made available for the Inspectors sole use during the hearing sessions which will be arranged by the Programme Officer.

**Main issues arising from the Regulation 19 public consultation:**

Appendix 2 includes a table that indicates how many people would, subject to the agreement of the Inspector, wish to participate in the examination.

The main issues arising from the public consultation which have been included in the Regulation 22 Statement are as follows:

**Local Plan topics main issues (in no particular order):**

- NPPF proposed changes to housing numbers.
- Development Strategy / growth options that were tested.
- Current and the future scale of unmet PfSH housing need.
- Unmet housing need allowance that has been included in the Regulation 19 Local Plan (1,900 homes).
- Proposed phasing of greenfield sites (2030).
- Local Plan period.
- LP Viability / Biodiversity Net Gain.
- Policy CN3 (LETI).

**Development allocations (in no particular order):**

- Bushfield Camp, Winchester - Policy W5.
- SJM Barracks - Policy W2 and Kings Barton - Policy W1 (particularly relating to the closure of Andover Road).
- Land West of Courtenay Road, Winchester - Policy W4.
- Land at West Hill Road, South Wonston - Policy SW01.
- Land North of Rareridge Lane, Bishops Waltham – Policy BW4.
- Land at Brightlands, Sutton Scotney – Policy SU01.
- Wickham site allocations.

As expected, there are also representations from various site promoters/developers who are promoting their own sites and comments on the Local Plan evidence base that has informed the development of the Local Plan.

**Service Level Agreement:**

We have already entered into a Service Level Agreement with PINS and a Purchase Order will be set up shortly. It would be helpful once the Inspector has been appointed if you could please let me have a broad indication of the likely costs so that I can raise a Purchase Order.

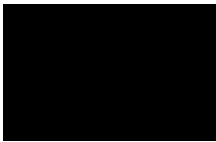
**Submission Notification:**

Notification will now be sent to all those who have commented on the Regulation 19 Local Plan, requested to be kept informed of progress on the Local Plan, or have been asked to notify them when we have submitted the Local Plan for examination. We have also notified specific and general consultees.

We look forward to working with the Planning Inspectorate to deliver a smooth and efficient examination.

Finally, it would be greatly appreciated if you could please confirm receipt of this letter and that the Winchester City Council Local Plan has, under the regulations, been accepted by PINS as being submitted for examination. In due course please can you be so kind as to let us know the name of the Inspector. Should you require any further information, please do not hesitate to contact me.

Yours sincerely



Adrian Fox  
**Strategic Planning Manager**



## Appendix 1 - Local Plan submission documents:

- SD01**      [Winchester District Local Plan 2020 – 2040: Proposed Submission Local Plan \(Regulation 19\) \(August 2024\)](#)  
**Integrated Impact Assessment** - Which incorporates the Sustainability Appraisal, Equality Impact Assessment and Health Impact Assessment.
- SD02a**      [Integrated impact Assessment \(IIA\) Regulation 19 - Main Report \(July 2024\)](#)
- SD02b**      [Integrated Impact Assessment \(IIA\) Regulation 19 - Appendices A to E \(July 2024\)](#)
- SD02c**      [Regulation 19 Integrated Impact Assessment \(IIA\) Report Appendix F \(July 2024\)](#)
- SD02d**      [Integrated impact Assessment \(IIA\) Regulation 19 - Non Technical Summary \(July 2024\)](#)
- SD03**      **Winchester District Local Plan Habitats Regulations Assessment**  
[Regulation 19 Habitat Regulations Assessment Report \(July 2024\)](#)
- SD04a**      [Addendum to the Habitats Regulation Assessment \(November 2024\)](#)
- SD04b**      Air Quality for the Habitats Regulations Assessment for the Submission Local Plan 2020 – 2040  
[Air Quality Assessment, November 2024](#)
- SD05**      **Submission Policies Map**  
[Local Plan Policies Map document](#)  
[Submission Interactive Policies Map](#)

## Public consultation / Duty to Cooperate:

- SD06**      **Duty to Cooperate Statement of Compliance (August 2024)**  
[Duty to Cooperate - Statement of Compliance](#)

- SD07a [Regulation 22 Statement of Consultation Part 1 \(November 2024\)](#)  
SD07b [Regulation 22 Statement of Consultation \(November 2024\) Part 2 \(this includes a summary of the representations\)](#)

**Statements of Common Grounds with neighbouring authorities and other statutory bodies:**

- SD08a [Basingstoke & Deane Borough Council - Statement of Common Ground \(August 2024\)](#)  
SD08b [East Hampshire District Council Statement of Common Ground \(August 2024\)](#)  
SD08c [Eastleigh Borough Council Statement of Common Ground \(September 2024\)](#)  
SD08d [Fareham Borough Council Statement of Common Ground \(August 2024\)](#)  
SD08e [Havant Borough Council - Statement of Common Ground \(October 2024\)](#)  
SD08f [Natural England Statement of Common Ground \(September 2024\)](#)  
SD08g [National Highways Statement of Common Ground \(October 2024\)](#)  
SD08h [Partnership for South Hampshire Statement of Common Ground](#)  
SD08i [Portsmouth Statement of Common Ground \(October 2024\)](#)  
SD08j [SDNPA - Statement of Common Ground \(August 2024\)](#)  
SD08k [Southern Water Statement of Common Ground \(August 2024\)](#)  
SD08l [Test Valley Borough Council Statement of Common Ground \(August 2024\)](#)

**Legal:**

- SD09 [Submission Statement of Fact \(November 2024\)](#)

**Other documentation:**

**Council Local Plan Topic Papers**

- SD10a [Carbon Neutrality and Embodied Carbon Topic Paper \(November 2024\)](#)

- SD10b [Development Strategy and Site Selection Proposed Submission Plan Topic paper \(July 2024\)](#)
- SD10c [Development Strategy and Site Selection Proposed Submission Plan Topic Paper Appendix 3 \(July 2024\)](#)
- SD10d [Gypsy and Travellers Topic Paper \(July 2024\)](#)
- SD10e [Health Topic Paper \(August 2024\)](#)
- SD10f [Heritage Topic Paper \(July 2024\)](#)
- SD10g [Housing Topic Paper \(July 2024\)](#)
- SD10h [Nutrient Neutrality Topic Paper \(November 2024\)](#)
- SD10i [Student Accommodation Topic Paper \(July 2024\)](#)
- SD10j [Wickham site selection paper](#)
- SD11** **Timetable - Local Development Scheme (August 2023)**  
[Local Plan Timetable \(Local Development Scheme 2023\)](#)
- SD12** **Statement of Community Involvement**  
[Statement of Community Involvement \(SCI\) 2024](#)
- SD13** **Authorities Monitoring Report 2022/2023**  
[Authorities Monitoring Report 2022-2023](#)  
The 2023/2024 AMR will be finalised by mid/late December 2024.
- SD14a** [Schedule of Proposed Modifications \(November 2024\)](#) - The schedule of proposed modifications have not yet been subject to any public consultation at this stage
- SD14b** **Appendix 1 – Schedule of Proposed Modifications (November 2024)**  
[Appendix 1 Schedule of Proposed Modifications](#)
- SD15** [Legal and Soundness Statement](#)

**Appendix 2 - Number of respondents who want to take part in a hearing session if invited by the Inspector to participate.**

<b>By Policy</b>	
<b>Introduction</b>	
SP1	29
SP2	56
SP3	12
<b>Carbon Neutrality and Designing for Low Carbon Infrastructure</b>	
CN1	22
CN2	14
CN3	22
CN4	11
CN5	4
CN6	3
CN7	2
CN8	13
<b>High Quality Well-Designed Places and Living Well</b>	
D1	16
D2	8
D3	0
D4	4
D5	11
D6	12
D7	3
D8	2
D9	0
D10	1
<b>Sustainable Transport and Active Travel</b>	
T1	24
T2	13
T3	13
T4	7
<b>Biodiversity and the Natural Environment</b>	
NE1	15
NE2	2
NE3	10
NE4	8

NE5	13
NE6	7
NE7	25
NE8	6
NE9	5
NE10	9
NE11	5
NE12	0
NE13	4
NE14	4
NE15	5
NE16	6
NE17	2
The Historic Environment	
HE1	1
HE2	2
HE3	1
HE4	3
HE5	4
HE6	2
HE7	1
HE8	1
HE9	1
HE10	1
HE11	1
HE12	1
HE13	0
HE14	2
Homes for All	
H1	51
H2	45
H3	50
H4	15
H5	17
H6	17
H7	1
H8	0
H9	6

H10	1
H11	0
H12	1
H13	0
H14	0
H15	0
H16	0
H18	0
Creating a vibrant economy	
E1	5
E2	2
E3	5
E4	2
E5	4
E6	4
E7	0
E8	4
E9	1
E10	0
E11	0
Winchester Site Allocations	
W1 Barton Farm Major Development Area	16
W2 Sir John Moore Barracks	29
W3 St Peter's Car Park	4
W4 Land West of Courtenay Road	29
W5 Bushfield Camp	18
W6 Winnall	6
W7 Central Winchester Regeneration	11
W8 Station Approach Regeneration Area	11
W9 Bar End Depot	5
W10 Former River Park Leisure Centre Site	7
W11 University of Winchester / Royal Hampshire County Hospital	5
South Hampshire Urban Area	
SH1 Newlands (West of	3

Waterlooville)	
SH2 North Whitely	8
SH3 Whiteley Green	2
SH4 Solent Business Park	1
SH6 Botley Bypass	0
The Market Towns and Rural Area	
BW1 The Vineyard/Tangier Lane	5
BW3 Tollgate Sawmill	6
BW4 Land North of Rareridge Lane	24
NA1 The Dean	3
NA2 Sun Lane	4
NA3 Neighbourhood Plan Designated Area	2
CC1 Clayfield Park	6
CC2 Colden Common Farm	3
CC3 Land at Main Road	4
CC4 Land adjoining 85 Church Lane	3
DEN1 Neighbourhood Plan Designation Area	9
KW1 Cornerways & Merrydale	4
KW2 Land adjoining the Cart & Horses PH	9
SW1 The Lakes	3
WK1 Winchester Road Housing Allocation and Open Space Allocation	6
WK3 Wellborne Open Space	6
WK5 Land at Mill Lane	13
WK6 Land at Southwick Road/School Road	10
KN1 Ravenswood	6
HU1 Neighbourhood Plan Designation Area	3
OT01 Land East of Main Road	6
SW01 Land at West Hill Road North	8
SU01 Land at Brightlands	22
WC1 Morgans Yard	4

The Market Towns and Rural Area (By Settlement)	
Market Towns Bishop's Waltham	35
Market Towns New Alresford	9
Larger Rural Settlements Colden Common	16
Larger Rural Settlements Denmead	9
Larger Rural Settlements Kings Worthy	13
Larger Rural Settlements Swanmore	3
Larger Rural Settlements Wickham	41
Intermediate Rural Settlements Hursley	3
Intermediate Rural Settlements Otterbourne	6
Intermediate Rural Settlements South Wonston	8
Intermediate Rural Settlements Sutton Scotney	22
Intermediate Rural Settlements Waltham Chase	4