

## Details of Representations Received to the Proposed Submission Local Plan (Reg19) January 2025

### Homes for All

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [Regulation 22 Statement of Consultation Part 2 \(November 2024\)](#) and SD16 [Regulation 20 representations \(November 2024\)](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

Local Plan Reference or document	Policy H1 Housing Provision	
Total Number of Representations received	64	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	26	31
Sound	5	52
Complies with Duty to Cooperate	20	37
<p><b>Summary of Representations</b>  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particularly considering the draft changes to the National Planning Policy Framework, suggesting the plan relies on outdated data which does not adequately consider future government policy, or makes insufficient provision for the unmet housing needs of other authorities.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.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  <b>ANON-AQTS-3BTS-N - East Hampshire District Council/1/H1</b>  <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/18/H1</b>  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  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/18/H1</b>  ANON-AQTS-32GC-8/4/H1  <b>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/6/H1</b>  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</p>		

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

**Main issues raised in representations received in regulation 19 consultation**

- 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'.

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Heather Stevens
<b>Personal reference number</b>	ANON-AQTS-3BTS-N - East Hampshire District Council
<b>Full reference number</b>	ANON-AQTS-3BTS-N - East Hampshire District Council/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>East Hampshire District Council has engaged with Winchester City Council as its prepared its Local Plan. A Statement of Common Ground has been signed by both Council's outlining our agreement on key strategic cross boundary matters. We are mindful that Winchester City Council is intending to submit its Local Plan ahead of proposed changes to the NPPF (currently subject to consultation). If this deadline is missed and Winchester City Council cannot take advantage of the proposed transitional arrangements for the new NPPF, then there may be test of soundness issues.</p> <p>However at this time, East Hampshire District Council is content that there is an up to date Statement of Common Ground in place, and as such 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.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	N/a
<b>What is your suggested wording or text for the policy?</b>	N/a
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/18/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>1. WCC are proposing a figure of 15,465 which is in excess of the figure based on the Government's standard methodology and exceeds it by 1,900 homes. The justification for the extra homes is to cover the possibility of adjoining districts including in the area covered by the Partnership for South Hampshire (PfSH) not meeting their own requirements.</p> <p>2. How the figure of 1,900 was arrived at is not clear and seems premature as WCC has not received formal requests to meet unmet needs from adjoining authorities. An increase of 14% in the housing required by the Government has not been justified. The larger figure creates unnecessary pressure to allocate land for housing and to maximise the number of dwellings on proposed sites such as the Sir John Moore Barracks (SJMB) site than would otherwise be appropriate given the site constraints.</p> <p>3. The five-year housing land supply for the district is calculated on the annualised number of dwellings per year proposed in the local plan. WCC's approach of increasing its requirement has a significant impact on the five-year figure. This results in an annual requirement for 773 dwellings, which is in excess of the average rate of completions that WCC have experienced in the last 10 years. A failure to deliver the projected requirement would lead to a supply shortfall which would make areas in the parish vulnerable to planning by appeal. The Parish Council objects to the policy and considers that the local plan requirement for 15,465 is not justified and should be reviewed.</p> <p>Object to Policy H1. The requirement for 15,465 dwellings has not been justified</p> <p>Object to Policy H1. The addition of a buffer of 1,900 dwellings is not necessary and has not been justified.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove the unmet needs allowance and amend the housing figure to read 13,565.
<b>What is your suggested wording or text for the policy?</b>	Remove the unmet needs allowance and amend the housing figure to read 13,565.

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a>



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/28/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	While it is important to ensure everybody has somewhere to live, it is also very important to do this in a sustainable way that does not damage the environment and minimise the use of green land. Much care is needed in developing and evaluating housing plans to make sure this happens.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Merlin Homes
<b>Personal reference number</b>	ANON-AQTS-3B8W-W
<b>Full reference number</b>	ANON-AQTS-3B8W-W/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>We support some of the policy changes but object to others. In particular, we believe housing delivery would be prejudiced by the operation of the phasing restrictions in draft housing policy H2. The Dec 2023 NPPF (paragraph 33) states ‘policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary’. The Regulation 19 Plan is not technically legally compliant as the review has not been completed within 5 years of the last Winchester District Local Plan Part 1 - Joint Core Strategy Plan adopted in 2013.</p> <p>NPPF paragraph 60 states that it is important that a sufficient amount and variety of land can come forward where it is needed and paragraph 70 also notes that small and medium sized sites can make an important contribution to meeting housing requirements. LPA’s should accommodate at least 10% of its housing requirement on sites no larger than 1 ha unless there are good reasons why this target cannot be achieved.</p> <p>We support the extension of the plan period to 2040 so that it coincides with the 20 year period for assessing housing need in accordance with the standard method. We also support the inclusion of an unmet 1900 dwelling allowance to the standard method housing requirement figure in accordance with duty to cooperate and the identified current unmet needs in the Partnership for South Hampshire (PfSH) area.</p> <p>Although we acknowledge that the allowance for windfalls is relatively modest, windfalls are by definition a declining resource and in a predominantly rural district with other policies that prevent the loss of employment sites to residential, we still believe the allowance is too high. For certainty and deliverability of housing, we would prefer less emphasis on windfalls and more on actual land allocations. We are also unclear on the actual windfall allowance as there is a discrepancy between the figures in table H2 (1895 dwellings) and table H3 (1725 dwellings). We would prefer the use of the 1725 windfall dwelling figure in both tables and the 170 dwelling difference (1895- 1725) added to the additional allocations supply category.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>We would prefer less emphasis on windfalls and more on actual land allocations. We would prefer the use of the 1725 windfall dwelling figure in both tables and the 170 dwelling difference (1895- 1725) added to the additional allocations supply category.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>We are also unclear on the actual windfall allowance as there is a discrepancy between the figures in table H2 (1895 dwellings) and table H3 (1725 dwellings). We would prefer the use of the 1725 windfall dwelling figure in both tables and the 170 dwelling difference (1895- 1725) added to the additional allocations supply category.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Mr & Mrs Painter
<b>Personal reference number</b>	ANON-AQTS-3272-7
<b>Full reference number</b>	ANON-AQTS-3272-7/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Council’s use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years. The Written Ministerial Statement and draft Standard Method and NPPF indicate a clear direction of travel in terms of national planning policy in relation to meeting housing needs. The Minister for Housing and Planning warned Councils that he will intervene if councils produce plans with housing targets ‘way under’ their needs.</p> <p>In Winchester’s case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, which would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan. 3.6 The Council would need to give consideration as to how much of Winchester’s requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. Councils with a “significant gap of over 200 dwellings per annum between the revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF, this would apply to Winchester. The Council should take account of the Government’s new direction of travel and consider whether it should progress to submission or return to an early stage of plan-making.</p> <p>Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized sites forward. The Council have constrained the supply of sites that can come forward in a number of the</p>

	<p>sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Bishops Waltham via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. There are medium sized sites available in these sustainable locations such as Bishops Waltham that could be brought forward quickly to help not only with housing delivery, but also re-enforce the vitality of the settlements and further the creation of quality places. One of these sites is the Land to the South of Tangier Gardens in Bishops Waltham. The non inclusion of this site as an allocation in the emerging plan is considered a flaw and unjustified.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting Document (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/2/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>All housing requirements should be expressed as a ‘minimum’, not ‘about’. Table H2 shows how this quantum has been determined by use of the Standard Method (calculated at March 2024), and an additional allowance of 1,900 for unmet needs in neighbouring authorities. The NPPF confirms the standard method is the starting point for determining housing needs and PPG makes it clear the standard method provides a minimum starting point in determining the number of homes needed in an area.</p> <p>While an additional requirement has been included for unmet needs elsewhere the Council has failed to examine a higher housing need figure given the availability of suitable and viable land. The desire to rush through the Local Plan process should not jeopardise the delivery of homes, particularly in the context of the WMS and the proposed NPPF reforms published in July 2024.</p> <p>The PPG additionally identifies that affordable housing needs can be a consideration in potentially setting a housing requirement over LHN. The Winchester SHMA Update (July 2024) sets out that there has been a significant increase in the total affordable housing need between 2020 and 2024 of approximately 62%. The net need for social/affordable rented housing has increased from 220 to 411 dwellings per annum, and for affordable home ownership from 123 to 147 dwellings per annum. This equates to over 82% of the Standard Method need for the District. This has been defined using an affordability threshold of 30% of gross household income. The PPG does not provide any guidance on choosing an appropriate threshold, MHCLG SHMA guidance in 2007 suggested that 25% of income is a reasonable start point, and that a different figure could be used depending on local housing costs. The ONS estimates in 2022 that renters in the South-east spent 22.1% of their average weekly disposable income on net rent and homeowners 16.2% on mortgage costs. The use of a 35% threshold should therefore be considered a minimum. A lower affordability threshold must not be discounted as there are considerable challenges facing many who spend a higher proportion of their average weekly disposable income on housing costs. Given the current economic market and ‘cost of</p>

living crisis', with lower quartile house prices in Winchester having risen by approximately 11.5% between September 2020 and September 2023; interest rates rising from 0.1% in 2020 to a current rate of 5% (with significantly increased borrowing costs); private rental prices having increased by approximately 7% in the 12 months to February 2024 in the South East, and inflationary pressures, rising housing costs will affect households across the income distribution. They are more likely to disproportionately affect those who already spend a greater proportion of their household spending on housing costs.

The housing requirement has not been positively prepared and must be increased to respond to unmet affordable housing need that is worsening. An increased housing requirement coupled with a wider choice of strategic allocations are required within the Local Plan to ensure a good mix of sites, including those that can be built-out relatively quickly. There is significant reliance on existing permissions and commitments to make up the housing provision. This does not represent positive planning for additional housing needs, neither is there sufficient evidence, such as through a detailed trajectory, to demonstrate the 'carried forward' allocations remain deliverable in the early parts of the plan period. It is unclear where the windfall figure in Table H2 of 1,895 has been derived from. 115 x 15 years remaining on plan period equates to 1,725 dwellings (which is consistent with the figures in Table H3). There is therefore a shortfall of 100 dwellings in Table H2, which must be accounted for. Moreover, the windfall allowance has been applied over a 15-year period, starting from the year 2025/26. Developments that are delivered in the first couple years of the plan period are likely to already be known through planning permissions and as such would be counted as a commitment. To ensure there is no double-counting, a windfall allowance should not be applied for the first three years following the plan's adoption. Using a 12-year period for windfall would result in a total of 1,380 dwellings, further increasing the shortfall to 515 dwellings.

FH do not agree that it is 'not necessary to include a 'buffer' to allow for non-delivery. Fluctuations in the deliverability of sites throughout the plan period as a result of various factors, including market conditions, are inevitable and therefore potential non-implementation of outstanding planning permissions, other commitments and windfall development, cannot be discounted. Additional allocations are required to ensure a 5-10% buffer. The Government are seeking to restore the 5% buffer on housing land supply calculations to account for fluctuations as part of the emerging reforms to national planning policy.

It is unclear how the unmet needs allowance of 1,900 homes has been derived or why a higher quantum has been discounted. The PfSH Spatial Position Statement (SPS) identifies that there were only two authorities in the area (Fareham and Test Valley) able to demonstrate a surplus in housing supply between 2023 and 2036. Overall, across the 10 authorities the shortfall is almost 12,000 homes, a significant unmet need with very limited opportunities within the PfSH area to provide for it. The SPS goes on to identify that only five out of the

10 authorities have the short to medium term ability to meet and exceed standard method-based housing needs in their local plan, Winchester being one of these.

WCC received specific requests from both Havant Borough Council and Portsmouth City Council to assist in delivering their unmet needs which alone total approximately 7,877 dwellings. The contribution of 1,900 represents only 24% of the unmet need from Havant and Portsmouth, without accounting for the wider shortfall in the PfSH area. Winchester is spatially well located to deliver the fullest extent of their unmet needs. The IIA does not test an option with increased housing requirements and supply, neither does it test an option with a higher level of growth through greater strategic allocations in the South Hampshire area, despite the PfSH identification of the east of Botley area of search. WCC have not taken part in meaningful engagement with the neighbouring authorities to determine how they can better contribute towards the unmet needs. The LP and evidence base additionally allow for this unmet need to contribute to other shortfalls. For example, the Housing Topic Paper and SOCG with the South Downs National Park authority acknowledges that any shortfall resulting in the expected housing contribution from the SDNP part of the District (350 dwellings) can be provided for within the unmet needs allowance. This could then reduce the number of dwellings that can contribute towards unmet needs down to just 1,550.

Paragraph 9.17 identifies the area of search east of Botley, as set out in the PfSH SPS, however states that developing site allocation proposals 'will take several years to complete and will be progressed through either a review of this Local Plan or a dedicated Development Plan Document.' There are no reasons why this work would take several years to complete. Significant amounts of available land have been promoted to the Council and assessed. FH have confirmed the availability and suitability of SHELAA site reference CU08, including the submission of technical reports which demonstrate in detail, the site's opportunities and constraints. The opportunities East of Botley, including focusing development on SHELAA site reference CU08, are clear with reference to the transport infrastructure, limited constraints and land availability.

The PfSH 'Broad Areas of Search for Growth Assessments December 2023 report' confirms the identification of Broad Areas of Search for Growth should relate to emerging or future local plans. It is not sound that the Council have not taken the opportunity to deliver on this area of search as part of this emerging plan and provide a valuable contribution to the unmet needs of the wider area. WCC have had ample time and opportunity to assess and deliver on this area of search. Moreover, the Local Plan gives no timescales for a future review or production of a dedicated DPD to deal with the East of Botley area of search. The new standard method proposes an annual minimum housing need figure of 1,099, this is a significant increase of 423 above the existing 676. Annex 1 of the proposed NPPF at paragraph 227 requires that Local Plans reaching adoption with an annual requirement more than 200 dwellings lower than the relevant local housing need figure will be expected to commence plan making in the new system at the earliest opportunity to



	<p>address the shortfall in housing need. Consequently, the Draft Plan must set a higher housing requirement, as it is not positively prepared and justified taking into account the need to significantly boost the supply of housing. The Plan should allocate all deliverable sites in sustainable locations which provide opportunities to access services, facilities and sustainable transport options. SHELAA Site CU08 'CU08 Land at Botley Road, Station Hill' is an available, suitable, and deliverable location for housing for a minimum of 177 homes that should be defined in the Local Plan as an allocation.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Amend 'about' to 'minimum' when referring to all housing requirements.</p> <p>The housing requirement should be increased above the LHN (defined by the current standard method) in order to boost the delivery of affordable housing. The housing requirement and current unmet needs allowance of 1,900 should also be substantially increased in order to maximise opportunities to meet the demonstrable unmet need within the PfSH, including the particular needs of Havant and Portsmouth. This higher growth option has not been tested in the evidence base. The emerging standard method housing need set out in the proposed 2024 NPPF reforms substantially deviates from the current need and requires a significant uplift in the supply of housing. To ensure the WCC Local Plan is positively prepared it cannot ignore the WMS and the thrust of the Government to deliver more homes.</p> <p>The identified area of search 'East of Botley' should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now. SHELAA site CU08 'Land at Botley Road, Station Hill' is an available, suitable and deliverable location for residential development of a minimum of 177 homes that should be defined in the Local Plan as an allocation.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Amend 'about' to 'minimum' when referring to all housing requirements.</p> <p>The housing requirement should be increased above the LHN (defined by the current standard method) in order to boost the delivery of affordable housing. The housing requirement and current unmet needs allowance of 1,900 should also be substantially increased in order to maximise opportunities to meet the demonstrable unmet need within the PfSH, including the particular needs of Havant and Portsmouth. This higher growth option has not been tested in the evidence base. The emerging standard method housing need set out in the proposed 2024 NPPF reforms substantially deviates from the current need and requires a significant uplift in the supply of housing. To ensure the WCC Local Plan is positively prepared it cannot ignore the WMS and the thrust of the Government to deliver more homes.</p> <p>The identified area of search 'East of Botley' should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now. SHELAA site CU08 'Land at Botley Road, Station Hill' is an available, suitable and deliverable location</p>

	for residential development of a minimum of 177 homes that should be defined in the Local Plan as an allocation.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a></p> <p><a href="#">Supporting document 2 (Location Plan)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Illustrative masterplan)</a></p> <p><a href="#">Supporting document 5 (Access and Transport Report)</a></p> <p><a href="#">Supporting document 6 (Landscape and visual study)</a></p> <p><a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a></p> <p><a href="#">Supporting document 8 (Interim Ecology Assessment)</a></p> <p><a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a></p> <p><a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a></p> <p><a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a></p> <p><a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Peter Nicholas Homes
<b>Personal reference number</b>	ANON-AQTS-3292-9
<b>Full reference number</b>	ANON-AQTS-3292-9/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>One of the 3 spatial areas is the 'Market Towns and Rural Area' (MTRA) which is expected to make provision for 3,850 new homes over the plan period. Elsewhere in the Plan the MTRA is referred to as accommodating 3825 homes, including in Policies H1 and H3. Clarification is sought from the Council as to which figure it should be. One of the Larger Rural Settlements is Denmead, a large village, close to Waterlooville with its extensive range of facilities and services. In the Settlement Hierarchy Background Paper it ranks 5th of the 49 settlements in Winchester District in terms of the facilities and services it provides. Denmead seems to be a logical sustainable place to accommodate significant future growth. The Council has limited its ambitions in relation to the Denmead which is only accommodating 330 new dwellings or 8% of the MTRA housing provision.</p> <p>The Council is largely relying on completions, commitments and an existing allocation, to accommodate future growth in Denmead, rather than delivering new sites. Although Denmead is a sustainable location it has been limited by Policies H2 and DEN1 to 100 new dwellings in the plan period, to be delivered through the Neighbourhood Plan process and phased after 2030. There are sustainable sites on the edge of the village that could be brought forward without compromising openness and closing the gap between Denmead and Waterlooville. The Council should reassess the ability of Denmead to accommodate higher levels of housing growth, particularly in light of the need to accommodate acute future housing need. The approach in relation to Denmead is overly cautious and is not considered to be justified or positively prepared.</p> <p>The Council's use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas, is applauded and welcomed. However, the Standard Method is based on the current methodology which the new Government has strongly signalled its intention revise. The Written Ministerial Statement and draft revised NPPF indicate a clear direction of travel in terms of national planning policy. The Government has published tables showing what the new housing need figures would be,</p>

In Winchester's case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, which would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan. 3.6 The Council would need to give consideration as to how much of Winchester's requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. Councils with a "significant gap of over 200 dwellings per annum between the revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF, this would apply to Winchester. The Council should take account of the Government's new direction of travel and consider whether it should progress to submission or return to an early stage of plan-making.

Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized sites forward. The Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area, including Denmead, via limitations on new allocations, phasing restrictions and devolvement of delivery to neighbourhood plans. There are medium and strategic sized sites available in Denmead that could help not only with housing delivery, but also to re-inforce the vitality of the settlement and further the creation of quality places. These sites include Furzeley Golf Course /Denmead Driving Range and Furzehill Farm. Both sites fall within the settlement gap between Denmead and Waterlooville identified in the adopted local plan and re-inforced in Policy NE7 but it is submitted that there are areas in the current settlement gap that do not contribute to openness and its undeveloped character and should not be included in the gap. Furzeley Golf Course/Denmead Driving Range is a 34ha site in Denmead with potential capacity to accommodate a mixed use scheme involving at least 351 homes, extensive green infrastructure and other uses potentially including employment and community facilities. The site contains areas of development and parts that could not be considered open, not fulfilling the function required of it by Policy NE7. It represents a logical southern extension to Denmead and development could be brought forward in a landscape led manner that protects the separate identities of Denmead and Waterlooville, enhances the quality and accessibility of the space between the settlements and assists at a strategic level with providing for additional housing. Most of the site is included in the SHELAA as DEN 22 and DEN 23, a large part of it is identified as being deliverable/developable. Furzeley Village should come forward as a strategic allocation in the emerging plan in the form of a settlement extension, rather than being left to the much slower, piecemeal and less certain Neighbourhood Planning process. The non inclusion of the site as a strategic allocation in the emerging plan and the reliance on a Neighbourhood Plan process that has been limited in scope to 100 units is considered both a flaw and unjustified.

	<p>Furzehill Farm lies to the south of Denmead on Sheepwash Lane and is a medium sized site that is highly developed with a number of buildings and hard-surfaced areas. It is also surrounded by development to the south west and north west of the site and northeast. Although it sits in the Denmead/Waterlooville settlement gap it cannot be considered to be contributing to its open and undeveloped nature. The site is available and, due to its size, could be delivered quickly. The site would assist with meeting high housing needs in the area and its development would not compromise the integrity of the Denmead/Waterlooville settlement gap..</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>In order to make the Plan sound the following modifications should be made to the emerging Plan policies:</p> <ul style="list-style-type: none"> <li>• The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process</li> <li>• Furzeley Village site be included as a strategic mixed use allocation for Denmead</li> <li>• Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030</li> <li>• The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA DEN 22 &amp; 23 lying to the south and south west of Denmead Furzehill Farm</li> </ul>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>In order to make the Plan sound the following modifications should be made to the emerging Plan policies:</p> <ul style="list-style-type: none"> <li>• The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process</li> <li>• Furzeley Village site be included as a strategic mixed use allocation for Denmead</li> <li>• Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030</li> <li>• The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA DEN 22 &amp; 23 lying to the south and south west of Denmead Furzehill Farm</li> </ul>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting document 1 (Commenting on policies and policies map)</a>  <a href="#">Supporting document 2 (Vision document - Furzeley Village, Denmead)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/3/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>BSP supports the use of the SM LHN and the acceptance that some of the unmet need can be accommodated within Winchester district. However, the requirement, and therefore provision, should be far greater. The housing requirement must be stated as a minimum, including the target provision for new homes within each spatial location. It is entirely unacceptable to set the plan period at 2020 for the sole purpose of securing ‘over-supply’ from the last four years. There is no support for this approach in the NPPF, PPG or in the standard methodology; over-supply across previous years does not exist in setting the housing requirement looking forward from 2023. The PPG sets out the standard methodology and in respect to plan-making makes no provision to manipulate a forward looking SM LHN requirement such that is it offset by delivery in past years. The plan must positively address the ongoing affordability challenge, which is, to some extent, reflected in the standard methodology affordability ratio at 1st April 2024, i.e. taking into account past performance. The plan period should be re-set at 1 April 2024 and the housing requirement and provision set from that time. This confirms that the plan fails to make sufficient provision to meet the objectively assessed need (SM LHN + provision for unmet need) as at 1st April 2024, being 1,385 homes short.</p> <p>The SHMA (July 2024) highlights that the district’s median monthly rental values are higher across all types of housing when compared to all other geographies assessed, and critically the median house price was significantly greater in Winchester than for wider comparator geographies. This is a clear demonstration that the local plan needs to be planning for a higher housing need figure, not a manipulated lower one, and also a level above the current standard method. The constrained housing market exacerbates the affordability challenge. In this context, the estimated need for Social/Affordable Rented Housing, according to the SHMA will increase significantly from a current need of 55, to a net need of 368, which is principally the result of 419 newly forming households across the plan area. Given that the viability assessment sets a general affordable requirement of 40%, housing provision is not going to address affordability and an uplift would be fully justified. Specifically, over a 16 year period 2024 - 2040, 6,256 affordable homes are needed. Clearly</p>

affordable provision is highly unlikely to be made on small windfall sites, which means that circa 65% of the total proposed housing land supply from all other sources needs to be secured as affordable. This is unachievable. To meet the SHMA estimate, based on an average of 40% affordable housing provision across the district (which in itself is unrealistic), WDC's supply of larger viable sites would need to be in the region of 16,000 homes (a total supply of more than 18,000 homes across the period 2024 – 2040). The Housing Topic Paper fails to adequately justify, with a clear and robust evidence regarding the capacity of other sources to deliver affordable housing, why a further uplift on the SM LHN is inappropriate in the context of Winchester.

Whilst the PfSHS Position Statement dated December 2023 predates the revised NPPF consultation and proposed new standard method, there is a clear expectation of flexibility in the preferred spatial approach, which can be adjusted to accommodate future Government consultation. The proposed standard method local housing need (and associated percentage uplift) over the current standard method figure for the following adjacent PfSH authorities is:

- East Hampshire: 575 to 1,074 (87% increase)
- Havant: 508 to 874 (72% increase)
- Portsmouth City Council: 897 to 1,098 (22% increase)
- Fareham: 498 to 794 (59% increase)
- Eastleigh: 645 to 902 (40% increase)
- Test Valley: 525 to 921 (75% increase)

Overall, the unmet need across the full PfSH authorities, under the revised SM LHN figures, has increased from circa 12,000 homes to at least 35,000 homes. This is across a 13 year period 2023 – 2036.

It is clear that the Local Plan allowance of 1900 dwellings is disproportionate to the scale and location of the need, particularly noting the requests from both Havant and Portsmouth under the DtC (totalling 7,886 homes: 4,377 from Portsmouth, less 800 provided for in the Fareham plan, and 4,309 from Havant). It has not clear, or evidenced, how this figure of 1,900 homes has been calculated but it has not been identified through the proper and robust process of testing the alternatives, by considering the full scale of the unmet need and the alternatives available to meet that need. It cannot be said that the 1,900 figure has been identified to assist with the unmet need, it is a fall-out from the removal of any flexibility buffer which would have helped Winchester in its meeting its own future needs given the increasingly acute affordability challenge that it was facing and recognised (by anticipating an increase in its SM LHN). The evidence is that far more could and should be done in Winchester to meet the DtC and find the plan sound. This is a strategic issue cutting across a number of important matters; development strategy, housing requirement; site allocations; IIA; DtC. When Winchester decided that the 1,900 figure was not a buffer, but an allowance for PfSH, it did not revisit it IIA, despite that fact that the IIA expressly acknowledged that there was no specific quantum of development or allocations proposed to address the unmet need (see IIA paragraph 4.117). In altering its approach/position on this matter Winchester failed to review its strategy as a result, this approach is fundamentally flawed.

	<p>Whilst Winchester takes the position that this can all be addressed through a local plan review, the need is now. A review could address unmet need across the latter part of the plan period, but there is a significant need now and greater capacity across the southern part of the district, to help meet a greater proportion of that need.</p> <p>Currently, 12% of delivery is allowed for from windfall sites. Whilst BSP acknowledge that windfall sites have a role, a more robust way to ensure the key priority of affordability would be to rely less on windfall sites, and more on site allocations. A significant proportion of the assumed housing delivery is based on existing permissions and allocations. Redressing the flawed approach of accounting for previous over-supply, and spreading the unmet need allowance over the period 2023 – 2038 (127 dpa), based on the current assessment of supply, without any deduction from the over-optimistic assessment of delivery, as set out in the latest Annual Monitoring Report (AMR 2022 / 2023), the land supply position is less than five-years, at circa 4.5 years. Under the revised SM LHN it clearly gets worse. The Housing Topic Paper identifies a five year housing land supply (HLS) of 3,849 homes at 1st April 2024, set against a requirement of 2,536 homes (said to include a 5% buffer), resulting in a HLS position of 7.6 years. The HLS must be demonstrable on adoption of the plan and the supply and trajectory will need to be updated during the examination period, to rebase at 1st April 2025. There are a number of sites which Winchester Council consider to be deliverable, but do not meet the test of the definition of deliverable. An assessment of the current data removes circa 700 homes from the deliverable supply, including sites at Broadway, Alresford, Andover and Winchester. It is imperative that the five-year HLS information is updated to re-base at 1 April 2025, so that a full and proper testing of the position can be undertaken at examination. Clearly, there is an issue with the trajectory which must be addressed through the allocation and release of additional deliverable sites.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The policy should be amended to increase the housing requirement, and associated housing provision, responding positively to the relevant plan period objectively assessed housing need (SM LHN for Winchester plus a specific and enhanced proportion of the unmet need from the PfSH area), and affordability challenge, and allowing for a greater housing distribution across the district to account for the future housing trajectory trend.</p> <p>This needs to be achieved through additional new allocations, reflecting the draft plan’s overreliance on existing permissions and allocations. At the very minimum additional provision should be made for 1,385 homes, reflecting the base-date position on SM LHN and necessary related provision. Further, the Council should look again at sustainable opportunities to create flexibility for its own likely increase in the SM LHN and in response to both affordability and the scale of the unmet need.</p> <p>Also, there is a need to identify additional land which can provide for a deliverable supply, counting towards a satisfactory five-year HLS position.</p>



<p><b>What is your suggested wording or text for the policy?</b></p>	<p>“Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2024 - 2040), including a contribution towards the unmet needs of adjoining areas. The housing requirement across the plan period is a minimum of 16,540 dwellings (to be uplifted further on reassessment of the SHLAA opportunities and IIA). Provision is made to meet this requirement in this period (excluding the South Downs National Park area), by utilising suitable previously developed land within defined settlement boundaries, completion of strategic allocations at Kings Barton (North Winchester), Newlands (West of Waterlooville) and North Whiteley, and delivery of sites allocated within and adjoining the most sustainable settlements, in accordance with the Local Plan’s spatial strategy (set out in Policy SP2). Housing development will be distributed between the three spatial areas as follows:</p> <ul style="list-style-type: none"> <li>i. Winchester Town about 5,640 dwellings (needs to be increased to address SM LHN / affordability)</li> <li>ii. South Hampshire Urban Areas about 5,650 dwellings (needs to be increased to address PfSH)</li> <li>iii. Market Towns and Rural Area about 3,825 dwellings. (needs to be increased to address PfSH)”</li> </ul>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/18/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Referring back to policy SP2, H1 allocates spatial areas as Market Towns and Rural areas as the most sustainable settlements. The settlement hierarchy and transport assessment in the evidence base is flawed and therefore this policy is unsound.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/4/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Housing Topic Paper states the Plan Period start date is 2020 “...to allow some of the Council’s recent good performance in terms of housing completions to be taken into account, as there is no specific provision in the NPPF or Planning Practice Guidance for past over-supply to be taken into account and this would otherwise be lost”. There is no basis for artificially bolstering supply as the Council seeks to do by commencing the Plan period in 2020. The Standard Method utilises population projections alongside housing affordability data (in this case, the median affordability ratio for 2023 which was published in 2024). Including several years of extant housing completions within the Plan period would result in the inclusion of completions that will have (through the mechanics of the Standard Method) also fed into the assessment of local housing need, which the balance of the Period seeks to address.</p> <p>Vistry agrees the Standard Method is an appropriate starting point in accordance with NPPF paragraph 61. However, the Council should also be exploring whether the housing requirement should be higher (paragraph 67) in response to their being a higher identified housing need (the new revised Standard Method would be 21,980). An Affordable Housing Statement is submitted in support of this response. There is an acute shortfall of provision of affordable housing since LPP1 was adopted of -2,311. There is a strong case for an uplift well over the minimum Standard Method figure to promote the issue of unmet affordable housing needs and the general market and rental affordability in the District. The SHMA 2024 document identifies a need for 495 affordable homes annually (368 dpa affordable/rented and up to 127 dpa affordable home ownership). This represents 65.5% of the overall annualised housing requirement (755 dpa) identified for the Plan, which will clearly not be delivered.</p> <p>The draft Local Plan includes a figure of 1,900 to cover unmet need. The PfSh Spatial Position Statement 2023 sets out an overall shortfall of 11,771 dwellings with the ‘broad areas of search’ estimated to have a total capacity of c. 9.700 dwellings. Reliance on future ‘broad areas of growth’ simply pushes the unmet need</p>

to future Plan Periods of the relevant authorities. Portsmouth and Havant have formally requested help to meet their unmet need, with Portsmouth highlighting unmet need of 3,577 homes and Havant highlighting 4,300 homes. These figures are far higher than the shortfalls identified in Table 1 of the 2023 PfSH Position Statement. The apportionment of 1,550 / 1,900 homes to address unmet needs appears inadequate and not clearly justified. Indeed, the Housing Topic Paper (in paragraph 4.52) suggests that the 1,900 figure is simply based on an assessment of available development capacity (i.e. through the SHELAA and Site Selection Paper). There is no consideration of an alternative option where the Plan accommodates (for example) 3,000 to 5,000 additional dwellings to address a greater share of the unmet needs arising within the PfSH area. The revised Standard Method will increase the housing requirement across Southern Hampshire by a huge amount. It is WCC's duty to consider whether they should provide a higher unmet needs allowance, failure to consider this conflicts with NPPF paragraph 26 which requires "on going joint working." The approach to unmet needs is not positively prepared.

Vistry Partnerships agree that the December 2023 NPPF does not require a buffer to be applied, but the proposed strategy for housing supply includes 4,770 homes comprising windfalls and new allocations through the draft Local Plan. The Council should still seek to include a buffer of at least 5% to account for a reduced windfall provision or over-estimation of development capacity of sites. In addition, 6,780 dwellings already benefit from planning permission and it is undoubtedly unrealistic to assume that there will be no lapses within this provision. The draft NPPF 2024 seeks to reintroduce a buffer when assessing five year housing land supply (paragraph 76). Whilst not specifically applying to Local Plan preparation, it sensibly re-emphasises the importance of a buffer in safeguarding against lapsed permissions or over-estimation of capacity.

The strategy is strongly focussed on sites which already benefit from planning permission but which are not yet built out. In addition, a number of formerly allocated sites are to be allocated again. Given some of the sites have been allocated since 2013 and are yet to come forward, it may not be realistic for WCC to continue relying on them as allocations. Overall, 1,055 homes identified within the draft Local Plan were previously allocated in LPP2. Likewise, North Whiteley, Barton Farm and West of Waterlooville were allocated in LPP1 yet only around 2,800 homes have been delivered. Barton Farm remains an allocation for 2,000 homes within the Regulation 19 Local Plan, however, the supporting text states that there are 1,541 dwellings remaining to be developed. This allocation should be changed to 1,541 and an additional 459 homes should be provided for through new site allocations.

The Windfall Assessment Report (2021) identifies a windfall supply of 115 dpa over a 15-year period but it is not clear why the Draft Local Plan should identify a greater annualised windfall supply. More substantively, the analysis in the Windfall Assessment Report appears to overestimate the likely achievable level of supply

	<p>from this source. In addition, the Plan at Table H3 identifies completions achieved in 2019 to 2021 from development of under 10 dwellings have been identified as a source of supply, which equates to 388 homes. Vistry Partnerships do not consider it appropriate to include such completions and it is not clear if an appropriate lapse rate has been applied.</p> <p>A detailed housing trajectory for the Plan is absent from the Plan and its evidence base, so there is no clear position on overall capacity and completion rates. There is no way to assess whether there is sufficient supply to address the proposed housing requirement and no means to test this matter at Examination.</p> <p>A drfat revised NPPF was published on 30 July 2024 and Paragraph 226 is clear that the policies in the new NPPF (once published) would apply from the publication date plus one month. The Council has made a political choice to rush through the plan-making process, to avoid the need to plan for the revised Standard Method figure which is significantly higher than the Housing Requirement set out in the draft plan. If the revised Standard Method figure was used for the Plan Period, it would equate to a housing requirement of 17,584 (based on the Plan commencing in 2024 as recommended) without taking account of any unmet need across the wider south Hampshire region. The Council’s current approach is not positively prepared, nor effective or justified. The Council should seek to future-proof this draft Local Plan by taking the opportunity to do this now, which would assist in ‘...making sure that the right kind of homes are delivered through our planning system as quickly as possible’ (‘WMS’ 30 July 2024).</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Vistry Partnerships questions whether it is possible to render Policy H1 sound, given the extent of concerns identified. However, in summary the following modifications would be necessary:</p> <p><b>Plan Period</b> Vistry Partnership firmly contends the draft Local Plan period should be re-based to the 2024/2025 year, when the plan is expected to be adopted.</p> <p><b>Affordability</b> To meet more of the District’s affordable housing needs (past unmet and future arising) Vistry Partnerships advocate the Council should include further specific site allocations for otherwise suitable, sustainably located sites – specifically at and on the edges of the existing main settlements. Such sites are often in the most sustainable locations and best placed to deliver comparably higher levels of affordable housing toward meeting more of the District’s overall affordable housing needs.</p> <p><b>Duty to Co-operate</b> Further justification and evidence is required from Winchester City Council to ensure the draft Local Plan is positively prepared. It is strongly recommended that WCC provide a proper and robust justification to underpin the proposed size of the buffer, especially in light of the extent of unmet need within PfSH. It is fundamental for WCC to demonstrate collaborative working with neighbouring authorities and that they are</p>

	<p>seeking to meet an appropriate quantum of unmet need assumed through the PfSH Statement of Common Ground. Without this, WCC are at serious risk of failing the Duty to Cooperate requirements.</p> <p><b>Buffer</b>  Vistry Partnerships maintain that at least a 5% buffer be added to the minimum standard method. This would require an additional 678 dwellings and additional sites should be allocated to accommodate for this.</p> <p><b>Windfall</b>  Greater justification should be provided for the windfall assumptions to satisfy the compelling evidence test. In addition, the windfall completions in the past 3 years should be removed from the housing supply as provided for through site allocations.</p> <p><b>Incorporate review mechanism for Local Plan review</b>  In addition, if the Council intends to proceed to Examination (under Regulation 22) with the Draft Plan in its current form, a modification must be included to trigger an immediate review of the Plan following adoption. This must include clear timelines and milestones, and stringent penalties must be introduced if the Council fails to progress to an appropriate plan within a reasonable timescale.</p> <p>Vistry Partnerships' view is that a 'review mechanism' should be introduced into policy, which sets out clear dates for the preparation and completion of a new local plan, and the consequences should those timescales not be met. Bedford Borough Council's Local Plan 2030 provides a good example of such a review mechanism, which Vistry Partnerships would advocate is replicated within the Winchester City Council. In the Bedford Local Plan 2030 example, 'Policy 1 – Reviewing the Local Plan 2030' provides that: 'The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019'.</p> <p>This example review policy was included within the Bedford Local Plan 2030 due to similar circumstances, wherein the NPPF (2019) was adopted during the plan-making process, which introduced the Standard Method. The Winchester City Council Local Plan should be amended to introduce a similar review mechanism to ensure the new NPPF, and the updated standard method, is taken into account swiftly.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The issues raised go to the heart of the Plan and its soundness and cannot be resolved by simply including amended wording. Instead, the Plan's strategic approach to identifying and addressing the housing requirement with suitable supply should be reconsidered. This is essential for the Plan to be consistent with national planning policies, positively prepared, justified and effective to ensure it is sound and justified.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base - includes tables)</a> <a href="#">Supporting document 1 (Affordable Housing Statement)</a> <a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a> <a href="#">Supporting document 3 (Vision Document 2)</a> <a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a> <a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	South Downs National Park Authority (SDNPA)
<b>Personal reference number</b>	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)
<b>Full reference number</b>	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/6/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>As set out in the Statement of Common Ground, there is currently uncertainty over the scale of housing development expected within the South Downs National Park part of Winchester District, due to the early stage of the South Downs Local Plan review. As per the latest South Downs Local Development Scheme, the review is anticipated for Reg18 in early 2025, Reg 19 in early 2026, Submission in 2026, and Adoption in 2027. At present, WCC estimates that about 350 dwellings (2020-2040) could be delivered in the SDNP part of Winchester District, whereas the SDNPA currently estimates about 250 dwellings. This delivery is subject to satisfactory mitigation for phosphates as the area is affected by nutrient neutrality.</p> <p>It is agreed that both WCC and the SDNPA will work together to seek to meet the housing needs of the area where this is compatible with the purposes of the National Park. WCC's approach towards providing an 'unmet needs allowance' to help contribute towards unmet needs elsewhere, if possible, is supported by the SDNPA. The authorities agree that part of this could be used, if necessary given current uncertainty, to resolve potential shortfalls in provision within the SDNP part of Winchester District.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session



<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Email (Commenting on NE8)</a> <a href="#">Letter (Commenting on policies)</a> <a href="#">Email correspondence (Re policy NE8)</a></p>
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<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Gleeson Land
<b>Personal reference number</b>	ANON-AQTS-3299-G
<b>Full reference number</b>	ANON-AQTS-3299-G/6/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The local plan has not done enough to test its ability to meet the unmet housing needs of the PfSH and as such, the housing requirement in Policy H1 is not sound as it has not been positively prepared. We also consider this amounts to a failure of the duty-to-cooperate.</p> <p>The broad scale of unmet housing need has been known since at least 2016 and, over the various iterations of the SPS and SoCG, the unmet housing need figure has never been lower than 10,750 homes. Whilst the council maintains that the unmet housing needs position of the PfSH area collectively is uncertain, this is not true in the context of the above. There have been two specific requests made of Winchester to meet unmet housing needs, from Portsmouth and Havant. The Council states that it is unable to say how much unmet need it can take until work on the Reg 19 plan is complete and, in any event, the PfSH agreed SPS 2023 to meet housing shortfall in the South Hampshire area is the best approach in supporting any unmet housing need arising. Subsequently, the Council was able to find some extra capacity to meet some unmet housing needs, but this is an incidental outcome of the preferred spatial strategy and extending the plan period back from the base date of the assessment of need. The Winchester Local Plan has never tested through scenarios in its IIA 2022 or 2024 how much unmet housing need it could accommodate from the PfSH, this falls foul of the NPPF paragraph 26.</p> <p>The Reg 18 IIA (October 2022) tested four scenarios which all tested the impacts of delivering 14,000 homes. Option 1a came later and assessed the impact on delivery of 15,620 homes. As stated above, a headroom/buffer was built in to allow any further changes to the standard method and any potential unmet need arising from the PfSH. The Council has not tested anything in its IIA 2022 or 2024 to demonstrate it cannot deliver any more than 15,620 homes. This is despite it being very clearly established for some years that unmet need in the PfSH is in excess of 10,750 homes at least, and two formal requests to meet unmet</p>

	<p>housing needs from Portsmouth and Havant. It would appear that even as the plan has progressed, the Council has been unwilling to revisit its spatial strategy to seek to meet any unmet needs from PfSH.</p> <p>Further, while the Council claims it has tested reasonable alternatives and it only needs to pursue an appropriate strategy and not the most appropriate strategy, the alternatives tested are not reasonable. A reasonable alternative would test how much of the unmet need from the PfSH area could be met, not the amount that can be met in pursuing their pre-determined spatial strategy. It is also not effective, whilst it might be based on joint working on cross-boundary strategic matters, it is very clear in this local plan the issue of unmet housing need has clearly not been dealt with and has been deferred to the medium to long term, precisely the opposite of what the NPPF requires. The Council's stance of saying it can only judge its approach to unmet need after the Local Plan reveals the inadequacies of the exercise. With regards to the duty-to cooperate, the approach is not constructive in the context of section 33A of the Planning and Compulsory Purchase Act 2004.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The IIA for the local plan needs to be revisited to assess reasonable alternatives which would definitively conclude how much of the PfSH unmet housing need could be accommodated in Winchester. Not incidentally how much can be delivered based on the preferred spatial strategy.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>N/A – the basis on which the policy is written is unsound.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Mark Behrendt (HBF)
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/4/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>HBF are concerned that Councils such as WCC will, in the face of increases in its housing needs, seek to move quickly to submission in order to benefit from the transitional arrangements. While the proposed amendments can only be given limited weight with regard to the local plan at this point in time, it is important to note that inspectors are already asking local plans at examination for comment on the proposed changes and the Written Ministerial Statement ‘Building the Homes We Need’ that was published early this year and it will be necessary for WCC to consider the implications of the changes with regard to this local plan. The proposed standard method would see Winchesters housing needs increase from 676 dpa to 1,099 dpa and will require the council to prepare a new plan immediately. Therefore, a strong review policy is required that set out clear dates as to when a new plan will be submitted, and the consequences should that plan not come forward in the agreed timescale.</p> <p>While HBF welcome the Council's decision to meet some of the unmet housing needs arising in the South Hampshire Sub Region this does not go far enough given the scale of the shortfalls. It would appear that limited discussion has taken place between Winchester and those council's expected to have shortfalls. It would appear that the Council have not grappled with the actual scale of the unmet needs in Havant, and indeed elsewhere in South Hampshire, and have instead moved forward with their proposed spatial strategy using the buffer as a means to address some of the unmet needs in the sub region but not revisiting their strategy to see if they could do more. The Council will need to engage properly with the neighbouring authorities who cannot meet their needs prior to the submission of the local plan given that failing of co-operation cannot be rectified prior to submission. They will also need to take into account the impact of the proposed standard method on unmet needs in neighbouring areas. Across South Hampshire the standard method would see the minimum expectation for new homes increase from 6,865 dpa to 9,987 dpa. Taking Havant as an example the housing need would increase form 508 dpa to 874 dpa and a shortfall across their plan period of 2022/23 to 2042/43 of 11,469 homes, based on the estimates of supply in the SoCG.</p>

The lack of direct consideration of the unmet housing needs in other areas can also be seen in the Integrated Impact Assessment (IAA) and the reasonable alternatives considered. The decision not to consider unmet needs of other areas at the start of the plan making process is noted in paragraph 2.33 of the IAA which states that “At the time of preparing the Strategic Issues and Priorities document and Regulation 18 Local Plan, the options considered related to meeting the needs of Winchester District, not the unmet needs of neighbouring authorities.” While the Council then went on to consider options that were higher than what was needed it is not clear that these were in a direct response to the unmet needs in other areas or just an outcome of the spatial strategies being proposed and that they in turn resulted in a “buffer” between needs and supply. What has not been tested in the IAA was an alternative that considered a greater response than to the significant unmet needs elsewhere. Such a spatial strategy would have been a reasonable approach to consider and points to the Council not actively seeking to consider and address the needs of other areas through this plan.

Policy H1 should recognise the housing requirement is a minimum figure and HBF suggest that the policy is amended to “Provision will be made for a minimum of 15,115 homes”. HBF do not agree with the Council’s decision to use a plan period that starts in 2020 to allow high levels of recent delivery to be taken into account in this local plan. Such an approach fundamentally misunderstands the standard method which takes account of past supply through the affordability uplift to determine housing needs moving forward. The uplift in housing delivery will to some extent take into account past over supply in that it will have increased supply in the market potentially limiting increases in houses prices in Winchester and reducing the housing needs assessed using standard method. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. In order to be consistent with national policy and sound the Council should amend the plan period to start in 2024.

HBF consider the unmet needs in South Hampshire to warrant a higher response from Winchester. The SoCG with the Partnership for South Hampshire includes Table 1 which shows that there is a shortfall of over 14,500 homes across the South Hampshire sub region. It should also be recognised that this level of unmet needs is likely to increase should the proposed amendments to the NPPF and Standard Method be adopted. Using the evidence on supply in Table 1 for those authorities wholly within the South Hampshire sub region the shortfall using the new standard method would increase from 13,465 homes to 38,704. Whilst this is an assessment is based on relatively out of date information and a plan period that is not consistent with national policy, it does provide an indication of the scale of the issue facing this area in the short term and indicates that WCC need do more through this local plan. Within this region the constraints facing authorities are one of geography rather than planning designations. The boundaries for these areas are either coastline or tightly drawn to their urban edge leaving limited opportunities for growth. When designation such as the national

park are taken into account this means that those areas where development is relatively less constrained, such as WCC, must do more to ensure housing needs are met in full.

HBF do not consider the plan period to be sound and should start in 2023/24, which would mean that total housing needs would be 13,392 homes over a 17-year plan period based on the LHNA of 676 dpa plus 1,900 homes to address unmet needs in neighbouring areas. From this figure the 350 homes that it is assumed to be delivered in the SDNP are removed leaving a total of 13,042 homes to be delivered over the revised plan period. However, based on the figures in Table H2 of the local plan the Council expect 12,295 homes to be delivered over this time frame – a shortfall of 747 homes. Therefore, the Council will need to identify additional sites to be allocated in this local plan in order to meet its own housing needs as well as the unmet needs arising in neighbouring areas that it has committed to delivering. If the proposed plan period were to be considered sound then HBF remain concerned given that the difference between needs and supply is just 321 homes, around 2% above the housing requirement. Given that there is inevitable uncertainty as to when development may come forward it is necessary to have a reasonable over supply of homes across the plan period to ensure needs are met in full, the HBF would suggest that that Council should plan for at least 10% more homes than is required.

It is difficult to comment on the deliverability of the council's housing supply as limited detailed evidence has been presented. HBF would have expected the council to provide a detailed trajectory which should have been available as part of this consultation and as such HBF reserve the right to comment in more detail at the examination in public. Looking at the evidence in the SHLAA 2023 HBF are concerned that some of the assumptions appear optimistic. For example, the Sir John Moore Barracks (policy W2, SHELAA ref LH05) is expected to deliver 600 homes in the first five years of plan post adoption. In order to achieve this level of housing delivery the development would need to commence delivering homes in the first year after expected adoption of the plan at an average rate of 120 dpa. HBF recognise that this is just one site, but it would appear from the SHELAA that the council are being very optimistic in its assumptions and further evidence will need to be provided that its delivery expectations for each site required to meet housing needs is clearly presented and justified.

In addition, the Council have also failed to include a housing trajectory in the local plan itself, as is required by paragraph 75 of the NPPF. The only trajectory HBF could find was Appendix 5 in the Housing Topic Paper and this should be included in the local plan. However, even Appendix 5 of the Housing Topic Paper, is not consistent with the local plan itself stating that total supply would be 15,441 homes in total and 12,277 between 2023/24 and 2039/40. While these are not significant discrepancies HBF would have expected some consistency and the Council must amend the local plan to include an accurate trajectory that is consistent with its own evidence.

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (copy of form - refers to letter)</a>  <a href="#">Letter (Commenting on policies and evidence base)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Vistry Group (land at Fairthorne Grange Farm and Brindle Farm, Curbridge, Whiteley)
<b>Personal reference number</b>	ANON-AQTS-32UE-R
<b>Full reference number</b>	ANON-AQTS-32UE-R/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>H1 is unsound on the basis that it fails to plan positively to fully meet the evidenced scale of local housing need – in particular the unmet needs arising in South Hampshire. In a WMS ‘Building the homes we need’ dated 30 July 2024, the new Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government confirmed the continued operation of the duty to cooperate. The WMS expresses a strong policy direction which should be accorded great importance. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through statements of common ground). Havant Borough Council’s statement implies that Winchester City Council has failed to plan positively in respect of unmet need, particularly in view of the very high level of unmet housing need in Havant Borough at the date of the agreement. Assuming the forthcoming introduction of the new standard method these already high levels of unmet need are set to increase substantially. The statement of common ground with Portsmouth City Council dated August 2024 also suggests that the issue of unmet needs is not fully addressed.</p> <p>Whilst paragraph 9.16 of the Regulation 19 Plan references making an unmet needs allowance “in the spirit of co-operation required by government policy”, the scale of this allowance does not go far enough in the face of the known scale of unmet need and likely increase to housing numbers being proposed through a revised standard method. Winchester City Council has proposed an unmet needs allowance for neighbouring authorities of 1,900 homes which is disproportionate to the scale of the need. For example Havant Borough Council identifies an unmet homes figure of 4,309 dwellings and Portsmouth City Council identifies an unmet need figure of 4,377 homes (of which 800 homes is provided for in the Fareham Borough Local Plan). The tone of paragraph 9.17 of the plan which refers to “ongoing unmet need” and planning “in the long-term” suggests a lack of urgency to address important matters that are at the heart of the duty to co-operate. Indeed ‘East of Botley’ if brought forward may ultimately be required to meet Winchester district’s own needs rather than playing any role in relation to unmet needs given a new standard method-derived target.</p>



	<p>The plan period should be re-set at 1 April 2024 and the housing requirement and provision set from that time. It is not acceptable to set the plan period at 2020 for the sole purpose of securing ‘over-supply’ from the last four years. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method.</p> <p>Having regard to Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, it is clear that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities, the phasing of the new greenfield allocations in Winchester District into the second half of the plan period is unnecessary. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - provision must be made in this plan for additional strategic allocations which would promote and maintain higher levels of dwelling completions.</p> <p>Vistry Group has promoted its land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road through earlier stages of plan making, including the preparation and submission of a Vision document which outlines the opportunity on this 23.8ha site adjoining North Whiteley. The site is referenced as CU32 in the Strategic Housing and Economic Land Availability Assessment 2023 as ‘deliverable/developable’ with an indicative capacity of 356 homes and the Vision document for Vistry presents a concept with the potential to deliver around 430 homes. The site is part of a wider area at North Whiteley that has seen recent infrastructure investment, and will see further investment, and the opportunities associated with this should be optimised. It is urged that this site CU32 be allocated now as part of a strategy that can deliver and maintain an upward housing trajectory and better address need arising in South Hampshire as part of the duty to co-operate. The justification for this additional strategic allocation relates in particular to the scope for the district to contribute more to address the (growing) unmet needs in the Partnership for South Hampshire (PfSH) area, but also to provide greater flexibility in the event of any non-delivery experienced on allocated sites, to ensure that the policy is positively prepared and remains effective over its period.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The overall number of homes to be planned for in Winchester district must be increased.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Wording not supplied, however the overall number of homes to be planned for in Winchester district must be increased to reflect the concerns expressed in Vistry Group representations</p>

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Shorewood Homes
<b>Personal reference number</b>	ANON-AQTS-32UC-P
<b>Full reference number</b>	ANON-AQTS-32UC-P/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The growth focus in Winchester Town is supported, especially in light of the new Government’s ambition to deliver 1.5 million new homes across the country in the next five years and Winchester’s historic role as an important sub-regional centre. However, the Plan is not ambitious enough in relation to the level of housing growth to be accommodated in Winchester Town on small to medium sites.</p> <p>The Council’s use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years. The Written Ministerial Statement and draft Standard Method and NPPF indicate a clear direction of travel in terms of national planning policy in relation to meeting housing needs. The Minister for Housing and Planning warned Councils that he will intervene if councils produce plans with housing targets ‘way under’ their needs.</p> <p>In Winchester’s case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, which would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan. 3.6 The Council would need to give consideration as to how much of Winchester’s requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. Councils with a “significant gap of over 200 dwellings per annum between the revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF, this would apply to Winchester. The Council should take account of the Government’s new direction of travel and consider whether it should progress to submission or return to an early stage of plan-making.</p>

	<p>Para 70 of the current NPPF (Dec 2023) recognises that small and medium sized sites can make an important contribution to meeting the housing requirements. Authorities are asked to support the development of windfall sites through their policies and decisions, with compelling evidence that they will be a reliable source of supply. One of the largest recognised sources of supply for Winchester Town is windfall, providing 1,035 dwellings or 18% of the supply. The inclusion of this substantial windfall allowance has been justified through the Assessment of Windfall Trends and Potential which identifies that an average of 88 dwellings per annum over the 2012 – 2019 period came from windfall sites, making up over half the total of the Winchester Town completions. If the 88 dpa windfall figure was multiplied over the plan period this would give a total windfall supply of 1,760. This is a much lower figure than the 1035 dwellings identified in Para 12.4 amounting to over 700 less.</p> <p>On this basis the Council have taken a very conservative approach to windfalls which is not considered justified. Shorewood Homes support the inclusion of a high windfall allowance for Winchester Town. The detailed justification for the allowance is welcomed and it is considered that compelling evidence for their inclusion in Winchester Town’s supply exists. However, the Council has been overly cautious in its assumptions about the amount of supply from windfall as the historic figures have shown a far higher annual contribution from this source. In terms of soundness and justification, Strategic Policies SP2, H1 and H3 should be strengthened by increasing the level of windfall allowance for the Town.</p> <p>Shorewood’s 3ha proposed residential redevelopment site at Pitt Manor, Romsey Road, Winchester for 48 net new homes is evidence that this form of development will continue to be a reliable source of supply for the Town. The Pitt Manor site is considered to be a suitable and deliverable site capable of bringing forward a high quality development in a highly sustainable location. A recent pre-application meeting confirmed that the principle of the site was acceptable. The Pitt Manor site supports the Council’s and Government’s strategy to bring forward urban small/medium sites on a quick basis, enabling timely delivery to meet acute needs. It also responds to the Council’s objectives regarding climate change mitigation and reducing carbon footprints. On this basis, it is considered to be a suitable site for contributing towards Winchester Town’s future windfall supply.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Barwood Land objects to Policy H1 as it is considered unsound. Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) for a full response and justification behind this objection.</p> <p>The total district housing requirement put forward in Policy H1 is not sufficient to meet the housing need based on the current SM, let alone that suggested in the impending SM update which will significantly increase the housing requirements for the district. The Council is looking to fast-track the Local Plan to examination, and thus avoid the consideration of this matter now. For Winchester, whilst it has reached the Reg 19 stage in the Local Plan process, the updated SM would result in an additional 423 annual requirement (increasing from 676 dwellings under the current SM to 1,099 dwellings under the revised SM), which is more than double the 200 a year threshold. Even if the council do manage to rush its plan through to examination and it is found sound, national policy would require that it be immediately revised because its housing requirement is over 200 dwellings pa below what the new SM requires.</p> <p>Our objection to Policy H1 is therefore focused on the proposed housing requirement set out in the policy because it is so significantly below that required to meet the need set out in the updated SM. This will have significant consequences for the LPA and important decisions regarding the spatial implications of this should not be ignored. This will undoubtedly mean allocating increased growth to smaller settlements outside of Winchester City including sustainable Intermediate Rural Settlement's such as Otterbourne. Fast tracking the Local Plan to examination also raises significant risks in not robustly addressing the concerns raised through the Local Plan consultation process. If the Council submit the Plan for examination in time for it to be examined under the existing NPPF, then the Plan will only just cover the bare minimum 15 years from adoption. Given this point, it is considered appropriate to further extend the plan period, to allow for any delays in the process, and to ensure the 15 years at least is covered.</p>

The Council has updated the figures to take account of the latest published SM (as of March 2024) but has disregarded the proposed changes to the SM and significant additional annual requirement to be met by the district. The significant increase in the housing requirement that the emerging SM suggests is considered to more than justify progressing an alternative approach which would appropriately address affordability concerns and the Government's growth agenda by increasingly the housing requirement to reflect the proposed updates to national policy.

The proposed amendments to the NPPF and SM can be seen to be a direct result of issues facing Councils such as Winchester, an area with significant affordability concerns. The SHMA Update 2024 states in para 2.6 that the median house price in the Winchester District in 2023 was £494,475, up from £410,000 at the year ending March 2019 (as referenced in the SHMA 2020) a 20% increase in 5 years. As acknowledged in the SHMA this is circa 25% above the South East equivalent and 52% above that for England as whole (at £290,000). The graph included in figure 2.3 of the 2024 SHMA presents the workplace based price to income ratio and highlights that as of 2023 this stood at 13.19 for Winchester (up from 12.25 in 2018). As set out in the 2024 SHMA's Summary and Conclusions (para 7.1 and 7.2), Winchester remains "significantly less affordable overall when compared to the County, Region, and Country as of 2023, with a tight rental market adding to affordability pressures in the City" (para 7.1). Affordability is clearly a growing concern for the district which is not being addressed under the current spatial strategy and unlikely to be addressed under that put forward for consultation.

Regardless of whether the proposed changes to the SM had come about, the housing numbers proposed under the Reg 19 Local Plan would be too low. In terms of the unmet need of neighbouring authorities, whilst the buffer included in the housing requirement is now referred to as "Unmet Needs Allowance (for unmet need in neighbouring authorities)" as opposed to the Reg 18, which referred to this as "Standard Method changes / unmet need in neighbouring authorities", it has been increased from 1,450 to 1,900. This increase is marginal and considered to be insufficient to meet the acknowledged unmet need of neighbouring authorities. This also takes off any consideration of potential future SM changes, which are evidently going to have a significant impact not only on the level of need across the district, but also on the level of unmet need in adjacent authorities such as Portsmouth and Havant. Based on the March 2024 SM, several authorities within the Partnership for South Hampshire (PfSH) had confirmed they are unable to meet their SM housing needs in full and would therefore be looking for other authorities in the PfSH to assist in dealing with their unmet need under the Duty to Cooperate (DtC). This issue pales into insignificance when considering the impact of the SM update across the PfSH. Even taking into account the reduced housing need for Southampton, other PfSH authorities have seen significant increases in their housing need with the total annual requirement covering the Authorities of Southampton, Portsmouth, Eastleigh, East Hampshire,

	<p>Fareham, Gosport, Havant, Test Valley and New Forrest increasing from 6,189 under the current method to 8,888 under the proposed SM. Whilst some Authorities may be able to meet the increased need within their local authority area, various authorities in particular Portsmouth and Havant, have already confirmed under the DtC that they cannot meet the existing SM figures and will be looking for other authorities to meet their acknowledged shortfall.</p> <p>The Council also remains too reliant on several strategic sites including West of Waterlooville, North Whiteley and North of Winchester which account for over 5,000 dwellings. By not including a non-delivery buffer they also fail to take account changing circumstances in terms of the economy and other external factors. Indeed, the Council is still in the process of dealing with the impact of Natural England’s requirement for nutrient neutrality, which has, and will continue to impact housing delivery across the district. Just because sites have planning permission does not necessarily provide, as the Council suggests “a high level of certainty over the delivery of this additional housing” within the plan period. This is not a robust approach and a non delivery buffer should be included to the overall total</p> <p>Policy H1 is considered unsound as it has not been positively prepared or seek as a minimum to meet the area’s objectively assessed needs, and the approach taken is also not considered to be justified based on the proportionate evidence available. This would require a significantly increased Total District Housing Requirement to accommodate the additional 423 annual requirement set by the proposed SM update, equating to circa 23,079 dwellings (when incl. 5% buffer); which is an additional 10,144 dwellings over the plan period; alongside a robust buffer, which takes account of the additional needs of neighbouring authorities (via the DtC) and accounts for non-delivery.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H1 is therefore considered unsound as it has not been positively prepared or seek as a minimum to meet the area’s objectively assessed needs, and the approach taken is also not considered to be justified based on the proportionate evidence available. In terms of potential modifications to meet the increased need, this would require a significant uplift to the buffer; or an additional buffer to deal solely with potential increased need associated with future SM updates. Acknowledging, this would in turn have significant implications for other policies within the Plan.</p> <p>This would require a significantly increased Total District Housing Requirement to accommodate the additional 423 annual requirement set by the proposed SM update, equating to circa 23,079 dwellings (when incl. 5% buffer); which is an additional 10,144 dwellings over the plan period; alongside a robust buffer, which takes account of the additional needs of neighbouring authorities (via the DtC) and accounts for non-delivery.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>In terms of potential modifications to meet the increased need, this would require a significant uplift to the buffer; or an additional buffer to deal solely with potential increased need associated with future SM updates. Acknowledging, this would in turn have significant implications for other policies within the Plan.</p>



	This would require a significantly increased Total District Housing Requirement to accommodate the additional 423 annual requirement set by the proposed SM update, equating to circa 23,079 dwellings (when incl. 5% buffer); which is an additional 10,144 dwellings over the plan period; alongside a robust buffer, which takes account of the additional needs of neighbouring authorities (via the DtC) and accounts for non-delivery.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a> <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a> <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a> <a href="#">Supporting document 3 (Preliminary Flood Risk and Drainage Review)</a> <a href="#">Supporting document 4 (Heritage Appraisal)</a> <a href="#">Supporting document 5 (Map - Compliant Site Access)</a> <a href="#">Supporting document 6 (Local Plan Site Promotion - Transport)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	ANON-AQTS-32UJ-W
<b>Full reference number</b>	ANON-AQTS-32UJ-W/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Strategic Policy H1 seeks to deliver a housing provision of around 15,115 dwellings between 2020-2040 through prioritising the approach of distributing development to a sustainable hierarchy of settlements. Within southern Hampshire the draft plan acknowledges there are several authorities that appear to be unable to meet their housing requirement, the PfSH has published a Spatial Position Statement to address these shortfalls. The partnership is taking a two stage approach which involves Winchester exceeding their requirement.</p> <p>Gladman support the use of an unmet needs allowance in aid of supporting its neighbouring authorities, and believe the plan is positively prepared. Nonetheless, the housing provision is based on the standard method from the adopted NPPF, and the emerging NPPF takes a stock-based approach to determine housing requirements. The proposed changes would increase the requirement to 1,099 dwellings per annum as opposed to the adopted requirement of 676 dwellings per annum. Gladman understands the emerging NPPF is not currently at the point of adoption, however, suggest sites in Policy H2 phased supply be brought forward to ensure the Council continues to meet their housing land supply targets.</p> <p>As the housing requirement is increased to reflect Winchester's neighbouring authorities, Gladman consider that the Council should identify and plan for additional housing supply (provision) above their housing need figure. At present the Council have identified enough housing provision to meet the housing need figure, however this is inclusive of an 1,895 dwelling contribution from windfall development. Windfall sites by definition are unidentified and while the Council has provided some evidence justifying the proposed allowance, there is a potential that such sites may not come forward, particularly if market signals and circumstances present viability issues. In addition, given the scale of strategic development and brownfield sites within the emerging Local Plan there is potential for delivery issues to occur (these are discussed further in relation to Policy H2).</p>
<b>What modification(s) are necessary to make the</b>	

<b>policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Vistry Group Ltd
<b>Personal reference number</b>	ANON-AQTS-32N1-W
<b>Full reference number</b>	ANON-AQTS-32N1-W/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	See full response emailed to policy team - section 2. In summary, WCC is commended for committing to both provide sufficient housing to meet their housing need as it stands now and make a contribution towards the unmet needs of neighbouring authorities. However, WCC's commitment to provide 1,900 homes above their Standard Method need is positive but does not go far enough given the significant unmet needs in the South Hampshire region of at least 11,771 homes to 2036.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Consider further strategic allocations to boost the supply of housing in the South Hampshire region particularly given the significant reduction in housing trajectory at the end of the plan period. The PfSH has already identified land east of Botley as a suitable growth area and this should be explored as soon as possible. If the current proposed housing number is accepted, a review of the plan should commence immediately on its adoption to proactively bring forward new strategic sites such as the land at Raglington Farm, east of Botley. This should be written into the plan. Additional information submitted.
<b>What is your suggested wording or text for the policy?</b>	See above - reconsider extent of housing requirement and/or require immediate review of plan on adoption to bring forward new strategic allocations such as land east of Botley. See full response emailed to policy team, additional information submitted.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Letter (Comments on housing requirement and opportunity at Raglington Farm)</a> <a href="#">Supporting Information (Raglington Farm site location plan)</a>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Thomas Hutchinson
<b>Personal reference number</b>	ANON-AQTS-329E-V
<b>Full reference number</b>	ANON-AQTS-329E-V/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The windfall development figure of 1,895, set out in Table H2 is not sound as it is based on unjustified assumptions in the 'Assessment of Windfall Trends and Potential' report of 2021. This work extrapolate past trends of redevelopment of commercial uses and conversion which do not take account of the current lack of non-residential sites within in rural settlements other than the vital services and facilities that need to be retained in their current use. In the past, the redevelopment of redundant commercial/leisure uses and undeveloped land contributed the largest number of completions of the windfall types as set out in Figure 6 but there is no credible reason to think that these sources can realistically continue to yield new housing at the same rates within rural settlements up to 2040. There should be a much more cautious approach to this source of supply going forward; it is highly risky for the Plan to avoid sufficient allocations in the rural areas because of these assumptions. It risks failing to provide a framework for meeting housing needs and addressing other economic, social and environmental priorities of the rural areas as required by paragraph 15 of the NPPF. As such, we believe the approach to housing provision is not consistent with national policy; nor is it justified, having regard to the reasonable alternatives and evidence available to the Council. It may also not be effective, in that it does not result in a deliverable plan should the windfall provision dry up.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There should be a reduced windfall component within the housing supply of Table H2 that should require a corresponding increase in the additional allocations made in this Local Plan.
<b>What is your suggested wording or text for the policy?</b>	Table H2 Windfall development 948 Additional allocations made in this Local Plan 3,822
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/3/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The policy identifies the Plan period as 2020-2040 but the NPPF is clear that a Plan’s strategic policies “should look ahead over a minimum 15-year period from adoption”. NPPF paragraph 69 also indicates that Plans should identify a pipeline of deliverable and developable sites for 15 years, starting at the point of adoption. NPPF paragraph 77 refers to past shortfalls or over-supply but the Planning Practice Guidance (PPG) was never amended this way. Additionally, the revised NPPF proposes to remove any potential for offsetting over-supply, both in Plan-making and in the calculation of a rolling 5YHLS. Including several years of extant housing completions within the Plan period would result in the inclusion of completions that will have (through the mechanics of the Standard Method) also fed into the assessment of LHN, which the balance of the Period seeks to address. The Plan period should commence from 2024, reflecting the most recent evidence-based assessment of housing needs presented in the SHMA Final Report (July 2024). The currently proposed approach is not positively prepared, justified, effective, or consistent with national policy.</p> <p>The Standard Method represents an appropriate approach to identifying the current minimum level of housing that must be planned for. However, the revised Standard Method 1,099 dpa figure, as envisaged in the Government’s consultation, would equate to 21,980 homes if applied over the whole of the Council’s proposed 20-year Plan-period. Even in the scenario where the Plan progresses quickly through Examination and is found ‘sound’ against the current NPPF, the Council cannot escape the possibility of an immediate review, where the new Standard Method figure will be applied. The above provides a strong reason for future-proofing the Plan (through additional allocations) against the pending uplift in the assessed level of housing need. In any case, the current Standard Method figure should be seen as a minimum (as per NPPF paragraph 61), and the Council should explore whether the housing requirement should, in any case, be higher (as per NPPF paragraph 67).</p>



The under-provision of affordable homes (and worsening housing affordability levels) provide one reason for exceeding the minimum standard method figure. The median (workplace-based) house price affordability ratio for the District is 13.32, having risen from 9.93 in 2013, and 5.62 in 1997. For comparison, England's latest (2023) ratio stands at 8.18. A similar pattern is reflected in lower quartile affordability ratios, with the 2023 figure for Winchester District being 12.05 compared to 7.25 across England as a whole. Indeed, the comparative unaffordability of housing within the district is certainly acknowledged at Figure 2.3 of the SHMA 2024 Update. The SHMA 2024 identifies a need for 510 affordable homes annually (368 dpa affordable/rented and up to 142 dpa affordable home ownership), 67.5% of the overall annualised housing requirement (755 dpa). This level of affordable housing need will not be delivered as Policy H6 proposes an affordable housing tariff of between 25% and 40% for new housing developments, pointing to the need to increase the housing requirement further to unlock additional affordable housing.

However, the PfSH Spatial Position Statement (December 2023) identifies an overall shortfall of 11,771 dwellings, and the 'board areas of search' identified by the Partnership are only said to have capacity for around 9,700 homes. Reliance on broad areas of search (with a focus on very large strategic development sites) is likely to push back the timescales for addressing unmet housing needs. Winchester's Draft Local Plan anticipates the matter will be addressed via a future Local Plan Review. Moreover, the scale of housing needs arising in the PfSH area will rise by orders of magnitude should the Government's revised NPPF and Standard Method be implemented. The combined revised Standard Method figure for the 10 PfSH Authorities that signed the Spatial Position Statement would rise from 6,865 dpa to 9,987 dpa, an increase of 3,122 annually, 46,830 over 15 years, or 62,400 over 20 years. Portsmouth and Havant have both requested that Winchester assist in meeting their unmet needs, identifying unmet needs of 3,577 and 4,300 homes, respectively (and 7,877 homes in total). Given the above, the apportionment of 1,550 / 1,900 homes to address unmet needs appears inadequate and not clearly justified. There is no consideration of an alternative option where the Plan accommodates (for example) 3,000 to 5,000 additional dwellings to address a greater share of the unmet needs arising within the PfSH area. The Plan area is relatively unconstrained compared to other Local Authorities within the south of Hampshire, suggesting further sustainable opportunities for meeting needs could be found.

The Plan is expected to be adopted following the implementation of the new Government's NPPF, which proposes buffers would be reintroduced into the rolling calculation of 5YHLS. Moreover, some 1,725 / 1,975 homes are expected to come forward as windfall, in addition to new allocations. There must necessarily be some potential for uncertainty, overestimation of capacity, and delay, as not all sites come forward as expected. Likewise, the identified supply relies on 6,780 homes already benefiting from planning permission, and it is undoubtedly unrealistic to assume that there will be no lapses within this provision. A buffer should be

	<p>introduced to ensure that the Plan is properly justified, positively prepared, and effective, if a 5% buffer were added this would require the further allocation of 678 homes.</p> <p>The strategy remains focussed on sites that have not yet been built out but that benefit from planning permission, in addition to sites which, despite being allocated in LPP1 or LPP2, have still not come forward for development. This reemphasises the necessity of a buffer but also highlights a conflict with NPPF paragraph 126 which indicates that when there is no realistic prospect of an allocated site coming forward for its allocated use, it should be reallocated for alternative use or deallocated. Overall, 1,055 homes identified within the draft Local Plan as a source of supply were previously allocated in LPP2. Likewise, North Whiteley, Barton Farm and West of Waterlooville were allocated in LPP1 and are expected to provide some 6,700 homes in the new Local Plan-period, yet only around 2,800 homes have been delivered. This again highlights the need for a buffer and additional allocations to improve the consistency of housing supply going forward.</p> <p>The Plan includes a windfall supply of 1,875 homes. Whilst it is permissible to include an allowance for windfall, NPPF paragraph 72 sets out a test requiring ‘compelling evidence’ to justify the level of any contribution identified. The Council has not provided compelling evidence. The Windfall Assessment Report (2021) identifies a supply of 115 dpa over a 15-year period (2023/24 to 2037/38) but it is unclear why the Draft Local Plan should identify a higher annualised figure than this report suggests. In any case, the Windfall Assessment overstates what level of completion might reasonably be expected to come forward as a windfall. As a separate and additional point, the Plan in Table H3 identifies (as a source of supply) contributions from schemes of 10 dwellings or less which already benefit from planning permission but it is unclear if a lapse rate has been applied. The proposed approach to windfall supply is not appropriate or sufficient to satisfy the test set out in NPPF paragraph 72.</p> <p>A detailed housing trajectory for the Plan is absent from the evidence base so there is no clear position on overall capacity and prospective completion rates and no way to assess whether there is sufficient supply to address the proposed housing requirement or test this matter at Examination.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Catesby questions whether it is possible to render Policy H1 sound, given the identified concerns. However, in summary, the following modifications would be necessary:</p> <ul style="list-style-type: none"> <li>• Amend the Plan-period so that it commences in 2024, consistent with the 2024 SHMA, as the most recent evidence base assessment of housing needs.</li> <li>• Increase the overall housing requirement to address affordable housing needs more fully and in anticipation of the far higher assessment of housing needs expected to arise under the new Standard Method.</li> <li>• Increase the overall housing requirement to account for a more significant share of the unmet needs arising in nearby Local Authorities and the PfSH area.</li> </ul>

	<ul style="list-style-type: none"> <li>• Include at least a 5% buffer within the housing requirement and allocate additional sites to address this.</li> <li>• Review the identified windfall supply to satisfy the compelling evidence test.</li> <li>• Prepare a detailed housing trajectory, to address all sources of supply, and include this within the evidence base.</li> </ul> <p>In addition, if the Council intends to proceed to Examination (under Regulation 22) with the Draft Plan in its current form, a modification must be included to trigger an immediate review of the Plan following adoption. This must include clear timelines and milestones, and stringent penalties must be introduced if the Council fails to progress to an appropriate plan.</p> <p>It is Catesby's view the Bedford Local Plan 2030 provides a good example of a review mechanism 'with teeth', that proved effective in pushing the Council towards the immediate review that was required in that example. This states;</p> <p>"The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019".</p> <p>A review mechanism less forceful than that applied to Bedford risks being ignored. This is indeed apparent from the example in nearby Eastleigh Borough Council, where the Review of the Local Plan 2016-2036 is progressing far more slowly than the Examining Inspector envisaged in their Final Report.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The issues raised go to the heart of the Plan and its soundness and cannot be resolved by simply including amended wording. Instead, the Plan's strategic approach to identifying and addressing the housing requirement with suitable supply should be reconsidered. This is essential for the Plan to be consistent with national planning policies, positively prepared, justified and effective to ensure it is sound and justified.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a>  <a href="#">Supporting document 2 (Vision Framework)</a>  <a href="#">Supporting document 3 (Concept Plan)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 4 \(Integrated Impact Assessment comments\)](#)

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	St Philips Strategic Land
<b>Personal reference number</b>	ANON-AQTS-329U-C
<b>Full reference number</b>	ANON-AQTS-329U-C/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Policy SP2 is heavily interlinked with Strategic Policy H1, overall, it is considered that Policies SP2 and H1 do not positively plan for the significant affordability pressures within Winchester District, nor effectively plan to accommodate the needs for neighbouring authorities in the South Hampshire Urban Area, and are accordingly unsound.</p> <p>It is accepted that, at this stage, the Consultation Plan is to be considered against the requirements of the current Framework and associated Standard Methodology for calculating the minimum housing need for the District. Nevertheless, the proposed changes to the Framework result in a significant uplift in housing need from 676 dwellings per annum (dpa) to 1,099 dpa, and would result in the Council needing to commence an immediate Local Plan review. The Standard Methodology identifies a minimum annual housing need figure as a starting point for determining the level of need for the area.</p> <p>Housing affordability is a significant issue within the District, the latest median housing affordability ratio for the district is at 13.19 and is in the top 5% of the least affordable districts to live in (outside London and the Isles of Scilly). Despite the significant affordability issues, the HTP recommends that the Standard Method figure should not be increased to provide additional affordable housing. Whilst the standard methodology does include an affordability adjustment, the PPG is clear that the affordability adjustment applied in the standard methodology formula is not a solution to problems of affordability. The Council's Authority Monitoring Reports demonstrate that the Council has been unsuccessful in meeting their 40% affordable housing target as specified in Policy CP2 of the current Local Plan. Overall, whilst the standard methodology will start to address issues of affordability, it will not properly address the long-standing affordability issues in the district. Accordingly, the Council's proposed strategy to address matters of affordability is not positively prepared and fails to take into account reasonable alternatives in providing for a greater level of housing in the District.</p>

Policies SP2 and H1 include some 1,900 dwellings within the total housing requirement to contribute towards the unmet needs of neighbouring authorities within the PfSH area but the unmet needs of the PfSH area are substantially higher. The Spatial Position Statement between the PfSH authorities (dated December 2023) is clear that there is a substantial housing shortfall within the partnership area, amounting to nearly 12,000 dwellings over the period 2022-2036. Winchester, together with Test Valley, is identified as an area most able to accommodate additional housing growth to address unmet needs from the PfSH, and we note that the provision made in the Consultation Plan for unmet needs from the PfSH area has been increased from that in the Regulation 18 Plan (an increase of approximately 450 dwellings). However, it is unclear how this increased 1,900 dwelling figure has been reached, and whether it could and should be higher. The SHELAA demonstrates that there are a significant number of additional developable and deliverable sites which have not been taken forward for development. In Otterbourne, for example, 297 dwellings could be developed based on paragraph 6.39 of the Development Strategy and Site Selection Topic Paper. Whilst this level of development may not be considered to be sustainable in this location, it is unclear how the limitation of development in Otterbourne to just 55 dwellings has been reached. Overall, the provision of 1,900 dwellings towards the unmet needs of neighbouring authorities is unjustified.

The spatial strategy for the provision of housing is set out Strategic Policy SP2 of the Consultation Plan. We do not dispute this approach, but the way this spatial strategy has then been translated into specified housing provision targets for different areas / settlements is unclear, specifically with regards to the provisions within the Market Towns and Rural Areas spatial area, and within that the Intermediate Rural Settlements.

Table H2 to Policy H1 confirms that 3,170 dwellings have been completed since 2020, some 21% of the total supply of the Consultation Plan. It is questioned as to the appropriateness of the Consultation Plan period commencing in 2020. The intent of the Standard Method for calculating housing need is to look forward whilst capturing and accounting for past housing delivery. The PPG is clear that the current year is used as the starting point for calculating housing need and that the affordability ratio for the current year should be applied. The affordability ratio is adjusted annually to reflect house prices and market signals, which are influenced by past housing completions delivered to the market – completions (and any theoretical ‘over supply’) have, therefore, already been accounted for in the affordability adjustment. As such, the start date of the Consultation Plan should be that of the standard method calculation, the current year. For Winchester, this would result in a standard method housing need over the period to 2040 of some 10,816 dwellings plus a further 1,900 provision towards unmet needs – a total of 12,716 dwellings. The housing provision in Table H2 would amount to 12,295 dwellings (not including completions 2020-2023), and thus there would be a shortfall even on the Council’s case relevant to the housing requirement. Additionally, should the Consultation Plan not be adopted until 2026, which is not unrealistic given the remaining process to be followed up to adoption, then the Plan period would be required to be extended to 2041 in order that the required minimum 15 year

	<p>from period from adoption is covered. This would necessitate an additional year of housing land supply being identified.</p> <p>It is clear from the above that the Consultation Plan:</p> <ul style="list-style-type: none"> <li>• Does not accord with national planning policy, with the start of the Plan period not being the 'current year', the basis for calculation of housing need and, as a result, fails to address the full housing needs of the district.</li> <li>• Relies on the Standard Method for identifying local housing need as a maximum target rather than the minimum starting point position, as set out in national policy.</li> <li>• Fails to provide an additional affordability uplift beyond the Standard Method in order to address the significant and worsening affordability of housing within Winchester district.</li> <li>• Inadequately provides for unmet housing needs in the wider PfSH area and, therefore, the fails in its Duty to Cooperate.</li> </ul> <p>It is therefore considered that the Consultation Plan fails to meet the test of soundness set out in the NPPF.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H3, and by implication Policies SP2 and H1, cannot therefore be considered to accord with national policy and should be amended accordingly, with the identification of additional housing provision being necessary.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Letter (commenting on policies and evidence base - includes vision document)</a></p>

*such as images, tables, or  
tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	West Waterlooville Developments Limited (Grainger PLC)
<b>Personal reference number</b>	ANON-AQTS-3B5G-A
<b>Full reference number</b>	ANON-AQTS-3B5G-A/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Comments in relation to the duty to co-operate have been made in relation to policy SP2. West Waterlooville Developments Limited (WWDL) fully supports the three spatial areas for housing development identified in Policy H1 (Housing Provision) and the settlement hierarchy outlined under Policy H3.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Supporting Document (Site Delivery Statement - Berewood)</a>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/11/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>It should be made clear in Policy H1 that the housing figures minimum targets and a starting point. The NPPG is clear that the standard methodology set out provides a “minimum” figure of housing need. This particularly applies in respect of the need to contribute to meeting the Partnership for South Hampshire strategy. Policy H1 is unsound on the basis that it fails to plan positively to fully meet the evidenced scale of local housing need – in particular the unmet needs arising in South Hampshire. The duty to co-operate is a legal duty on local planning authorities. In a Written Ministerial Statement dated 30 July 2024, the new Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government confirmed the continued operation of the duty to cooperate. As per paragraphs 11b) and 27 of the current version of the NPPF, December 2023, strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through statements of common ground). In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. Assuming the forthcoming introduction of the new standard method these already high levels of unmet need are to set to increase substantially.</p> <p>Examining the Local Plan housing trajectory, it becomes evident that the overall trend for housing provision in the Winchester district is downward. 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. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed it is crucial to include additional allocations in this plan that would support and sustain higher levels of housing completions. The current housing requirement has decreased from the Regulation 18 stage, where</p>

the minimum requirement was set at 736 dwellings annually, totalling 14,178. Previously a buffer for standard method changes and to help contribute to the PfSH shortfall had been allowed for in the total housing need figure, there is no longer any reference to the former. Given that the standard method serves as a starting point and the proposed housing requirement for Winchester under the proposed standard method (consultation now closed) is 1,099, the proposed decrease since Regulation 18 to 13,565 does not provide a sound or robust foundation for the local plan.

While the PfSH position statement predates the updated NPPF consultation and the new standard method, there is a clear expectation for flexibility in the preferred spatial approach, which can be adjusted to accommodate the outcome of the Government consultation. In this regard, the proposed standard method local housing needs, would give rises to significant increase in housing required for adjacent PfSH authorities. There is a lack of evidence regarding how the unmet need figure was calculated but the current allowance falls significantly short of what is necessary to support a sound local plan. The plan should proactively seek to address the unmet housing needs by establishing a higher housing target, which reflects the positive opportunities and capacity within the district. It should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. This should include expanding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) to include site WI06, increasing the total number of units from 40 to around 100. This proposed expansion is justified, considering the district's capacity to address the (growing) unmet needs within the Partnership for South Hampshire (PfSH) area as part of its duty to cooperate, while also allowing greater flexibility in the event of any non-delivery on existing allocated sites. This approach would ensure that the policy is positively prepared and remains effective over its period. The PfSH Spatial Position Statement (December 2023) shows there is a shortfall of just under 11,800 homes across the South Hampshire sub region which is likely to increase between 35,000 to 40,000 should the proposed amendments to the NPPF and Standard Method be adopted.

Bloor Homes contests the Council's decision to establish a plan period beginning in 2020, which precedes the submission of the local plan for examination by over four years. The Council's approach fundamentally misinterprets the standard method, which incorporates past supply via an affordability uplift to determine future housing needs. The increase in housing delivery, to a degree, takes into account past over supply in that it will have increased supply in the market, thereby potentially limiting increases in housing prices in Winchester and lessening the assessed housing need determined under the standard method. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. Commencing the plan period in 2020 is neither logical nor consistent with national policy; it should instead begin in 2024, the year in which the assessment was calculated and also to allow for delays to adoption.

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>It should be made clear in Policy H1 that these are minimum targets and should only be seen as a starting point. To ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording.</p> <p>To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - it is crucial to include additional allocations in this plan that would support and sustain higher levels of housing completions. The plan should proactively seek to address the unmet housing needs by establishing a higher housing target, which reflects the positive opportunities and capacity within the district. Furthermore, it should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. This should include expanding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) to include site WI06, increasing the total number of units from 40 to around 100.</p> <p>The council's intention to maintain a 20-year plan period cannot justify starting the plan in 2020. To ensure consistency with national policy, the Council should revise the plan period to start in 2024.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>It should be made clear in Policy H1 that these are minimum targets.</p> <p>Include a higher housing target and allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. This should include expanding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) to include site WI06, increasing the total number of units from 40 to around 100.</p> <p>Revise the plan period to start in 2024.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	McCarthy Stone & Churchill Living
<b>Personal reference number</b>	ANON-AQTS-3274-9
<b>Full reference number</b>	ANON-AQTS-3274-9/3/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	To be consistent with national policy and for the plan to be justified and effective, the plan should also identify the specific housing needs of specific groups, as identified by the Council's SHMA.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	The following sentence should be added to Policy H1.  1,346 of these dwellings should be provided to meet the housing needs of older people (9% of the total housing requirement)
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/5/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Bargate Homes supports the use of the SM LHN and the acceptance that some of the unmet need can be accommodated within Winchester district. However, provision should be far greater. Given the NPPF provisions around boosting housing land supply, the housing requirement must be stated as a minimum.</p> <p>It is entirely unacceptable to set the plan period at 2020 for the sole purpose of securing ‘over-supply’ from the last four years. There is no support for this approach in the NPPF, PPG or in the standard methodology; over-supply across previous years does not exist in setting the housing requirement looking forward from 2023. The PPG sets out the standard methodology and makes no provision to manipulate a forward looking SM LHN requirement such that is it offset by delivery in past years. The plan must positively address the ongoing affordability challenge, which is, to some extent, reflected in the standard methodology affordability ratio at 1st April 2024, i.e. taking into account past performance. The plan period should be re-set at 1 April 2024 and the housing requirement and provision set from that time</p> <p>The SHMA (July 2024) highlights that the district’s median monthly rental values as of September 2023 are higher across all types of housing when compared to all other geographies assessed, and critically the median house price was significantly greater in Winchester than for wider comparator geographies. This is a clear demonstration that the local plan needs to be planning for a higher housing need figure, not a manipulated lower one, at a level above the current standard method. The constrained housing market exacerbates the affordability challenge within the district. The estimated need for Social/Affordable Rented Housing (per annum), according to the SHMA will increase significantly from a current need of 55, to a net annual need of 368, which is principally the result of 419 newly forming households across the plan area. However, and given that the viability assessment sets a general affordable requirement of 40%, it is clear that the housing provision is not going to address affordability in the district, and an uplift would be fully justified. Over a 16 year period 2024 - 2040, at least 5,888 affordable homes are needed (368*16), with circa 65% of</p>



the total proposed housing land supply from all other sources needs to be secured as affordable. This is unachievable. To meet the SHMA estimate, WDC's supply of larger viable sites would need to be in the region of 16,000 homes (a total supply of more than 18,000 homes across the period 2024 – 2040).

Whilst the PfSH SPS predates the revised NPPF consultation and proposed new standard method, there is a clear expectation of flexibility in the preferred spatial approach, which can be adjusted to accommodate future Government consultation. In this context, the proposed standard method local housing need (and associated percentage uplift) over the current standard method figure for the following adjacent PfSH authorities is noted:

- East Hampshire: 575 to 1,074 (87% increase)
- Havant: 508 to 874 (72% increase)
- Portsmouth City Council: 897 to 1,098 (22% increase)
- Fareham: 498 to 794 (59% increase)
- Eastleigh: 645 to 902 (40% increase)
- Test Valley: 525 to 921 (75% increase)

Overall the unmet need across the full PfSH authorities, under the revised SM LHN figures, has increased from circa 12,000 homes to at least 35,000 homes. This is across a 13 year period 2023 – 2036. An unmet needs allowance for neighbouring authorities of 1,900 is disproportionate to the scale and location of the need, particularly noting the requests from both Havant and Portsmouth under the DtC (totalling 7,886 homes: 4,377 from Portsmouth, less 800 provided for in the Fareham plan, and 4,309 from Havant). It has not clear, or evidenced, how this figure of 1,900 homes has been calculated. The 'allowance' is not ring fenced and could be used to meet additional needs of Winchester District, and has not been identified through the proper and robust process of testing the alternatives, by considering the full scale of the unmet need and the alternatives available to meet that need. The 1,900 figure is a fall-out from the removal of any flexibility buffer which would have helped Winchester in its meeting its own future needs given the increasingly acute affordability challenge that it was facing and recognised (by anticipating an increase in its SM LHN). The evidence is that far more could and should be done in Winchester to meet the DtC and find the plan sound. Whilst Winchester takes the position that this can all be addressed through a local plan review, this work would 'take several years', but the housing need is now. Consequently, the plan should maximise opportunities to meet the unmet need, though additional site allocations in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options.

Currently, 12% of delivery is allowed for from windfall sites. Whilst windfall sites have a role to play, a more robust way to ensure the key priority of affordability is maintained would be to rely less on potential windfall sites, and more on site allocations. More allocations would give greater reliability and certainty for housing

	<p>delivery, especially for affordable homes (alongside wider public benefits), which may not be required or achievable on smaller windfall sites. The plan is overly reliant on large brownfield sites which have a longer lead-in time, and are typically more complicated and therefore expensive to develop. This is reflected in the reliance on the proposed allocation at Sir John Moore Barracks, which assumes delivery of 900 homes and is considered overly optimistic. Further greenfield sites will be required to meet Winchester's needs going forward, the opportunity at Salters Lane is well placed to support this additional need requirement.</p> <p>The Housing Topic Paper identifies a five year housing land supply (HLS) of 3,849 homes at 1st April 2024, set against a requirement of 2,536 homes (said to include a 5% buffer), resulting in a HLS position of 7.6 years. The HLS must be demonstrable on adoption of the plan. The supply and trajectory will need to be updated during the examination period, to rebase at 1st April 2025. In the meantime, we have concerns with the approach taken resulting at the present time in 3.73 years (HLS position). Clearly, there is an issue with the trajectory which must be addressed through the allocation and release of additional deliverable sites.</p> <p>In progressing the plan as currently drafted, it will in all likelihood fall under the category of a deficient plan at examination stage, which does not reflect the NPPF updates, most notably the significantly increased housing target for the district. Overall, the approach taken by the council does not align with the government's stated goal to achieve universal coverage of ambitious local plans as quickly as possible, and will constrain the council's ability to deliver on the required number of homes, including affordable provision. There is a real risk that the plan will be found unsound, only causing delay in the progress towards a sound plan and significantly increasing the risk that the council will fall into a housing land supply shortfall, once the Standard Method Local Housing Need comes into play.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The policy should be amended to increase the housing requirement, and associated housing provision, responding positively to the relevant plan period objectively assessed housing need (SM LHN for Winchester plus a specific and enhanced proportion of the unmet need from the PfSH area), and affordability challenge, and allowing for a greater housing distribution across the district to account for the future housing trajectory trend.</p> <p>This needs to be achieved through additional new allocations, reflecting the draft plan's overreliance on existing permissions and allocations. At the very minimum additional provision should be made for 1,385 homes, reflecting the base-date position on SM LHN and necessary related provision.</p> <p>Further, the Council should look again at sustainable opportunities to create flexibility for its own likely increase in the SM LHN and in response to both affordability and the scale of the unmet need.</p> <p>Also, there is a need to identify additional land which can provide for a deliverable supply, counting towards a satisfactory five-year HLS position.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>“Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2024 - 2040), including a contribution towards the unmet needs of adjoining areas. The housing requirement across the plan period is a minimum of 16,540 dwellings (to be uplifted further on reassessment of the SHLAA opportunities and IIA). Provision is made to meet this requirement in this period (excluding the South Downs National Park area), by utilising suitable previously developed land within defined settlement boundaries, completion of strategic allocations at Kings Barton (North Winchester), Newlands (West of Waterlooville) and North Whiteley, and delivery of sites allocated within and adjoining the most sustainable settlements, in accordance with the Local Plan’s spatial strategy (set out in Policy SP2). Housing development will be distributed between the three spatial areas as follows:</p> <ul style="list-style-type: none"> <li>i. Winchester Town about 5,640 dwellings (needs to be increased to address SM LHN / affordability)</li> <li>ii. South Hampshire Urban Areas about 5,650 dwellings (needs to be increased to address PfSH)</li> <li>iii. Market Towns and Rural Area about 3,825 dwellings. (needs to be increased to address PfSH)”</li> </ul>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Mark, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/4/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H1 : Housing Provision The Plan covers the period to 2040 and contains proposed allocations to meet housing requirements over the plan period. These include both new allocations and allocations carried forward from the adopted Plan. It includes the current Standard Method (SM) requirement of 676 dpa as a starting point and my client acknowledges this is consistent with current NPPF guidance. Taking into account the SM for the early years of the plan, this equates to 13,565 dwellings for the district over the Local Plan period 7 to 2040. As highlighted above, this compares with a requirement set out the proposed revised SM for Winchester of 1,099 dpa, set out within the NPPF consultation. However, paragraph 35 (c) of the NPPF confirms that in order for a Plan to be considered sound it must be positively prepared, and as a minimum, should meet the area’s objectively assessed needs, as well as unmet need from neighbouring areas where it is practical to do so and is consistent with achieving sustainable development. The Plan acknowledges at paragraph 9.16-9.18 that within Southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full. The Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement (SPS) published in December 2023 to address this. This SPS recognises that in the short to medium term several authorities, including Winchester, should potentially be able to exceed their Standard Method based housing needs (para 3.33). Accordingly, WCC provide an uplift to the housing requirement of 1,900 dwellings to help contribute towards the PfSH shortfall. Taking into account the unmet need uplift, this equates to total provision of 15,465 dwellings over the plan period, or 773 dpa. This does include 350 dwellings within the South Downs National Park part of the administrative area over the plan period. The SPS is referred to specially within the Duty to Cooperate (DoCS) Statement (September 2024) published by WCC. However, neither the SPS nor the DoCS Statement provide any justification for the provision of 1,900 dwellings to meet unmet needs. Table 1 of the SPS identifies total unmet needs across PfSH of over 11,000 dwellings. This is a significant shortfall and whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs than is currently being proposed. Further evidence needs to be provided to justify why a figure of only 1,900 dwellings has been put forward. In the absence of this, it is difficult to determine whether this is reasonable in the context of the Reg 19 Plan being ‘positively prepared’. In addition to the above, there is no</p>

	specific increase to account for any affordability as this is argued is already considered within the Standard Method. It is worth emphasising that the need for affordable / social rented housing in WCC has increased to about 368 dwellings per annum Winchester (Strategic Housing Market Assessment Update 2024).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TT-6
<b>Full reference number</b>	ANON-AQTS-32TT-6/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The housing requirement set out by Policy H1 should be a minimum figure. The Local Plan period should also be extended by at least 4 years as the current base date for the Plan is 2020, it will be five years old already when it reaches Examination. The Council states this is to take account of past higher delivery rates but this will mean that there will be less than 15 years of the Plan left at adoption date and it therefore doesn't Plan far enough forward to ensure that housing needs will be met in a sustainable way.</p> <p>Winchester District Council, in conjunction with nearby authorities, have jointly identified an unmet need for 11,771 homes between 2023 and 2036 across the area covered by the Partnership for South Hampshire (PfSH) which includes the southern part of Winchester District. The authorities propose to address this need through a two stage approach. Havant Borough Council and Portsmouth City Council have both formally requested assistance from Winchester City Council with meeting expected shortfalls of about 4,300 and 3,577 dwellings respectively, a total of 7,877 dwellings. Winchester District has larger areas of unconstrained land than nearby authorities. It is capable of accommodating more than the 1,900 dwellings proposed towards unmet need, with the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 states that there is a theoretical residential capacity of SHELAA sites totalling 62,359 dwellings. The opportunities that these sites present should be fully explored, land at Springvale Road, Kings Worthy (ref. KW05), is free from any significant constraints and should be allocated for residential development to help meet housing needs.</p> <p>The housing supply should provide for sufficient contingency to accommodate the inevitable non-delivery and delays that will affect some sites. Many LPAs and Inspectors have concluded that the housing requirement should include such a 'buffer' above the full housing need in order to ensure that housing needs will be addressed. The 'buffer' to be applied in any one LPA will be largely determined by the reliability of the supply but is normally at least 5% if not 10%. The draft Local Plan provides no such 'buffer' and is therefore entirely</p>

	<p>reliant upon 100% of the supply delivering within the plan period. This is entirely unrealistic, particularly given that the Plan relies upon the delivery of a number of large brownfield sites, including Sir John Moore Barracks (WC2) 900 dwellings, where delivery timescales, capacity and availability of the site are still uncertain, and Central Winchester Regeneration Area (WC7) 300 dwellings. Previously developed land often takes longer to deliver, particularly large sites such as these, and is likely to deliver reduced/no affordable housing given existing land values and higher development costs. The application of a conservative 5% buffer above the need for at least 13,565 (excluding unmet needs) would result in a minimum housing requirement of 14,243 dwellings (excluding unmet needs). An appropriate unmet need figure will need to be added and should be increased given the relatively unconstrained nature of the District and the theoretical capacity identified within the SHELAA. The overall housing provision should be increased following a robust assessment of capacity to respond to a pressing need for open market and affordable housing and student accommodation within the District.</p> <p>There is no detailed housing trajectory included in the Local Plan. It is not clear what sites are expected to be delivered and when and without this is it not clear what sites the Council are relying on to maintain a housing land supply.</p> <p>Given that the Council’s annual housing requirement is likely to be more than 200 dwellings below the relevant published Local Housing Needs figure, the draft NPPF (July 2024) sets out a requirement to commence plan making in the new plan making system at the “earliest opportunity”. A commitment to the commencement of the preparation of a new Plan under the new plan-making system at the earliest opportunity should therefore be included within the Draft Local Plan and a policy should be included to that effect.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H1 should be amended to make it clear the housing requirement is a minimum and to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.</p> <p>Land at Springvale Road, Kings Worthy (KW05), should be allocated for residential development to help meet some of this requirement.</p> <p>The Council should also include a more detailed housing trajectory in the Plan.</p> <p>A new policy should be included to set out the Council’s commitment to a commencing the preparation of a new Plan under the new plan-making system at the earliest opportunity. We would welcome the opportunity to discuss appropriate timescales for the preparation of the new Plan at the Examination hearing sessions.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H1 should be amended to make it clear the housing requirement is a minimum and to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.</p>

	<p>Land at Springvale Road, Kings Worthy (KW05), should be allocated for residential development to help meet some of this requirement.</p> <p>The Council should also include a more detailed housing trajectory in the Plan.</p> <p>A new policy should be included to set out the Council's commitment to commencing the preparation of a new Plan under the new plan-making system at the earliest opportunity. We would welcome the opportunity to discuss appropriate timescales for the preparation of the new Plan at the Examination hearing sessions.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Supporting information (Illustrative concept masterplan)</a></p> <p><a href="#">Supporting information (Copy of letter re: Land at Springvale Road, Kings Worthy)</a></p>



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bewley Homes
<b>Personal reference number</b>	ANON-AQTS-32T9-B
<b>Full reference number</b>	ANON-AQTS-32T9-B/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Local Plan underestimates the scale of housing need, particularly in light of the significant unmet needs from neighbouring authorities such as Portsmouth and Havant. The current buffer of 1,450 homes is insufficient given the scale of these shortfalls. Additionally, with 1,544 households on the housing register and a house price-to-income ratio of 13.19, there is an acute need for affordable housing in Winchester. The Plan's 40% affordable housing target is inadequate and unlikely to be met without a stronger, more flexible housing strategy. The Local Plan does not adequately address the Duty to Cooperate, particularly in relation to unmet housing needs from neighbouring areas. A more collaborative and responsive approach is required to meet Winchester's legal obligations under national policy.</p> <p>Please see attached representation documents (Iceni projects reps 241011 Denmead Reps reg 19) FULL REP: HOUSING REQUIREMENT – POLICY H1</p> <p>We consider a buffer for slippage non-implementation is required due to the proposed make-up of the supply of sites within the District. The Local Plan includes a number of sizeable allocations, amounting to around half of the total supply within the District coming from just 4 sites. At West of Waterlooville, the required delivery rate is 92 dwellings per annum over the remaining plan period to deliver the allocation requirement. This is in line with the most recent year of monitoring delivery (2020/21), which was during buoyant market conditions. Given the current instability in the housing market and the potential for a long period of recession, we do not consider that relying on previous rates of delivery is appropriate. It is similar story at North Whiteley where a delivery rate of 205 units is required in line with the most recent year of recorded delivery (2020/21). For this larger site, which is responsible for one quarter of the total level of supply, the margin for error is much tighter, even smaller deviations from this delivery rate would be very significant impact on the Council's ability to deliver on its housing target. While work has already started on two of these sites, the Barracks site is not due for</p>

	<p>decommissioning until 2026. Even in the most optimistic scenarios, the first units are unlikely to be delivered before 2027, which assumes the Ministry of Defence sticks to this date with no slippage. While no trajectory for delivery is provided in the Local Plan, with only 12 years to run until the end of the Local Plan, this would require a deliver rate of over 80 dwellings per annum. This is ambitious for a scheme of this size, where only one developer is likely to be bringing forward the units. We would suggest a figure of 50 dwellings per annum is more appropriate against a start date of 2029. This would reduce the figure in the allocation to 500 units over the plan period</p> <p>Given the above, we consider that there is a very strong justification for building in supply side flexibility on top of the Council's housing target, this is standard practice. In addition, the Council should seek to allocate small sites which could support early delivery. We consider that along with the additional demand side flexibility amendments, proposed supply flexibility of a 10%-20% buffer is also justified and necessary to make the plan sound.</p> <p>The housing requirement will be insufficient to meet the affordable housing need of the District in full. The total affordable housing requirement of the SM is 56% of the overall housing provision. The Council's affordable housing target is 40% and as established in this document, this will not be achieved. As such, the Council will be fortunate if even half of the affordable housing need is met in the District. This will have a drastic impact on the already acute affordability issues in Winchester, as highlighted by the SHMA. The Housing Requirement is unsound because it fails to meet affordable housing need in full and does not provide sufficient flexibility for supply-side issues that could mean the Council undershoots its SM figure.</p> <p>The Local Plan is not positively prepared or effective. To remedy this the Council should increase the housing requirement by at least 10% to cover the supply-side issues and a further 10% to bring it closer to meeting affordable housing need. The very limited level of supply in the later stages of the plan could be supplemented here.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>To make the Local Plan sound, we recommend the following actions:</p> <ul style="list-style-type: none"> <li>• Increase the housing requirement: To more accurately reflect local and regional housing needs, particularly those of neighbouring authorities.</li> <li>• Allocate smaller, deliverable sites: Sites like Forest Road and Furzeley Road should be allocated to provide a more flexible and resilient housing strategy.</li> <li>• Strengthen the response to unmet need: Ensure Winchester contributes more meaningfully to the unmet housing needs in neighbouring authorities, improving cooperation and ensuring legal compliance.</li> </ul> <p>Please see attached representation documents (Iceni projects reps 241011 Denmead Reps reg 19) FULL REP ON H1: HOUSING REQUIREMENT – POLICY H1</p>

<b>What is your suggested wording or text for the policy?</b>	FULL REP HOUSING REQUIREMENT – POLICY H1 We do not consider that the Council’s housing requirement set out Policy H1 (Housing Provision) is sound. We consider a buffer for slippage non-implementation is required due to the proposed make-up of the supply of sites within the District.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting document 1 (Landscape Statement - Land at Forest Road/Furzeley Road, Denmead)</a> <a href="#">Supporting document 2 (Site layout - Land at Forest Road/Furzeley Road, Denmead)</a> <a href="#">Supporting document 3 (Preliminary Ecological Appraisal)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/5/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] SECTION 3.</p> <p>WCC has included an unmet needs allowance of 1,900 dwellings on top of the standard methodology figure to cater for neighbouring authorities. Bloor supports this approach of the consideration of the standard methodology as the minimum and the inclusion of an unmet need allowance, but consider that WCC should plan beyond the minimum position.</p> <p>Paragraph 9.6 sets out a development strategy based on a sustainable settlement hierarchy (informed by the Settlement Hierarchy Review). Bloor supports this approach, however, raises questions of how much weight was given to the hierarchy when site selecting and with the actual scoring within the settlement hierarchy, as such it is not considered that the R19 LP allocates development in the most sustainable locations.</p> <p>The WCC draft R19 LP is only planning for 2,875 dwellings in newly identified allocations, just 19% of their total need, with 69% coming from existing or completed permissions and commitments and 12% from windfall development, across their plan period at the height of the housing crisis, in an area with an affordability ratio of 13.19 (and rising house prices), which is well above the Hampshire 10.14, the south west 9.27 and England 8.26 average ratios. Without including more strategic allocations, WCC will be unlikely to be able to demonstrate a 5YHLS from the period of April 2025 to March 2030, as evidenced by the technical work by Intelligent Land appended to this representation (see Appendix 2). Bloor do not consider that this is positive planning in accordance with the NPPF and PPG.</p> <p>Bloor do not consider that the R19 LP as drafted would deliver sufficient affordable housing under the mechanisms of Policy H6. Further, it is considered unrealistic to expect developers to provide in excess of</p>

	<p>40% affordable housing alongside cumulative costs of all other development and mitigation/infrastructure. Therefore the only method to ensure that the WCC Local Plan delivers affordable housing in line with their local need is to increase the total district housing provision in line with the draft NPPF standard methodology requirement. WCC's argument against this set out in their Housing Topic Paper is to counter this position by stating that the SM "bakes" in affordable housing through the affordability uplift. In an area so chronically short of affordable housing (which is referenced throughout the Local Plan) and rising house prices this is not sound especially given only the minimum figure has been included in the housing requirement.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] SECTION 3.</p> <p>WCC should plan beyond the minimum position and the standard methodology approach set out in the draft NPPF should be utilised and a higher unmet need provision provided.</p> <p>Without including more strategic allocations, WCC will be unlikely to be able to demonstrate a 5YHLS from the period of April 2025 to March 2030. The total district housing provision should be increased in line with the draft NPPF standard methodology requirement..</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] SECTION 3.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TA-K
<b>Full reference number</b>	ANON-AQTS-32TA-K/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The housing requirement set out by Policy H1 should be a minimum figure. The Local Plan period should also be extended by at least 4 years as the current base date for the Plan is 2020, it will be five years old already when it reaches Examination. The Council states this is to take account of past higher delivery rates but this will mean that there will be less than 15 years of the Plan left at adoption date and it therefore doesn't Plan far enough forward to ensure that housing needs will be met in a sustainable way.</p> <p>Winchester District Council, in conjunction with nearby authorities, have jointly identified an unmet need for 11,771 homes between 2023 and 2036 across the area covered by the Partnership for South Hampshire (PfSH) which includes the southern part of Winchester District. The authorities propose to address this need through a two stage approach. Havant Borough Council and Portsmouth City Council have both formally requested assistance from Winchester City Council with meeting expected shortfalls of about 4,300 and 3,577 dwellings respectively, a total of 7,877 dwellings. Winchester District has larger areas of unconstrained land than nearby authorities. It is capable of accommodating more than the 1,900 dwellings proposed towards unmet need, with the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 states that there is a theoretical residential capacity of SHELAA sites totalling 62,359 dwellings. The opportunities that these sites present should be fully explored, land at Field Farm, Swanmore, is free from any significant constraints and should be allocated for residential development to help meet housing needs.</p> <p>The housing supply should provide for sufficient contingency to accommodate the inevitable non-delivery and delays that will affect some sites. Many LPAs and Inspectors have concluded that the housing requirement should include such a 'buffer' above the full housing need in order to ensure that housing needs will be addressed. The 'buffer' to be applied in any one LPA will be largely determined by the reliability of the supply but is normally at least 5% if not 10%. The draft Local Plan provides no such 'buffer' and is therefore entirely reliant upon 100% of the supply delivering within the plan period. This is entirely unrealistic, particularly given</p>

	<p>that the Plan relies upon the delivery of a number of large brownfield sites, including Sir John Moore Barracks (WC2) 900 dwellings, where delivery timescales, capacity and availability of the site are still uncertain, and Central Winchester Regeneration Area (WC7) 300 dwellings. Previously developed land often takes longer to deliver, particularly large sites such as these, and is likely to deliver reduced/no affordable housing given existing land values and higher development costs. The application of a conservative 5% buffer above the need for at least 13,565 (excluding unmet needs) would result in a minimum housing requirement of 14,243 dwellings (excluding unmet needs). An appropriate unmet need figure will need to be added and should be increased given the relatively unconstrained nature of the District and the theoretical capacity identified within the SHELAA. The overall housing provision should be increased following a robust assessment of capacity to respond to a pressing need for open market and affordable housing and student accommodation within the District.</p> <p>There is no detailed housing trajectory included in the Local Plan. It is not clear what sites are expected to be delivered and when and without this is it not clear what sites the Council are relying on to maintain a housing land supply.</p> <p>Given that the Council's annual housing requirement is likely to be more than 200 dwellings below the relevant published Local Housing Needs figure, the draft NPPF (July 2024) sets out a requirement to commence plan making in the new plan making system at the "earliest opportunity". A commitment to the commencement of the preparation of a new Plan under the new plan-making system at the earliest opportunity should therefore be included within the Draft Local Plan and a policy should be included to that effect.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H1 should be amended to make it clear the housing requirement is a minimum and to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.</p> <p>Land at Field Farm, Swanmore (SWA10), should be allocated for residential development to help meet some of this requirement.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H1 should be amended to make it clear the housing requirement is a minimum and to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.</p> <p>Land at Field Farm, Swanmore (SWA10), should be allocated for residential development to help meet some of this requirement.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Hathor Property
<b>Personal reference number</b>	ANON-AQTS-32T7-9
<b>Full reference number</b>	ANON-AQTS-32T7-9/4/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H1 : Housing Provision The Plan covers the period to 2040 and contains proposed allocations to meet housing requirements over the plan period. These include both new allocations and allocations carried forward from the adopted Plan. It includes the current Standard Method (SM) requirement of 676 dpa as a starting point and my client acknowledges this is consistent with current NPPF guidance. Taking into account the SM for the early years of the plan, this equates to 13,565 dwellings for the district over the Local Plan period to 2040. As highlighted above, this compares with a requirement set out the proposed revised SM for Winchester of 1,099 dpa, set out within the NPPF consultation. However, paragraph 35 (c) of the NPPF confirms that in order for a Plan to be considered sound it must be positively prepared, and as a minimum, should meet the area’s objectively assessed needs, as well as unmet need from neighbouring areas where it is practical to do so and is consistent with achieving sustainable development. The Plan acknowledges at paragraph 9.16-9.18 that within Southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full. The Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement (SPS) published in December 2023 to address this. 9 This SPS recognises that in the short to medium term several authorities, including Winchester, should potentially be able to exceed their Standard Method based housing needs (para 3.33). Accordingly, WCC provide an uplift to the housing requirement of 1,900 dwellings to help contribute towards the PfSH shortfall. Taking into account the unmet need uplift, this equates to total provision of 15,465 dwellings over the plan period, or 773 dpa. This does include 350 dwellings within the South Downs National Park part of the administrative area over the plan period. The SPS is referred to specially within the Duty to Cooperate (DoCS) Statement (September 2024) published by WCC. However, neither the SPS nor the DoCS Statement provide any justification for the provision of 1,900 dwellings to meet unmet needs. Table 1 of the SPS identifies total unmet needs across PfSH of over 11,000 dwellings. This is a significant shortfall and whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs than is currently being proposed. Further evidence needs to be provided to justify why a figure of only 1,900 dwellings has been put forward. In the absence of this, it is difficult to determine whether this is reasonable in the context of the Reg 19 Plan being ‘positively prepared’. In addition to the above, there is no</p>

	specific increase to account for any affordability as this is argued is already considered within the Standard Method. It is worth emphasising that the need for affordable / social rented housing in WCC has increased to about 368 dwellings per annum Winchester (Strategic Housing Market Assessment Update 2024).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3BPV-M
<b>Full reference number</b>	ANON-AQTS-3BPV-M/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Paragraph 61 of the NPPF requires that in addition to meeting local needs, any needs that cannot be met within neighbouring areas should be taken into account. Winchester District Council, in conjunction with nearby authorities, have jointly identified an unmet need for 11,771 homes between 2023 and 2036 across the area covered by the Partnership for South Hampshire (PfSH) which includes the southern part of Winchester District – see PfSH Spatial Position Statement 2023. The authorities propose to address this need through a two stage approach. Stage one: in the short to medium term five authorities (Winchester, East Hampshire, Eastleigh, Fareham and Test Valley) “should be able to meet and potentially exceed NPPF 2023 standard method-based housing needs in their respective local plan areas” (PfSH Spatial Position Statement 2023). The Statement goes on to set out that stage two is to identify Broad Areas of Search for Growth to contribute towards meeting ongoing unmet housing need in the longer term.</p> <p>Havant Borough Council and Portsmouth City Council have both formally requested assistance from Winchester City Council with meeting expected shortfalls of about 4,300 and 3,577 dwellings respectively, a total of 7,877 dwellings.</p> <p>Winchester District has larger areas of unconstrained land than nearby authorities. It is capable of accommodating more than the 1,900 dwellings proposed towards unmet need. The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2023 states that there is a theoretical residential capacity of SHELAA sites totalling 62,359 dwellings, therefore far in excess if the 1,900 currently proposed contribution towards unmet need. The opportunities that these sites present should be fully explored to inform the actual quantum of housing that the District can accommodate. This should include a proper review of existing Settlement Gaps (see our comments in relation to the Development Allocations section of the Plan in relation to concerns about how sites within the Gap have been assessed).</p> <p>Furthermore, the housing supply relied upon should provide for sufficient contingency to accommodate the inevitable non-delivery and delays that will affect some sites. Many LPAs and Inspectors have concluded that the housing requirement should include such a ‘buffer’ above the full housing need in order to ensure that housing needs will be addressed. The ‘buffer’ to be applied in any one LPA will be largely determined by the reliability of the supply but is normally at least 5% if not 10%.</p>

	<p>However, the draft Local Plan provides no such 'buffer' and is therefore entirely reliant upon 100% of the supply delivering within the plan period. This is entirely unrealistic, particularly given that the Plan relies upon the delivery of a number of large brownfield sites, including Sir John Moore Barracks (WC2) 900 dwellings and Central Winchester Regeneration Area (WC7) 300 dwellings. Previously developed land often takes longer to deliver, particularly large sites such as these, and is likely to deliver reduced/no affordable housing given existing land values and higher development costs. As such, it is entirely appropriate to include a buffer to allow for slow/reduced delivery.</p> <p>The application of a conservative 5% buffer above the need for at least 13,565 (excluding unmet needs) would result in a minimum housing requirement of 14,243 dwellings (excluding unmet needs). An appropriate unmet need figure will need to be added to this amount. As set out above, this should be increased given the relatively unconstrained nature of the District and the theoretical capacity identified within the SHELAA. The overall housing provision should be increased following a robust assessment of capacity to respond to a pressing need for open market and affordable housing and student accommodation within the District.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H1 should be amended to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H1 should be amended to increase the overall provision of housing, to be informed by a thorough analysis of the capacity of SHELAA sites – the Plan should not be progressed to Examination until this work has taken place.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (comment on Policies and Evidence Base - includes tables)</a>  <a href="#">Supporting document 1 (Transport advice - Land north of Meon Green, Forest Road, Waltham Chase)</a>  <a href="#">Supporting document 2 (Vision Document - Land South of Lower Chase Road, Waltham Chase)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32TQ-3
<b>Full reference number</b>	ANON-AQTS-32TQ-3/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Whilst Strategic Policy H1 outlines the authorities proposed housing provision we fear that the numbers proposed will not be enough to meet the ever-growing housing need the authority is going to be facing across the next plan period. For Otterbourne there is an expectation that there is capacity for 75 dwellings which we feel will not be enough to meet the settlements requirements across this next plan period. Given that the net completions within the settlement is only 2 dwellings over the last four years and with no current outstanding permissions as of 2023, Policy H1 is not enough especially when referencing the Written Ministerial Statement of July 2024 confirming the existence of acute housing needs and a national crisis of housing, which must be addressed now.</p> <p>The quantum of housing the authority is allocating does not acknowledge the very real housing need many settlements are facing, including Otterbourne, and in particular the affordable housing element. The Winchester District Authorities Monitoring Report 2022-2023 outlined that there were 382 affordable net dwelling completions monitored across the plan period which accounts for 37.2% of all net completions which is below the 40% target. There has been no activity regarding affordable housing development within Otterbourne or neighbouring Shawford.</p> <p>Our site at Otterbourne Road has capacity for circa 50-55 dwellings and is available immediately to meet the areas immediate housing needs. Furthermore any future development would of course be policy compliant in terms of tenure mix meaning Otterbourne would gain 22 affordable dwellings as per Policy H6 of the Draft Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The housing provision of Policy H1 will not be enough to meet Winchester's housing need across the entire plan period, especially when focusing on the affordable housing element.
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting information (comments on policies)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32TM-Y
<b>Full reference number</b>	ANON-AQTS-32TM-Y/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Whilst Strategic Policy H1 outlines the authorities proposed housing provision we fear that the numbers proposed will not be enough to meet the ever-growing housing need the authority is going to be facing across the next plan period. The total housing provision for Waltham Chase over the forthcoming plan period is 117 dwellings, 80 of which are being carried over as an existing allocation under Policy WC1. We firmly believe that Policy H1 does not go far enough especially when referencing the Written Ministerial Statement of July 2024 confirming the existence of acute housing needs and a national crisis of housing, which must be addressed now.</p> <p>The provision of housing the authority is allocating does not acknowledge the very real housing need many settlements are facing. Waltham Chase's existing singular allocation does not reflect the sustainability of the settlement and its capacity to deliver additional growth. The single allocation will not be enough to sustain the settlements housing needs over the entire plan period.</p> <p>Our site at Solomon's Lane would be able to help alleviate the immediate pressure Waltham Chase is going to face and should be allocated as additional sites to go alongside that at Morgan's Yard.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The housing provision of Policy H1 will not be enough to meet Winchester's housing need across the entire plan period, additional sites will need to be brought forward to alleviate the pressures many settlements are going to face.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Supporting information (comments on policies)</a></p>
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<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	O'Flynn Group
<b>Personal reference number</b>	ANON-AQTS-32TE-Q
<b>Full reference number</b>	ANON-AQTS-32TE-Q/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>While it is a requirement of national policy to have a local plan that looks ahead 15 years on adoption, there is no requirement to maintain a 20-year plan period and certainly not in order offset against future need and reduce the level of need for which is planned. There is no need for the start date to look back c. five years on adoption. Furthermore, the PPG states that “The method provides authorities with an annual number, based on a 10-year base line, which can be applied to the whole plan period.” (PPG 2a-012-20190220)</p> <p>The affordability ratio used in the standard method calculation is a nationally derived figure which compares average earnings and average housing costs. In this context, the affordability adjustment increases the uplift applied to the household projections to take account of under delivery (i.e. if insufficient homes are delivered to meet needs, then they become more unaffordable). The converse is self-evidently true of oversupply, if more homes are delivered than are required, then the ‘oversupply’ has a positive impact on affordability compared to what would otherwise be required. Therefore, if the Council has been ‘oversupplying’ against the standard method in the early years of the plan period, it would not be surprising if the standard method figure had fallen (or not worsened as it might otherwise have done), as the affordability position would start to improve moderating the scale of uplift is necessary. In this context, incorporating both the ‘oversupply’ figure and the latest annual revised standard method figures in the Local Plan’s assessment of housing need and supply plainly amounts to double counting. The reduction in the standard method level over the first four years of the Local Plan period is because of the ‘oversupply’.</p> <p>To address this point of unreasonable double counting and an unnecessarily early start date for the Local Plan than required by national policy, the plan period start date should be 2024. As set out above, it is not necessary for the Local Plan to cover a twenty-year period, simply a fifteen-year period on adoption. It is of note that the position on unmet need has a base date of 2023 and there is no reason why the Council should adopt a different position.</p>

The housing requirement of the Local Plan is not positively prepared because it does not accommodate as much unmet housing need of the PfSH area as it could or should. Indeed, it has not assessed how much it could feasibly accommodate. Further, the scale of unmet need is now only estimated between 2023 and 2036 when it is necessary for plans to look forward 15 years. The scale of unmet housing need in PfSH is not new and the broad scale of unmet housing need has been known for close to a decade.

The Council wrongly maintains throughout its Local Plan evidence base, as does the PfSH in its various documents, that the unmet housing needs position of the PfSH area collectively is uncertain. However, this approach is ducking and deferring the difficult decisions. In reality, the unmet housing needs position in PfSH will always be a moving feast and to not seek to positively plan for it in full now is a failure of a constructive duty-to cooperate process and will result in unmet need now and in the years before any future Local Plan (whereupon one might expected the LPAs collectively to re-base their assessment and wipe the slate clean). Statements that local plans will be reviewed several times to 2036 is not a positive or effective way to meet needs, because by then there will be more unmet needs emerging well beyond 2036. There will never be a complete alignment of local plans all adopted in a similar timeframe with clear, examined, conclusions on development capacity. As above, the stated 'snapshot' of housing need versus housing supply in the PfSH area over the past eight years, despite the time period changing, has consistently shown unmet needs at or above 10,750 dwellings.

Whilst this quantum of unmet housing need is not the sole responsibility of the Council, both Portsmouth and Havant LPAs have specifically asked Winchester to meet its unmet housing needs. The Council states that it is unable to say how much unmet need it can take until work on the Reg 19 Local Plan is complete and, in any event, the PfSH agreed Spatial Position Statement 2023 to meet housing shortfall in the South Hampshire area is the best approach in supporting any unmet housing need arising. This is an attempt to avoid the requirement to meet unmet needs. Firstly, if an LPA asks for help in meeting unmet housing need the council is seemingly not willing to accept that need until the requesting authority has had its plan examined and their identified capacity verified. However, that requesting authority's plan needs to have a strategy in place for its unmet housing needs on submission for examination as per NPPF paragraphs 11 a) and b). The Local Plan cannot be sound as it has not been positively prepared and nor is it effective.

The Broad Areas of Search referred to within the SPS arise from a piece of work commissioned by the PfSH (Broad Areas of Search for Growth Dec 2023) which mapped various development constraints to identify seven areas which fall within the PfSH area. These locations were subsequently included as a separate policy within the most recent PfSH Spatial Position Statement but no work at all has been undertaken to identify whether they are deliverable or developable or whether the land in question is available for

development or whether any respective landowners would be interesting in facilitating these areas of search for development. It must also be highlighted that it is not the responsibility of a sub-regional body to identify allocations for individual LPAs. Given the lack of any work being undertaken to establish the deliverability of these sites it should be considered most unlikely that firstly all the identified broad areas will result in future developments being brought forward, and secondly that those areas will be delivered to their maximum capacity within the period to 2036. Even where these fundamental concerns are set aside the Council should still be proactively looking to identify sites that could deliver additional housing to meet the remaining unmet need.

The Integrated Impact Assessment only assessed meeting either 14,000 homes in three scenarios (below the district's local housing need) or 15,620 homes in Option 3 which is shown within Table 4.1 of the document. The IIA accompanying the Reg 19 Local Plan is no different and does not consider how a higher quantum of development arising from the unmet need in the PfSH area might reasonably be accommodated within the District. It is unclear why no higher growth options have been assessed, and why since 2022 the Council has not been working positively from the start of its Local Plan work to consider higher growth options that would help to meet a greater amount of unmet need arising from the PfSH.

To be positively prepared and justified, and further to discharge the Duty-to-Cooperate, a constructive, active and ongoing co-operation on matters including unmet need was required. The O'Flynn Group considers that it the Council has not done this. Attending the PUSH/PfSH meetings and contributing to Position Statements does not demonstrate that the Council has engaged constructively in a way that is likely to solve an acute housing problem across the wider area. The lack of any dedicated unmet need buffer at Reg 18 stage, and then a subsequent lack of higher options testing within the IIA does not reflect a positive and active approach. It is clear that the Council did not at the Reg 18 stage or subsequently ever consider or test how much of the unmet need the district could accommodate. Further, the Council has been unwilling to reassess its development strategy to seek to meet unmet needs from PfSH.

While the Council claims it has tested reasonable alternatives and it only needs to pursue an appropriate strategy and not the most appropriate strategy, the alternatives tested are not reasonable. A reasonable alternative would test how much of the unmet need from the PfSH could be met, not the amount that can be met in pursuing their pre-determined spatial strategy.

As part of new planning policy proposals, the Government recently went to consultation on a revised NPPF and standard method calculation. The revisions to the standard method calculation have a particularly large effect across the PfSH area. Taking the proposed standard method and applying it to the PfSH area including

	Winchester results in the Local Plan unable to meet its own needs or around 6,000. Across the wider PfSH area the unmet of all the member authorities need would be c. 35,000.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies, Duty to Co-operate &amp; Evidence Base)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/4/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>While the previous Government made changes to the NPPF in December 2023, which diluted the obligation to meet minimum local housing needs generated by the standard methodology, the proposed reforms will remove this uncertainty. The new methodology is designed to be aligned more closely to the Government's aspirations and will achieve a more balanced distribution of homes across the country, by directing new homes to where they are most needed and are currently least affordable . This is the backdrop against which this plan is being consulted upon and will be examined, albeit the objective of the Council is to ensure that the 2040 plan is examined against the provisions of the 2023 version of the NPPF, which this Government has characterised as 'damaging for housing supply' . The new standard methodology generates an annual minimum housing need figure for Winchester district of 1,099 dwellings, compared to the figure of 676 dwellings generated by the original version.</p> <p>Winchester has maintained its position that the standard methodology is the appropriate arbiter of what a local plan housing requirement should be and therefore in due course will be required to accept that an appropriate starting point for housing supply within the district over a twenty-year plan period will be in the region of 20,000-22,000 dwellings. It is acknowledged that the planning authority is able to advance the 2040 plan against the objective of having the examination take place against the provisions of the December 2023 version of the NPPF. If the examination proceeds on this basis the resulting plan will include a housing requirement that is significantly below that required, such a position must be swiftly rectified.</p> <p>The proposed plan period commences in 2020, which will be around five years prior to the point at which the plan is submitted for examination, meaning that 25% of the period covered by the document will have elapsed by the time the policies within are subject to scrutiny via the examination process. Local plans are supposed to plan for the future, not the past. The standard methodology also bases the affordability adjustment it applies on the most recent data, which is the median affordability ratio for 2023, published in</p>

March 2024. It is therefore appropriate that the starting year of any plan should be that upon which the affordability ratio is based, in this case 2024, which will be the year prior to which the examination takes place.

Strategic Policy H1 makes provision for 15,115 dwellings over the twenty-year plan period which should be a minimum figure. The figure allocated as the Winchester contribution to unmet housing needs within the Partnership for South Hampshire (PfSH) sub-region is an unduly modest uplift to the baseline LHN figure and will manifestly not address the scale of unmet needs that will arise within the PfSH area. The combined shortfall for the four authorities that have confirmed they are unable to meet their housing needs in full will increase significantly to 30,725 dwellings with the introduction of the new standard methodology. In this context the 900-dwelling provision in the Fareham Local Plan and the 1,900 dwelling allowance identified within the 2040 plan are significantly below the future provision that will be required. Currently, the aggregated figures achieve less than 14% of the unmet need arising in Southampton, Portsmouth, Gosport, and Havant, falling to less than 10% against the new standard methodology.

It is clear from the Statements of Common Ground ('SOCG') published alongside the Regulation 19 consultation document that both Havant and Portsmouth (two of the four PfSH authorities unable to meet their own needs) consider the contribution of 1,900 dwellings towards the unmet needs to be insufficient. Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council to address the matters raised in earlier representations or the letter of 5th March 2024. The new local plan provides an opportunity to address unmet needs arising within the PfSH area in the part of the district that is closest to where the need arises and which, by the Council's own admission, has a strong functional relationship with the urban areas to the south. It would be sensible and appropriate to assign the existing committed growth, and minor extensions proposed in the SHUA part of the district to meeting the shortfalls that will arise within the wider PfSH area. This would not require further land to be developed within these marginal areas, eroding the levels of separation achieved or denuding areas of green space, it would merely require that the 'core' housing requirement to be provided for by the Local Plan (derived from use of the SM/LHN) is met elsewhere in the district beyond the SHUA area. This would be via an increase in the level of growth assigned to Winchester Town, which quite apart from considerations relating to the level of unmet need arising from the PfSH area, would positively meet other key objectives and structural challenges faced by the Local Plan.

In following such an approach, the SHUA commitments and allocations at West of Waterlooville/Newlands and Whiteley – 5,650 dwellings - could be assigned to accommodating unmet needs arising within the PfSH area. This would necessitate a corresponding increase in the housing requirement for Winchester Town, creating greater opportunity for people to live and work in close proximity by delivering housing to meet the

	needs of those workers currently commuting into Winchester from the PfSH area on a daily basis. Increasing supply at Winchester Town would facilitate the creation of supply 'headroom' within the PfSH area, therefore responding to the unmet need that is forecast to arise indirectly through provision of housing for in-bound Winchester commuters who reside currently in the PfSH area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	As set out above the policy should be revised to incorporate a proportionate uplift in the housing requirement for the district to meaningfully address the scale of unmet housing needs arising in the PfSH area, in respect of which insufficient regard has been paid in advancing the 2040 plan to Regulation 19 stage.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting Document (Planning for South Hampshire)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Andrew Uwins
<b>Personal reference number</b>	ANON-AQTS-3BBP-Z
<b>Full reference number</b>	ANON-AQTS-3BBP-Z/5/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Hazeley consider that ideally WCC should be planning for their new draft standard method requirement of 1,099 dwelling per annum or 20,333 dwellings across the current plan period (1 April) 2020 to (31 March) 2040 or 18,683 dwellings across the plan period above (1 April) 2024 to (31 March) 2041. These numbers are noted to be before the unmet need allowance is added. Once the unmet need amount is incorporated, WCC would have a shortfall of 6,418 dwellings and 7,938 dwellings respectively for the two plan periods. WCC therefore need to include an increased number of allocations within their Local Plan.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on policies - includes pictures)</a>



*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Alice Lack
<b>Personal reference number</b>	ANON-AQTS-327B-Q
<b>Full reference number</b>	ANON-AQTS-327B-Q/5/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Welbeck note that WCC should be taking on a greater proportion of the PfSH unmet need – under both the current need requirements which as planned for would result in a c. 9,000 dwelling shortfall until the next plan period and under the new shortfall of over 35,000 once the draft standard method is published. The reason for the lack of adequate provision to PfSH is clear within the SoGC from Havant Borough Council which notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from WCC. This is deemed unacceptable and raises issues regarding the legal compliance and soundness of the plan.</p> <p>As detailed in Welbeck’s’ Reg 18 reps, being sustainably located, environmentally unconstrained and located in the south-east of the District close to PfSH neighbours (Havant and Portsmouth), Land at MEF is well placed to accommodate this additional housing.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Policy H1 sets out the housing requirement as it applied to the Winchester Local Plan. We support the approach to calculating local housing need using the Standard Methodology. In particular the approach to setting the housing requirement, as set out in Table 1 on page 215 of the Local Plan, is supported, particularly the way that the Council has chosen to calculate housing need over the first 4 years of the plan period from 2020, acknowledging that the calculation of local housing need has fluctuated over these years. It is noted that the calculation of the housing requirement set out in Table 2 includes an allowance for assisting in accommodating unmet housing need from neighbouring local authorities, and also an allowance for housing need in the South Downs National Park. The Council's approach to accommodating unmet need is also supported.</p> <p>The housing provision 15,465 homes matches exactly the housing requirement (including the South Downs National Park allowance). It is generally considered good practice for a Local Plan to set out an over-supply, or buffer in the supply of housing land to firstly provide some flexibility in the housing supply and secondly to ensure that housing needs will be met over the plan period. We would therefore suggest that the Local Plan set out a buffer of at least 10%, equating to 1,547 homes, over the plan period.</p> <p>Should the Local Plan be submitted for Examination within one month of the emerging NPPF being published in final form, it is acknowledged that under the transition arrangements set out in the draft NPPF published in July 2024 the Winchester Local Plan would go on to be examined under the 'old' December 2023 NPPF. The new standard method calculations were set out alongside the NPPF consultation and included details of the new housing need 'target' compared to the current figure for each local authority in England. In Winchester, the local housing need figure calculated using the current standard method is 676 dpa, this local housing need figure increases by 423 homes each year to 1,099 dpa. If the Council submit the Local Plan in time to fall under the transition arrangements, and the plan is then found sound and adopted following examination,</p>

	<p>the transition arrangements make clear that the Council should update the Local Plan to take account of the new, higher housing need figures.</p> <p>In Winchester’s case, as set out above the new housing need figure is 423 homes higher than the previous housing need figure. It should also be noted that the housing requirement in the Regulation 19 Local Plan is 773 dpa – because the plan makes provision to accommodate the unmet need of adjacent authorities, leading to a total uplift of 1,500 homes over the plan period. However, this figure is still 326 homes a year lower than the housing need figure calculated using the new standard method. Therefore, if Winchester submit their draft Local Plan for Examination under the transition arrangements set out in the draft NPPF the draft Local Plan will be examined under the December 2023 NPPF including the previous local housing need assessment, but upon adoption will then need to be quickly updated to take account of the higher housing need figures derived using the new standard method.</p> <p>The timing of the Regulation 19 Local Plan consultation, and therefore of the submission of the Local Plan for examination, clearly suggest that significant time could pass following publication of the new NPPF while the Local Plan is being examined. More time will then elapse while the Council develops a new Local Plan to account for the shortfall in housing need identified above. It could therefore be several years before a Local Plan for Winchester is in place which responds to the new housing need set out under a new NPPF. During this time, it is uncertain how housing delivery in the district will respond to the new housing targets, or to the Government’s clear agenda to significantly increase housing delivery to boost the economy and address the worsening housing crisis.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>We would therefore suggest that the Council has two choices in order to address this issue:</p> <ol style="list-style-type: none"> <li>1. Delay submission of the Local Plan, and immediately begin to identify new sites and locations for development to meet the new housing need set out in the new NPPF. Following this approach would enable the Council to quickly move to meeting the new housing need figures and addressing the housing crisis in the district.</li> <li>2. If the Council alternatively wishes to move to submitting the Local Plan, making changes to policies in the Local Plan – for example Policy SP3 and the approach to settlement boundaries – to enable more sites to be considered for development. Undertaking a review of the policies in the plan in this way would increase the flexibility of the housing land supply, and enable the Council to take a pragmatic approach to meeting housing need while a new Local Plan is developed.</li> </ol> <p>If neither of these routes is followed, although the Council may have technically followed the guidance contained in the emerging NPPF, the result will be that housing needs will not be met and the Council will not be following the clear national policy direction and the spirit of the approach set out in the new NPPF.</p>

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	The Clay Family
<b>Personal reference number</b>	ANON-AQTS-32MY-4
<b>Full reference number</b>	ANON-AQTS-32MY-4/3/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Table HI indicates that the housing requirement is 13,565 homes over the plan period, it is disappointing that the Council have not set out that this figure should be a minimum number of homes to be delivered over the plan period, as required by the current standard method set out in the NPPF. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Winchester district.</p> <p>The revised standard method is intended to support the Government's ambition to deliver 1.5 million homes over the next five years. It is therefore considered that the Council should look to increase the housing requirement and therefore provision to ensure that it is appropriately and sufficiently planning for growth, in accordance with the Government's current housing targets. Only 2875 (18.6%) are new proposed allocations in the Regulation 19 Local Plan and 1,895 ( 12%) dwellings have been indicated as windfall development. In our view, the plan has not been positively prepared and will therefore not meet the tests of soundness with only 18.6% of the housing provision over the plan period coming from new allocations. We therefore urge the Council to look at allocate further sites to boost and bolster the housing supply throughout the plan period. We also strongly suggest the Council does not seek to 'hold' greenfield sites back until later in the plan period.</p> <p>There is an over reliance on previously allocated sites, some of which have been built out and others which are complex brownfield sites which have not come forward in previous plan periods. Therefore, the deliverability of several of the allocated sites proposed to be carried over from the current Local Plan is questioned. The Levelling Up and Regeneration Act has identified that there is a problem of allocated sites not coming forward for development and has put in place legislation to try to prevent this. Therefore, if a site cannot be demonstrated as available, suitable and achievable, it should not be included as an allocation,</p>

	<p>unless an explanation can be provided as to why it has not been delivered to date and why it can now be considered deliverable. Without this justification, these sites should be deleted.</p> <p>Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of the proposed sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council needs to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further small and medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a></p>



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Tessa Robertson
<b>Personal reference number</b>	ANON-AQTS-32MT-Y
<b>Full reference number</b>	ANON-AQTS-32MT-Y/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>As we made clear in our response to the Regulation 18 draft local plan consultation, the Dever Society welcomes the Council's clear rejection of Approach 3 (as described in the Strategic Issues and Priorities consultation document) and agrees with the statement in paragraph 9.10 that "its promotion of large-scale greenfield development is at odds with priorities of maintaining the viability of existing centres, reducing travel and carbon emissions, and making best use of brownfield land."</p> <p>In its response to the SIP consultation, the Dever Society made detailed arguments on why large new settlements in the countryside would be the most unsustainable option for Winchester District. We also made specific reference to the unsustainability of the proposals for a large new town on farmland surrounding the small settlement of Micheldever Station. These points are still relevant and we ask that they be taken into account in this consultation.</p> <p>The promoters of the new town at Micheldever have made it very clear that they will continue to push for the inclusion of the new town in the Local Plan throughout the Local Plan process. They argue that Winchester will be required to take a significant proportion of the unmet need from the PfSH area, that this will require it to find new sites to accommodate its own housing allocation elsewhere in the district and that Micheldever new town provides a viable location. We fundamentally disagree with this. A large new development at Micheldever will do nothing to help fulfill housing need in the south of the district.</p> <p>Recently the new town promoters have offered to join up the new town with the 3,000 home 'garden village' proposed by Basingstoke and Deane Borough Council on Popham Airfield. No doubt they will be putting the large new town resulting from this forward for consideration by the Government's New Town Task Force. However, a large new town in this location was submitted by the previous developer of the scheme to Gordon Brown's Eco-town initiative and was soundly rejected, primarily on transport grounds. The assessment carried out by the Department of Transport and the Highways Agency concluded that there were "Very significant issues – rail congestion on Waterloo/Winchester line with trains at capacity. Major investment would be needed. Scheme not clear on employment and likely to increase out-commuting. Compounded by major congestion on M3 /Basingstoke area. Risk of increase." As a result of this assessment, the proposed</p>

	<p>new town at Micheldever Station was rated D on transport on a scale of A to D, where D was defined as "high level constraints – reasons why growth in this location is unsustainable."</p> <p>It was also rated C for environmental reasons, primarily because of water quality issues relating to the Rivers Dever and Test.</p> <p>None of these issues has changed since this assessment in 2008; if anything, they have worsened.</p> <p>We welcome the Council's continued opposition to large new settlements in the countryside despite pressure from developers.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	George Whalley
<b>Personal reference number</b>	BHLF-AQTS-32EY-V
<b>Full reference number</b>	BHLF-AQTS-32EY-V/3/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Policy H1 which is not justified, effective or consistent with national policy. The proposed distribution of development is not in accordance with the settlement hierarchy and a higher level of growth should be directed to the Market Towns rather than less sustainable rural settlements such as Sutton Scotney and South Wonston. The Market Town of Bishops Waltham is a sustainable location with good site options capable of accommodating a higher proportion of growth than currently identified in the Local Plan.</p> <p>The proposed allowance of 1,900 dwellings towards unmet housing need from neighbouring authorities is insufficient to address definitive unmet housing need in the area which currently stands at 25,113 dwellings and rises to at least 33,521 dwellings with the proposed revised standard method. The policy should be amended to identify additional green field sites to address this need in accordance with the settlement hierarchy including adjacent to the Market Town of Bishops Waltham.</p> <p>Policy H1 includes a contribution of 1,900 dwellings towards unmet housing need but does not include a buffer for flexibility. The 1,900 allowance towards unmet housing need from neighbouring authorities is not justified as this does not contribute sufficiently towards addressing definitive unmet housing need within the Partnership for South Hampshire (PfSH) area. It also does not contribute sufficiently to the level of unmet housing need in the area that will arise from the revised NPPF and proposed changes to the standard method. The PfSH Spatial Position Statement (SPS)<sup>3</sup> does not set out an effective strategy for addressing unmet housing need in the area. The SPS identifies a shortfall of 11,771 dwellings. It is considered that this is a significant underestimate of current unmet housing need which will also rise significantly with proposed changes to the NPPF and revised standard method.</p>

	<p>To address unmet housing need in the longer term, the SPS identifies Broad Areas of Search for Growth capable of delivering approximately 9,700 dwellings. The current Broad Areas of Search in the PfSH area are unlikely to be able to provide for unmet need and particularly in relation to the Government's proposed changes to the NPPF and standard method. A Broad Area of Search has been identified in Winchester District (East of Botley). The Winchester Local Plan is not proposing allocations within this area of search. Therefore, unmet housing need from neighbouring authorities will need to be accommodated in accordance with the settlement hierarchy including on sustainable sites adjoining the settlement boundaries of higher order settlements including the Market Town of Bishops Waltham.</p> <p>There is currently definitive unmet housing need from neighbouring authorities including Havant, Portsmouth, Southampton and Gosport Councils which has not been provided for in Winchester District or in neighbouring authority areas. It is anticipated that there will also be unmet housing need from the South Downs National Park in relation to landscape constraints and past rates of housing delivery. Unmet housing need for these authorities currently totals 25,111 dwellings which rises to 33,521 dwellings with the proposed revised standard method. Following the proposed revised NPPF and changes to the standard method there is significant potential for unmet housing need to arise from Basingstoke and Deane Borough Council, East Hants District Council, New Forest District Council, Test Valley Borough Council, Eastleigh and Fareham. There is no effective strategy in place with neighbouring authorities to provide for the definitive unmet need from Havant, Portsmouth, Southampton and Gosport Councils or anticipated unmet need from other adjoining and PfSH authorities. The Winchester Local Plan and Policy H1 should be amended to provide a higher level of housing to help address unmet housing need. This can be delivered in accordance with the settlement hierarchy including within sustainable settlements such as the Market Town of Bishops Waltham.</p> <p>It is standard practice in the preparation of Local Plans in the area to provide a 10% buffer over and above LHN to provide flexibility in supply to ensure that housing needs are met during the Plan period. The Plan does not propose to apply a buffer as the Council consider that there is sufficient certainty on housing delivery with 64% of the District requirement met by dwellings that have either been completed or have planning consent and 25% of the housing supply is from new allocations. It is considered that the Council's approach is not justified or effective and an appropriate buffer should be applied to take account of non-implementation of planning permissions and potential change in timeframes for the delivery of strategic sites.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Supporting information (commenting on policies and proposed site)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Mr N Craig-Harvey
<b>Personal reference number</b>	BHLF-AQTS-32ED-7
<b>Full reference number</b>	BHLF-AQTS-32ED-7/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>RESPONSE TO HOUSING PROVISION</p> <p>4.1 The response to Strategic policy H1 and the housing provision for the plan period, in relation to the potential development of land at Dean Down Drove is as follows: SUMMARY</p> <ul style="list-style-type: none"> <li>• The Council have over relied previously allocated sites in the housing requirement figure (para 9.18 and Table H1).</li> <li>• It is unrealistic to rely on NDP areas to deliver over the plan period since they are at an early stage of preparation.</li> <li>• In order to deliver the government’s housing targets it is possible that the Council should further support the unmet needs of neighbouring local authorities (Table H2)</li> </ul> <p>Strategic policy H1 – Housing Provision</p> <p>4.2 Paragraph 9.18 of the draft local plan states that “There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2020), or which are allocated by the existing Local Plan but have not yet been developed”. Breaking down the housing requirement figure put forward, only 2,876 (18.6%) of those dwellings are from new allocations. In our view, this is too low a proportion and this should be increased. There are more deliverable sites available, as identified through the 2023 SHEELA which could provide a more secure form of housing supply.</p> <p>4.3 There appears to be an over reliance on previously allocated sites, some of which form complex brownfield sites which notably have not come forward in previous plan periods (e.g. Station Approach, the Central</p>

Winchester Regeneration Area and Clayfield Park). Therefore, the deliverability of such sites is questioned. If a site cannot be demonstrated as available, suitable and achievable, it should not be included as an allocation. Without sufficient justification, these previously allocated sites should potentially be deleted.

#### 4.4

Further, the draft local plan refers to Neighbourhood Plan (NDP) designated areas to contribute to the housing requirement figure. However, the status of those NDPs and potential allocations within them are at early stages of preparation and it is unrealistic to rely

Land at Dean Down Drove

on

those NDP areas to deliver over the plan period. The Council should be confident these homes will come forward through the respective NDPs. Otherwise, further sites in areas should be allocated to ensure the required homes come forward.

#### 4.5

Table H1 sets out the housing requirement figure for the district as 13, 565, as calculated using the standard method. However, this method is generally used to calculate a minimum number of homes and the Council should therefore add a buffer margin above the figure (as per paragraph 61 of the NPPF and Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205).

#### 4.6

The proposed changes to the NPPF seek to significantly boost housebuilding in order to deliver the Government's commitments to build 1.5 million new homes and include a new standard method for calculating housing need. It is anticipated these changes will increase numbers and the Council should plan for this potential uplift and increase their figures accordingly.

#### 4.7

In order for the Local Plan Review to meet the 'positively prepared' test of soundness, the Local Plan review must "provide (ing) a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development"<sup>1</sup>.

Table H2 sets out the additional housing provision to meet the unmet need arising from neighbouring authorities. However, in the light of the new Government's ambitious housing targets it is considered that this provision will also need to increase, as those neighbouring authorities will need to take account of the proposed revisions to the NPPF. For example, Southampton City Council's housing need may increase by a further 15% under the proposed new standard method for calculating housing need.

#### 4.8

The Council should be more ambitious in its overall housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PfSH) area, in accordance with NPPF guidance.

	<p>4.9 Another pertinent point to note is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of those allocated sites. The requirement for BNG onsite 1 as required by paragraph 35 a) of the NPPF Land at Dean Down Drove may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council needs to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable.</p> <p>4.10 The Council should look to smaller sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement. As set out in Section 2 of these representations, the land at Dean Down Drove provides a great and realistic opportunity to allocate further land in an accessible, sustainable location. Whilst it is a small site, it would deliver some of the required housing needs of the District, over the early stages of the plan period.</p> <p>5.0 CONCLUSION</p> <p>5.1 The land at Dean Down Drove presents a rare opportunity to develop a small site which can deliver much needed housing immediately.</p> <p>5.2 The site location allows for a logical extension to the settlement boundary for Littleton and would make an important contribution to the District's housing land supply figure.</p> <p>5.3 The site should be included in any shortfall identified in the Council's housing provision which will inevitably arise as a result of the Government's ambitious building targets, recently reflected in the latest proposed changes to the NPPF.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	



<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (commenting on policies and site promotion)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Mary Goodwin
<b>Personal reference number</b>	BHLF-AQTS-32EK-E - Test Valley Borough Council
<b>Full reference number</b>	BHLF-AQTS-32EK-E - Test Valley Borough Council/2/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We note that the Winchester District's Regulation 19 Local Plan proposes to meet the Districts current housing needs in full, including a 'buffer' of housing supply to help contribute towards a wider shortfall or unmet need in the area. As set out in the Test Valley Draft Local Plan 2040, Regulation 18 (Stage 2), we also proposed to meet our proposed housing requirement in full, based on the current NPPF. However, we did not take on any potential unmet needs from outside our area, in terms of housing or provision for gypsies and travellers.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	English Oak Care Homes
<b>Personal reference number</b>	BHLF-AQTS-32EJ-D
<b>Full reference number</b>	BHLF-AQTS-32EJ-D/2/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Table H1 indicates that the housing requirement, as calculated using the standard method, is 13,565 homes over the plan period. It is disappointing that the council have not set out that this figure should be a minimum number of homes to be delivered over the plan period, as required by the current standard method set out in the NPPF. We therefore encourage the council to indicate this figure to be the minimum housing need to be ambitious to allocate a sufficient number and variety of sites to ensure that the Local Plan seek to support the Government’s objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Winchester district.</p> <p>It is pertinent to note that new standard method is proposed to use a baseline set at a percentage of existing housing stock levels, top up this baseline using a stronger affordability multiplier and remove arbitrary caps and additions so that the approach is driven by an objective assessment of need. The current housing requirement proposed in the Local Plan is not ambitious enough to achieve the Government’s housing targets. The council should look to increase the housing requirement to ensure that it is appropriately and sufficiently planning for growth, in accordance with the Government’s housing targets.</p> <p>The plan has not been positively prepared with only 18.6% of the housing provision over the plan period coming from existing commitments. We therefore urge the council to look at allocate further sites to boost and bolster the housing supply throughout the plan period. There is an over reliance on previously allocated sites, some of which have been built out and others which are complex brownfield sites which have not come forward in previous plan periods (namely Station Approach and the Central Winchester Regeneration Area formerly Silver Hill). Therefore, the deliverability of several of the allocated sites proposed to be carried over</p>

	<p>from the current Local Plan is questioned, particularly those which include the provision of older person and specialist homes which at present are mainly complex brownfield sites.</p> <p>Winchester District needs to plan to accommodate some of the unmet need arising from the neighbouring authorities as required by the PfSH Statement of Common Ground. In light of the new Government's ambitious housing targets and the aging population, as evidenced in the Need and Demand Report submitted with these representations, it is considered that the unmet need from neighbouring authorities could increase and therefore, in accordance with the PfSH Statement of Common Ground, further provision should be made to accommodate the resultant unmet need to ensure the plan is effective and meets the tests of soundness. Further, it is acknowledged that older person and specialist housing provision can be provided in Winchester as it is centrally located in the PfSH area.</p> <p>Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of these sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council need to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement As set out in Section 4 of these representations, the land at Shedfield Lodge provides a key opportunity to allocate further land in a highly accessible, sustainable location to deliver the required housing Winchester needs over the plan period. Further detail in supporting information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting document 1 (need/demand report for Oak Care Village)</a></p>
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<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	OWEN JONES
<b>Personal reference number</b>	BHLF-AQTS-326Y-D
<b>Full reference number</b>	BHLF-AQTS-326Y-D/2/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>3 Strategic Policy H1</p> <p>3.1. Strategic Policy H1 intends that provision is made for 15,115 dwellings over the plan period of 2020 to 2040.</p> <p>3.2. This is to be read and understood in the context of the Objectives which the consultation document explains at Section 3. For the reasons set out below, this is not achieved and the Plan is not effective.</p> <p>3.3. Table H1 explains the calculation of the housing requirement derived from the Standard Method, to which is added an amount to accommodate some unmet need for elsewhere in the PUSH area. A further adjustment is made to allow for likely housing in the National Park.</p> <p>3.4. The LPA intend to progress the Local Plan ahead of amendments to the NPPF coming into effect. The practical effect of this is that, because of the likely increase in local housing need, there will need to be an immediate review of the Local Plan. Presently, the revision to the standard method suggests that the housing requirement for the plan area would increase from 676 dpa to 1,099 dpa.</p> <p>3.5. Moreover, whilst the plan makes some provision for unmet need, the scale of that shortfall across the PUSH area is also expected to increase in the constituent areas.</p> <p>3.6. For these reasons it is evident that there is a significant challenge ahead of the LPA to achieve the step change in new housing that is expected. In this context, this version of the Local Plan should be seen as a minimum amount of new housing. Where opportunities exist to increase housing supply they should be seized upon as part of a positively prepared strategy.</p> <p>3.7. We are aware of representations from amongst others the Home Builders Federation (HBF) that cite significant issues with the implementation of the duty to co-operate which raises fundamental questions about the soundness of the plan in any event.</p> <p>3.8. We also concur with the representations made regarding the plan period with the intent to reduce the residual requirement on account of past delivery rates. The NPPG is clear on how the plan should be prepared in this regard and the plan period for calculating the housing requirement should be amended accordingly.</p> <p>Housing supply</p>

	<p>3.9. The Council's housing supply strategy estimates that it can deliver 15,441 new homes between 2020 and 2040. This should be contrasted with the requirement 15,115 dwellings in Strategic Policy H1. It is inescapable that this represent a theoretical oversupply of just 300 new homes or 2%. This is an inadequate degree of contingency or flexibility and it is much more common to have significantly higher flexibility allowances. Increasing this to 10%, which is not uncommon, would require land for an additional 1,200 new homes to be identified.</p> <p>3.10. If, as the HBF contend, the plan period is amended to start at 2024, the supply over the remaining 17 years to 2040 is less than the corresponding requirement - a supply of just 12,200 compared to a requirement of 13,392 new homes. This illustrates the reliance that has been placed on past completions to meet future needs.</p> <p>3.11. In short, over the next 17 years fewer homes will be built than the required amount over that same period. That cannot be consistent with the Government's intention that the supply of new homes is increased. The Written Ministerial Statement of July 2024 signals the direction of travel:          "We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home          We are therefore updating the standard method and raising the overall level of these targets – from around 300,000 to approximately 370,000."</p> <p>3.12. Even if the District Council wish to avoid preparing a plan pursuant to expected changes in the NPPF, it must recognise that it isn't providing the increased housing supply that is necessary to "meet local needs".</p> <p>3.13. Accordingly, Strategic Policy H1 and the housing supply component are not sound propositions; they are neither justified, effective or positively prepared.          see supporting information for further detail</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	



<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (Commenting on policies)</a> <a href="#">Supporting Information (Site promotion - Land at Hambleton Road, Denmead)</a></p>
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<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/3/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy H1</p> <p>4.1 This policy is considered to be:</p> <ul style="list-style-type: none"> <li>• Not legally compliant</li> <li>• Not sound</li> <li>• Not in compliance with the duty to co-operate</li> </ul> <p>4.2 Winchester District Council (WDC) is seeking to meet its identified housing needs by providing 15,115 dwellings (net) within the plan period and expecting the South Downs National Park (SDNP) to deliver 350 additional homes within the plan period. Housing development is distributed between Winchester Town (5,640 dwellings), South Hampshire Urban Areas (5,650 dwellings) and Market Towns and Rural Area (3,825 dwellings).</p> <p>4.3 The justification for the local plan period of 2020 to 2040, based on section 2 of the Housing Topic Paper (July 2024) includes allowance for “some of the Council’s recent good performance in terms of housing completions to be taken into account, as there is no specific provision in the NPPF or Planning Practice Guidance for past over-supply”. It can therefore be assumed that, should the Council not have been able to demonstrate good performance, the plan period would likely have been set differently to exclude those years.</p> <p>4.4 This approach is not acceptable and not in line with para 35 of the adopted NPPF, requiring plans to be positively prepared, justified, effective and consistent with national policy. The plan period should therefore be adjusted to the most recent available Standard Method figures, reflected by the April 2024 affordability ratio, thereby set from 2024 over a 20-year period to 2044. To clarify, a 20-year plan period is considered essential to be able to deliver the proposed allocations, particularly strategic, large-scale sites and sites with multiple landownerships.</p> <p>4.5 To make this policy sound, the plan period should be amended to 2024-2044, with additional sites required to meet the OAN and the spatial distribution of growth aligned with the increased housing requirements. The policy should therefore be amended to include a significant uplift of the proposed provision of 15,115 dwellings (net), including the distributed proposed housing provision in subsections i. (5,640), ii. (5,650) and</p>

	iii (3,825). see additional info PDF
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	James McAllister-Jones
<b>Personal reference number</b>	BHLF-AQTS-326A-N
<b>Full reference number</b>	BHLF-AQTS-326A-N/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H1: Housing Provision</p> <p>Table H1 at paragraph 9.14 sets the Housing Need using Standard Method from 2024 as 676, with total sixteen-year requirement to 2040 as 10,816. However, as set out above, the Plan should be extended to at least 2041 to ensure the Plan period covers at least 15 years and so a further 676 dwellings must be identified in the Plan to ensure it is in accordance with Paragraph 22 of the NPPF, or the Plan cannot be found sound.</p> <p>Furthermore, Annex 1 of the emerging NPPF sets out transitional arrangement for Local Plans and suggests that even if the Plan is submitted under paragraph 226c, given the annual housing requirement will be 343 dwellings lower than the new Local Housing Need figure, there will be a requirement to undertake an immediate Review of the Plan to accommodate the minimum 2,145 dwelling shortfall.</p> <p>In light of the short plan period, and the need to ensure the Plan accords with the emerging annual housing need, it is recommended that the Council identify new housing allocations to cover the additional 2,821 need (676 additional year + 2,145 new SM).</p> <p>Accordingly, it would be more appropriate for the Plan to seek to meet these needs now, avoiding the need for a review.</p> <p>The current approach to housing delivery is unsound as it fails to meet housing needs in full without providing adequate justification to support its approach. The Council must revisit the housing need across the plan period prior to submission to consider options for meeting needs in full to facilitate the delivery of new homes. see additional info PDF</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a> <a href="#">Supporting information (vision document)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	New Forest District Council
<b>Personal reference number</b>	BHLF-AQTS-326X-C - New Forest District Council
<b>Full reference number</b>	BHLF-AQTS-326X-C - New Forest District Council/1/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website Meeting Housing Needs (draft Strategic Policy H1)</p> <p>NFDC notes that, as set out in proposed Strategic Policy H1 of the pre-submission Local Plan, Winchester City Council is proposing a housing target of 15,115 dwellings (average of around 756 dwellings per annum) for the Plan period 2020-2040, and that this includes a proposed contribution of around 1,900 dwellings towards the unmet needs of neighbouring areas in the Partnership for South Hampshire (PfSH) area. The current (as of March 2024) standard method housing need figure for Winchester is 676 dwellings per annum. However, the Government has recently consulted on proposed changes to the National Planning Policy Framework (NPPF) and on a proposed revised standard method for calculating housing need. Under the proposed revised standard method, the housing need figure for Winchester would be 1,099 dwellings per annum (21,980 dwellings over a 20-year period).</p> <p>Against the proposed revised standard method housing need figure, the pre-submission Local Plan would not meet its housing need and there would be a housing shortfall of approximately 6,865 dwellings, equating to approximately 343 dwellings per annum. The proposed NPPF changes also highlight the importance of meeting housing needs and of strategic planning. Under the likely forthcoming NPPF update, housing need under the proposed revised standard method will increase significantly for the southern Hampshire and Isle of Wight region. Additionally strategic planning is proposed to have notably increased importance. Due to these factors, in particular the scale of the housing need, NFDC believes Winchester City Council should give serious consideration to including a policy that commits to undertake an early review of the Winchester Local Plan. This is to provide an appropriate mechanism within the Local Plan to enable consideration of how the housing need of Winchester and of the wider southern Hampshire region should be considered strategically (through PfSH and other partners) across an appropriate geography. NFDC would encourage Winchester City Council to continue to engage positively with PfSH on this strategic matter.</p>
<b>What modification(s) are necessary to make the</b>	NFDC believes Winchester City Council should give serious consideration to including a policy that commits to undertake an early review of the Winchester Local Plan.

<p><b>policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (Copy of form - refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Fareham Borough Council
<b>Personal reference number</b>	BHLF-AQTS-3266-A - Fareham Borough Council
<b>Full reference number</b>	BHLF-AQTS-3266-A - Fareham Borough Council/4/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website  Strategic Policy H1 - Housing Provision  Fareham Borough Council supports this policy in planning for meeting the needs of Winchester and welcomes the inclusion of an additional 1,900 dwellings unmet need allowance. This Policy plans positively for wider sub-regional needs and considerations and demonstrates collaborative working through the Duty to Cooperate.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on policies)</a>



*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	YMCA Fairthorne Manor Group   Philipa Spicer
<b>Personal reference number</b>	BHLF-AQTS-328Y-F
<b>Full reference number</b>	BHLF-AQTS-328Y-F/3/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The Local Plan, at Strategic Policy H1 included a contribution towards the unmet needs of adjoining areas and provides for the development of about 15,115 dwellings (net) in this period (excluding the South Downs National Park area). The policy directs development in accordance with the Local Plan's spatial strategy as follows:</p> <ul style="list-style-type: none"> <li>• Winchester Town – about 5,640 dwellings;</li> <li>• South Hampshire Urban Areas – about 5,650 dwellings;</li> <li>• Market Towns and Rural Area – about 3,825 dwellings.</li> </ul> <p>6.39 Paragraph 9.23 relates to phasing and confirms that the Council's intention is to slow down the rate of delivery, it states "it is necessary to phase the greenfield allocations towards the latter parts of the Plan period so as to maintain a reasonable level of provision in these phases and prevent all housing provision from being built out in the early years of the Local Plan" (underlining is our emphasis). The Council accepts that we are in a housing crisis, and notes that the Standard Method is changing, and uses past completions to bolster its supply; so we are at a loss to understand why the Council wishes to slow down the supply of new homes? The phasing diagram on page 218 of the Local Plan, shown below, confirms that the delivery of homes would be expected to be faster if the Council did not interfere. This is a concern to us, and we ask that the phasing be reviewed to boost the supply of new homes urgently.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (Table of policies)</a> <a href="#">Letter (commenting on Policies and Evidence Base - includes vision document))</a> <a href="#">Supporting document 1 (Vision Document)</a> <a href="#">Supporting document 2 (Vision Document)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bellway Strategic Land   Daniel Poole
<b>Personal reference number</b>	BHLF-AQTS-3289-F
<b>Full reference number</b>	BHLF-AQTS-3289-F/2/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The Local Plan, at Strategic Policy H1 included a contribution towards the unmet needs of adjoining areas and provides for the development of about 15,115 dwellings (net) in this period (excluding the South Downs National Park area). The policy directs development in accordance with the Local Plan's spatial strategy as follows:</p> <p>31</p> <ul style="list-style-type: none"> <li>• Winchester Town – about 5,640 dwellings;</li> <li>• South Hampshire Urban Areas – about 5,650 dwellings;</li> <li>• Market Towns and Rural Area – about 3,825 dwellings.</li> </ul> <p>5.36 Paragraph 9.23 relates to phasing and confirms that the Council's intention is to slow down the rate of delivery, it states "it is necessary to phase the greenfield allocations towards the latter parts of the Plan period so as to maintain a reasonable level of provision in these phases and prevent all housing provision from being built out in the early years of the Local Plan" (underlining is our emphasis). The Council accepts that we are in a housing crisis, and notes that the Standard Method is changing, and uses past completions to bolster its supply; so we are at a loss to understand why the Council wishes to slow down the supply of new homes? The phasing diagram on page 218 of the Local Plan, shown below, confirms that the delivery of homes would be expected to be faster if the Council did not interfere. This is a concern to us, and we ask that the phasing be reviewed to boost the supply of new homes urgently.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (with table)</a> <a href="#">Letter (commenting on policies - includes tables and pictures)</a> <a href="#">Supporting document 1 (Vision Document - Botley Road, Bishops Waltham)</a> <a href="#">Supporting document 2 (pre-application advice from Historic England)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bargate Homes   Jonathan Quarrell
<b>Personal reference number</b>	BHLF-AQTS-3288-E
<b>Full reference number</b>	BHLF-AQTS-3288-E/1/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The Local Plan, at Strategic Policy H1 included a contribution towards the unmet needs of adjoining areas and provides for the development of about 15,115 dwellings (net) in this period (excluding the South Downs National Park area). The policy directs development in accordance with the Local Plan's spatial strategy as follows:</p> <ul style="list-style-type: none"> <li>• Winchester Town – about 5,640 dwellings;</li> <li>• South Hampshire Urban Areas – about 5,650 dwellings;</li> <li>• Market Towns and Rural Area – about 3,825 dwellings.</li> </ul> <p>6.38 Paragraph 9.23 relates to phasing and confirms that the Council's intention is to slow down the rate of delivery, it states "it is necessary to phase the greenfield allocations towards the latter parts of the Plan period so as to maintain a reasonable level of provision in these phases and prevent all housing provision from being built out in the early years of the Local Plan" (underlining is our emphasis). The Council accepts that we are in a housing crisis, and notes that the Standard Method is changing, and uses past completions to bolster its supply; so we are at a loss to understand why the Council wishes to slow down the supply of new homes? The phasing diagram on page 218 of the Local Plan, shown below, confirms that the delivery of homes would be expected to be faster if the Council did not interfere. This is a concern to us, and we ask that the phasing be reviewed to boost the supply of new homes urgently.</p> <p>See additional PDF.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policies and evidence base)</a> <a href="#">Letter (commenting on policies and evidence base - includes pictures and tables)</a> <a href="#">Supporting document 1 (Map of site - Land at Winchester Road)</a> <a href="#">Supporting document 2 (Briefing note - Winchester Settlement Gap)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/5/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H1 seeks to deliver a housing provision of around 15,115 dwellings between 2020-2040 through prioritising the approach of distributing development to a sustainable hierarchy of settlements. Within southern Hampshire the draft plan acknowledges there are several authorities that appear to be unable to meet their housing requirement, the PfSH has published a Spatial Position Statement to address these shortfalls. The partnership is taking a two stage approach which involves Winchester exceeding their requirement.</p> <p>Gladman support the use of an unmet needs allowance in aid of supporting its neighbouring authorities, and believe the plan is positively prepared. Nonetheless, the housing provision is based on the standard method from the adopted NPPF, and the emerging NPPF takes a stock-based approach to determine housing requirements. The proposed changes would increase the requirement to 1,099 dwellings per annum as opposed to the adopted requirement of 676 dwellings per annum.</p> <p>Gladman understands the emerging NPPF is not currently at the point of adoption, however, suggest sites in Policy H2 phased supply be brought forward to ensure the Council continues to meet their housing land supply targets.</p> <p>As the housing requirement is increased to reflect Winchester's neighbouring authorities, Gladman consider that the Council should identify and plan for additional housing supply (provision) above their housing need figure. At present the Council have identified enough housing provision to meet the housing need figure, however this is inclusive of an 1,895 dwelling contribution from windfall development.</p> <p>Windfall sites by definition are unidentified and while the Council has provided some evidence justifying the proposed allowance, there is a potential that such sites may not come forward, particularly if market signals and circumstances present viability issues. In addition, given the scale of strategic development and brownfield sites within the emerging Local Plan there is potential for delivery issues to occur (these are discussed further in relation to Policy H2).</p>



<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Supporting information (commenting on policies and proposed site)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Croudace Homes
<b>Personal reference number</b>	BHLF-AQTS-328A-Q
<b>Full reference number</b>	BHLF-AQTS-328A-Q/2/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Full response on website.</p> <p>Table H1 indicates that the housing requirement, as calculated using the standard method, is 13,565 homes over the plan period. It is disappointing that the council have not set out that this figure should be a minimum number of homes to be delivered over the plan period, as required by the current standard method set out in the NPPF. We therefore encourage the council to indicate this figure to be the minimum housing need to be ambitious to allocate a sufficient number and variety of sites to ensure that the Local Plan seek to support the Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Winchester district.</p> <p>It is pertinent to note that new standard method is proposed to use a baseline set at a percentage of existing housing stock levels, top up this baseline using a stronger affordability multiplier and remove arbitrary caps and additions so that the approach is driven by an objective assessment of need. The current housing requirement proposed in the Local Plan is not ambitious enough to achieve the Government's housing targets. The council should look to increase the housing requirement to ensure that it is appropriately and sufficiently planning for growth, in accordance with the Government's housing targets.</p> <p>The plan has not been positively prepared with only 18.6% of the housing provision over the plan period coming from existing commitments. We therefore urge the council to look at allocate further sites to boost and bolster the housing supply throughout the plan period. There is an over reliance on previously allocated sites, some of which have been built out and others which are complex brownfield sites which have not come forward in previous plan periods (namely Station Approach and the Central Winchester Regeneration Area</p>

formerly Silver Hill). Therefore, the deliverability of several of the allocated sites proposed to be carried over from the current Local Plan is questioned, particularly those which include the provision of older person and specialist homes which at present are mainly complex brownfield sites.

Further, there are three Neighbourhood Plan designated areas which are together proposed to provide 220 homes. The Denmead Neighbourhood Plan is currently being reviewed and a recent assessment of proposed sites has been undertaken, this has identified four suitable sites however these only equate to 27 homes and it is therefore questioned where the remaining 73 homes are to be found. The Alresford Neighbourhood Plan is at an early stage of preparation and the Hursley Neighbourhood Plan is at a very early stage, therefore it is questioned whether it is realistic to rely on all of these areas delivering the proposed 220 homes over the plan period. We would suggest that the Council review this to ensure that they are confident these homes will come forward through the respective Neighbourhood Plans in the plan period, and if not, further sites should be allocated elsewhere to ensure the required homes are delivered.

Provision is made for 1,900 homes in the Regulation 19 Plan to meet unmet needs, which is welcomed as the Regulation 18 Local Plan Consultation did not make provision for any unmet housing need to be accommodated. However, in the light of the new Government's ambitious housing targets, unmet need from neighbouring authorities could increase, for example Southampton's already unachievable housing need may increase by a further 15%, and therefore, in accordance with the PfSH Statement of Common Ground, further provision should be made to accommodate the resultant unmet need to ensure the plan is effective and meets the tests of soundness.

Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of these sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council needs to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement As set out in Section 4 of these representations, the wider site at land at Southwick Road provides a key opportunity to allocate further land in a highly accessible, sustainable location to deliver the required housing Winchester needs over the plan period.

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

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Stuart Crossen
<b>Personal reference number</b>	BHLF-AQTS-328V-C
<b>Full reference number</b>	BHLF-AQTS-328V-C/2/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>In part this policy replicates the provisions of Policy SP2, which we have objected to elsewhere in these representations. Those objections – focussed upon the distribution of housing between the three spatial planning areas – apply in relation to H1 (in essence, the distribution should have a greater focus upon Winchester Town).</p> <p>4.6 So far as the housing requirement, we object on the basis that this is expressed as an ‘about’ rather than being a ‘minimum’ to reflect the provisions of the NPPF and the national imperative to boost significantly the supply of housing.</p> <p>4.7 The housing requirement figure currently being planned for is 15,115 dwellings (505 less than the Regulation 18 figure). It is important that this does not fall below the standard method figure at the point of plan submission, allowing for the buffer as included in the policy which we would support. However, it is already apparent that the Standard Method will be modified and that this plan will fall significantly short of what is required in this area.</p> <p>4.8 So far as the approach to meeting the housing requirements, we object to the inclusion of outstanding planning permissions (1,091) and remaining local plan allocations (1753) without applying any deduction for non-implementation. Typically, we would expect to see a 20% deduction to provide for a robust approach, in this instance this would equate to a reduction from these two housing sources of 569 dwellings to be found from other sources, typically additional allocations.</p> <p>4.9 In terms of windfall, this is inevitably a finite resource. Windfall should be a buffer for development plans providing a safety net in case circumstances change and there is an increased demand for housing. The expected level of future windfall is not realistic and does not take account of how permitted development rights have influenced past windfall rates. The supply from this stream is likely to have been exhausted or certainly depleted at best and there are no known new permitted development right changes which could generate the same level of windfall housing. The Council should evidence the approach more fully, and as above apply a discount of 20% in recognition that if the plan does correctly identify and allocate development opportunities through a robust and proportionate evidence base the extent of windfall reduces, particularly</p>

	<p>given the approach this plan is presently taking to prioritising previously developed land and limiting development in the countryside. As a result, the windfall allowance should be reduced by 313 dwellings.</p> <p>19</p> <p>4.10</p> <p>The emerging plan only seeks to deliver at a rate of 757 dwellings per annum, significantly lower than might be required by the proposed method and more than the 200-threshold set out in the transitional arrangements which require even adopted plans which are less than 5 years old to begin the process of plan making.</p> <p>4.11 Taking these matters in the round, we consider that allocations should be increased by 6,865 dwellings to ensure the minimum 21,980 dwellings is met.</p> <p>4.12 In addition, the limitations we have identified with the supply mean that new allocations are required to increase by 882 which means a total of 7,747 additional houses are required to meet the needs of Winchester over the plan period.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/6/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates is broadly supportive of the housing requirements set out under Strategic Policy H1, including the provision of a buffer to accommodate the needs from the neighbouring authorities. However, it is not clear how this approach to identifying need complies with the guidance for calculating housing needs. The basis for calculating need is to use the submission year of the plan as the starting point and to calculate need and a trajectory forward over the plan period. Previous targets and delivery performance, under current policy and guidance is not necessarily relevant, other than to provide context.</p> <p>8.2 Winchester Strategic Housing Market Assessment Update ('SHMA') (published in July 2024) supports the case for the housing requirement, as set out in Policy H1, to be retained or potentially increased and the case for proposed allocations to be retained.</p> <p>8.3 The SHMA highlights that the housing delivery rates over the last five years have significantly exceeded the Local Plan average requirement of 625 dwellings per annum. However, it is also noted that while affordable housing delivery has significantly improved, there does not appear to have been an immediate, or significant, impact on improving market affordability in Winchester District.</p> <p>8.4 The need to maintain the housing delivery rates and increase the delivery of affordable housing is identified in the SHMA.</p> <p>8.5 The urgent need for housing is brought into sharp focus with Secretary of State's written ministerial statement entitled "Building the homes we need" ('WMS') which sets out the measures to address the housing crisis. It should also be noted that the WMS has material weight.</p> <p>8.6 At the time of drafting this representation, the Government has signalled its firm intention to revise the National Planning Policy Framework ('Framework') in relation to housing land supply and delivery and to this end the Government has published a draft revised Framework (dated 30th July 2024) which is subject to an eight week period of consultation up to 24th September.</p> <p>8.7 Part of the Government's proposed changes include the revisions to the way the housing need is calculated through the introduction of revisions to the Standard Method of calculating the need. If the proposed method for calculating housing need is implemented, as currently proposed, the annualised housing target for Winchester would increase from 676 dwellings per annum to 1099 dwellings per</p>

	<p>annum.</p> <p>8.8 At the heart of the draft guidance is the continued support for sustainable development in locations which are accessible and well served by social infrastructure. Moreover, the draft Framework signals the determination to boost deliverable housing land supply with a revised standard methodology for calculating housing need and a return to mandatory housing targets.</p> <p>8.9 The draft Framework shows the likely direction of travel for Government policy relating to development growth and infrastructure provision, application determination, and plan-making in England. If the revised standard method is adopted, this could result in significant uplift in the annualised housing requirement in Winchester District.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Given the growing mandate for the standard method to be used as the basis for determining local authorities' housing requirements in all circumstances, the Council must commit to an early review of the Local Plan to enable sufficient housing to come forward to meet local targets.</p> <p>8.11 There are sites, such as Land to the rear of Thody's, which could be allocated to provide a buffer to meet the expected rise in housing targets.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<p><b>Have you submitted supporting information?</b></p> <p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (commenting on policies and evidence base)</a></p>



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/6/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant Yes Positively prepared Yes</p> <p>Sound No Justified Yes</p> <p>Compliant with the duty to cooperate</p> <p>Yes</p> <p>Effective No</p> <p>Compliant with national policy No</p> <p>8.1 Wates is broadly supportive of the housing requirements set out under Strategic Policy H1, including the provision of a buffer to accommodate the needs from the neighbouring authorities. However, it is not clear how this approach to identifying need complies with the guidance for calculating housing needs. The basis for calculating need is to use the submission year of the plan as the starting point and to calculate need and a trajectory forward over the plan period. Previous targets and delivery performance, under current policy and guidance is not necessarily relevant, other than to provide context.</p> <p>8.2 Winchester Strategic Housing Market Assessment Update ('SHMA') (published in July 2024) supports the case for the housing requirement, as set out in Policy H1, to be retained or potentially increased and the case for proposed allocations to be retained.</p> <p>8.3 The SHMA highlights that the housing delivery rates over the last five years have significantly exceeded the Local Plan average requirement of 625 dwellings per annum. However, it is also noted that while affordable housing delivery has significantly improved, there does not appear to have been an immediate, or significant, impact on improving market affordability in Winchester District.</p> <p>8.4 The need to maintain the housing delivery rates and increase the delivery of affordable housing is identified in the SHMA. This reinforces the need for medium sized sites such as Land at Brightlands to be allocated in the emerging Local Plan as medium sized sites are typically delivered quickly and can offer affordable housing.</p> <p>8.5 The urgent need for housing is brought into sharp focus with Secretary of State's written ministerial</p>

	<p>statement entitled "Building the homes we need" ('WMS') which sets out the measures to address the housing crisis. It should also be noted that the WMS has material weight.</p> <p>8.6 At the time of drafting this representation, the Government has signalled its firm intention to revise the National Planning Policy Framework ('Framework') in relation to housing land supply and delivery and to this end the Government has published a draft revised Framework (dated 30th July 2024) which is was subject to an eight week period of consultation up to 24th September.</p> <p>8.7 Part of the Government's proposed changes include the revisions to the way the housing need is calculated through the introduction of revisions to the Standard Method of calculating the need. If the proposed method for calculating housing need is implemented, as currently proposed, the annualised housing target for Winchester would increase from 676 dwellings per annum to 1099 dwellings per annum.</p> <p>8.8 At the heart of the draft guidance is the continued support for sustainable development in locations which are accessible and well served by social infrastructure. Moreover, the draft Framework signals the determination to boost deliverable housing land supply with a revised standard methodology for calculating housing need and a return to mandatory housing targets.</p> <p>The draft Framework shows the likely direction of travel for Government policy relating to development growth and infrastructure provision, application determination, and plan-making in England. If the revised standard method is adopted, this could result in significant uplift in the annualised housing requirement in Winchester District.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Necessary modification to the Policy</p> <p>8.10 Given the growing mandate for the standard method to be used as the basis for determining local authorities' housing requirements in all circumstances, the Council must commit to an early review of the Local Plan to enable sufficient housing to come forward to meet local targets.</p> <p>8.11 There are sites, such as Land at Brightlands, which could have their allocated capacity increased to provide a buffer to meet the expected rise in housing targets. The site has capacity to deliver almost double its current allocation which would assist in meeting an increase in targets. .</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a></p>
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<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/6/H1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Legally compliant Yes  Positively prepared Yes  Sound No Justified Yes  Compliant with the duty to cooperate Yes  Effective No  Compliant with national policy No</p> <p>8.1 Wates is broadly supportive of the housing requirements set out under Strategic Policy H1, including the provision of a buffer to accommodate the needs from the neighbouring authorities. However, it is not clear how this approach to identifying need complies with the guidance for calculating housing needs. The basis for calculating need is to use the submission year of the plan as the starting point and to calculate need and a trajectory forward over the plan period. Previous targets and delivery performance, under current policy and guidance is not necessarily relevant, other than to provide context.</p> <p>8.2 Winchester Strategic Housing Market Assessment Update ('SHMA') (published in July 2024) supports the case for the housing requirement, as set out in Policy H1, to be retained or potentially increased and the case for proposed allocations to be retained.</p> <p>8.3 The SHMA highlights that the housing delivery rates over the last five years have significantly exceeded the Local Plan average requirement of 625 dwellings per annum. However, it is also noted that while affordable housing delivery has significantly improved, there does not appear to have been an immediate, or significant, impact on improving market affordability in Winchester District.</p> <p>8.4 The need to maintain the housing delivery rates and increase the delivery of affordable housing is identified in the SHMA.</p> <p>8.5 The urgent need for housing is brought into sharp focus with Secretary of State's written ministerial statement entitled "Building the homes we need" ('WMS') which sets out the measures to address the housing crisis. It should also be noted that the WMS has material weight.</p> <p>8.6 At the time of drafting this representation, the Government has signalled its firm intention to revise the National Planning Policy Framework ('Framework') in relation to housing land supply and delivery and</p>

	<p>to this end the Government has published a draft revised Framework (dated 30th July 2024) which is was subject to an eight week period of consultation up to 24th September.</p> <p>8.7 Part of the Government's proposed changes include the revisions to the way the housing need is calculated through the introduction of revisions to the Standard Method of calculating the need. If the proposed method for calculating housing need is implemented, as currently proposed, the annualised housing target for Winchester would increase from 676 dwellings per annum to 1099 dwellings per annum.</p> <p>8.8 At the heart of the draft guidance is the continued support for sustainable development in locations which are accessible and well served by social infrastructure. Moreover, the draft Framework signals the determination to boost deliverable housing land supply with a revised standard methodology for calculating housing need and a return to mandatory housing targets.</p> <p>8.9 The draft Framework shows the likely direction of travel for Government policy relating to development growth and infrastructure provision, application determination, and plan-making in England. If the revised standard method is adopted, this could result in significant uplift in the annualised housing requirement in Winchester District.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Given the growing mandate for the standard method to be used as the basis for determining local authorities' housing requirements in all circumstances, the Council must commit to an early review of the Local Plan to enable sufficient housing to come forward to meet local targets.</p> <p>8.11 There are sites, such as Land at Pudding Farm, which could be allocated to provide a buffer to meet the expected rise in housing targets.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies)</a></p>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Patrick Blake
<b>Personal reference number</b>	BHLF-AQTS-32QF-N - National Highways
<b>Full reference number</b>	BHLF-AQTS-32QF-N - National Highways/1/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	We have reviewed the various housing policies H1-H18 as well as the subsequent housing allocation policies and note that there are none which are directly adjacent to the SRN. However, should unallocated development come forwards which could directly or indirectly impact the SRN we strongly recommend early engagement with National Highways.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Ibex Homes Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QE-M
<b>Full reference number</b>	BHLF-AQTS-32QE-M/2/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H1 – Housing Provision</p> <p>OBJECT – UNSOUND – Not positively prepared, justified or consistent with national policy</p> <p>2.7 The importance of significantly boosting the supply of housing nationally cannot be underestimated as a core Government objective running to the heart of the planning system. In fact, the new Labour Government’s recent consultation that ran between July – September 2024 on the proposed reforms to the planning system incorporated a series of measures designed to deliver this objective over the course of the parliamentary term.</p> <p>2.8 It is therefore of serious concern that WCC has chosen to rush the publication of its Regulation 19 consultation with the express intention of trying to avoid the impact of the Government’s proposed changes to the Framework 2023. This express intention was explicitly set out by Officers and endorsed by Members of the Council, at their meeting on 28 August 2024.</p> <p>2.9 The Council approach is deliberately intended to ‘kick the can down the road’ in terms of meeting its full and up-to-date calculation of Local Housing Need (“LHN”), which when calculated via the Government’s proposed changes to the Standard Method would lead to an increase from 676 dpa to 1,099 dpa (an uplift of 423 dpa or 62.6%).</p> <p>2.10 The Council’s approach does not represent positive or proactive planning. By seeking to take advantage of the proposed transitional arrangements the Council is delaying the delivery of much needed new homes (both open market and affordable homes). The proposed changes to the Framework 2023 clearly confirm that in circumstances where a Council adopts a Local Plan with a housing requirement that is more than 200 dpa below the new Standard Method calculation of LHN (as is the intention of the Council here) then it will be required to undertake a review at the ‘earliest opportunity’. Not only is the Council seeking to delay the delivery of much needed new homes, but it will also put itself to the time and cost of bringing forward two Local Plans back-to-back. That is not effective or efficient planning.</p> <p>2.12 Ibex are of the opinion that the Council has failed to plan for sufficient housing and in doing so, should reconsider the plans housing requirement. It is therefore vital that this Plan seeks to deliver the correct level of new homes over the Plan period in order to avoid an exponential worsening of affordability.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on letter and proposed site)</a>  <a href="#">Supporting information (Location Plan)</a></p>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/2/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Strategic Policy H1 – Housing Provision OBJECT – UNSOUND – Not positively prepared, justified or consistent with national policy. The importance of significantly boosting the supply of housing nationally cannot be underestimated as a core Government objective running to the heart of the planning system. Set within this context the delivery of the right level of new housing across the District within the Plan is key to its Soundness, particularly in terms of planning positively, being consistent with national policy and being effective. It is therefore of serious concern that WCC has chosen to rush the publication of its Regulation 19 consultation with the express intention of trying to avoid the impact of the Government’s proposed changes to the Framework 2023. The Council approach is deliberately intended to ‘kick the can down the road’ in terms of meeting its full and up-to-date calculation of Local Housing Need (“LHN”), which when calculated via the Government’s proposed changes to the Standard Method would lead to an increase from 676 dpa to 1,099 dpa (an uplift of 423 dpa or 62.6%).</p> <p>This is a massive uplift that is directly reflective of the significant and, currently unmet, need in Winchester District. The Council’s approach does not represent positive or proactive planning. Not only is the Council seeking to delay the delivery of much needed new homes, but it will also put itself to the time and cost of bringing forward two Local Plans back-to-back. That is not effective or efficient planning.</p> <p>The LHN figure of 676 dpa comprises the right starting point for the Plan. The PPG confirms that the Standard Method comprises the minimum starting point. There can be circumstances where the LHN should be set higher than that calculated via the Standard Method, which may include meeting unmet need arising from a neighbouring authority or addressing a particular affordability issue. There are three key reasons why the Council should be planning for a higher figure than the minimum LHN calculated via the Standard Method.</p>

Reason 1 – The new Labour Government’s proposed reforms to the planning system are due to be published in final form at the end of 2024. Part of the reforms comprise the new Standard Method calculation of LHN. For Winchester this would mean a significant uplift in the minimum LHN. The Council has an opportunity now to plan proactively for the future of the district and to ensure that, at the very least, the minimum housing requirement set within this Plan is no more than 200 dpa below the new LHN of 1,099 dpa. That would enable the Council to adopt the Plan without the need to undertake an immediate review and thereby to provide certainty and stability for future development management decisions.

Reason 2 – The Housing Topic Paper confirms that the current need (as at 2024) for affordable/social rented housing is 368 dpa, which is an increase of 25 dpa from when the last assessment was undertaken in 2020. Furthermore, the need for affordable home ownership has increased to 142 dpa (up by 19 dpa)<sup>2</sup>. The level of affordable housing need equates to 75.4% of the total minimum LHN of 676 dpa, which is substantial. The Council has concluded that no adjustment should be made to its LHN to take account of the worsening affordable housing need. There is a clear and present need for affordable homes in Winchester District and the level of need identified in the SHMA update 2024 is significant and requires an adjustment to be made to the minimum LHN to help meet some of the shortfall.

Reason 3 – There are unmet needs arising from a number of neighbouring authorities within the PfSH area in particular. The Council proposes to provide a total of 1,900 dwellings in addition to the minimum LHN in order to help meet these unmet needs. It is clear that not all of the unmet needs are fully quantified within the PfSH area nor within the other areas immediately surrounding the district. That said, the Council does not appear to have interrogated these matters to determine whether and to what extent unmet needs could be identified at this stage and, in turn, catered for as part of the preparation of this Plan. One point that is clear is the fact that 1,900 dwellings does not fully reflect the unmet need arising even as identified by the Council through its Topic Paper. For example, Portsmouth alone has an unmet need of 3,577 dwellings. Whilst Harding Holding is supportive of the inclusion of 1,900 dwellings of unmet need this should be regarded as the absolute minimum and certainly not a figure that addresses all unmet need arising. The position will be materially worse once the new Standard Method calculation of LHN is brought forward.

The only way to address the above three points is to plan for more housing at a level above the LHN calculated using the current Standard Method. The answer as to how much additional housing to plan for is one that the Council needs to explore particularly in the light of the unmet need situation. Before setting out Harding Holding’s view on the minimum housing requirement it is necessary to consider one further problem with the Council’s approach.

	<p>The Council states that the Plan period should remain with a starting date of 2020 to allow for some of the Council's recent good performance in terms of housing completions to be taken into account, as there are no specific provisions in the Framework or PPG for past over-supply to be considered. This approach is fundamentally flawed and does not reflect national policy set out in the Framework 2023 nor the PPG. In addition, the Council is wrong in its suggestion that there are no specific provisions in the Framework or PPG. The current Standard Method calculation of LHN takes account of past delivery in the form of updates to the affordability ratio component of the calculation. Table H1 of the draft Plan confirms this by showing that the Standard Method calculation of LHN has reduced in the last 3 monitoring years as a direct reflection of past over delivery. The PPG is clear that the LHN should be updated to reflect the latest data where appropriate and that it is then fixed for a period of 2 years from the date of the submission of the Plan to the Planning Inspectorate for examination. The only sound approach to take is to rebase the Plan to 2024 taking account of the most recent Standard Method calculation of LHN and applying a 20-year plan period through to 2044.</p> <p>Taking all of the above into account it is clear that the Council must plan for a higher figure than the minimum LHN. Taking the minimum LHN of 676 dpa as the starting point there is a sound argument for increasing this to reflect the worsening affordable housing need in the district along with addressing the situation that will arise when the new Standard Method calculation of LHN comes into place at the end of 2024. In addition to this the unmet need arising from surrounding authorities needs to be revisited because 1,900 dwellings proposed by the Council is nowhere near the actual need arising. In harding Holding's view the Housing Requirement should be set at the following level as a minimum: see PDF for additional information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies and evidence base)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting information \(Map\)](#)

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Croudace Homes (Alison Walker)
<b>Personal reference number</b>	BHLF-AQTS-32QZ-9
<b>Full reference number</b>	BHLF-AQTS-32QZ-9/2/H1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Strategic Policy H1 – Housing Provision OBJECT – UNSOUND – Not positively prepared, justified or consistent with national policy. The importance of significantly boosting the supply of housing nationally cannot be underestimated as a core Government objective running to the heart of the planning system. Set within this context the delivery of the right level of new housing across the District within the Plan is key to its Soundness, particularly in terms of planning positively, being consistent with national policy and being effective. It is therefore of serious concern that WCC has chosen to rush the publication of its Regulation 19 consultation with the express intention of trying to avoid the impact of the Government’s proposed changes to the Framework 2023. The Council approach is deliberately intended to ‘kick the can down the road’ in terms of meeting its full and up-to-date calculation of Local Housing Need (“LHN”), which when calculated via the Government’s proposed changes to the Standard Method would lead to an increase from 676 dpa to 1,099 dpa (an uplift of 423 dpa or 62.6%).</p> <p>This is a massive uplift that is directly reflective of the significant and, currently unmet, need in Winchester District. The Council’s approach does not represent positive or proactive planning. Not only is the Council seeking to delay the delivery of much needed new homes, but it will also put itself to the time and cost of bringing forward two Local Plans back-to-back. That is not effective or efficient planning.</p> <p>The LHN figure of 676 dpa comprises the right starting point for the Plan. The PPG confirms that the Standard Method comprises the minimum starting point. There can be circumstances where the LHN should be set higher than that calculated via the Standard Method, which may include meeting unmet need arising from a neighbouring authority or addressing a particular affordability issue. There are three key reasons why the Council should be planning for a higher figure than the minimum LHN calculated via the Standard Method.</p>

Reason 1 – The new Labour Government’s proposed reforms to the planning system are due to be published in final form at the end of 2024. Part of the reforms comprise the new Standard Method calculation of LHN. For Winchester this would mean a significant uplift in the minimum LHN. The Council has an opportunity now to plan proactively for the future of the district and to ensure that, at the very least, the minimum housing requirement set within this Plan is no more than 200 dpa below the new LHN of 1,099 dpa. That would enable the Council to adopt the Plan without the need to undertake an immediate review and thereby to provide certainty and stability for future development management decisions.

Reason 2 – The Housing Topic Paper confirms that the current need (as at 2024) for affordable/social rented housing is 368 dpa, which is an increase of 25 dpa from when the last assessment was undertaken in 2020. Furthermore, the need for affordable home ownership has increased to 142 dpa (up by 19 dpa)<sup>2</sup>. The level of affordable housing need equates to 75.4% of the total minimum LHN of 676 dpa, which is substantial. The Council has concluded that no adjustment should be made to its LHN to take account of the worsening affordable housing need. There is a clear and present need for affordable homes in Winchester District and the level of need identified in the SHMA update 2024 is significant and requires an adjustment to be made to the minimum LHN to help meet some of the shortfall.

Reason 3 – There are unmet needs arising from a number of neighbouring authorities within the PfSH area in particular. The Council proposes to provide a total of 1,900 dwellings in addition to the minimum LHN in order to help meet these unmet needs. It is clear that not all of the unmet needs are fully quantified within the PfSH area nor within the other areas immediately surrounding the district. That said, the Council does not appear to have interrogated these matters to determine whether and to what extent unmet needs could be identified at this stage and, in turn, catered for as part of the preparation of this Plan. One point that is clear is the fact that 1,900 dwellings does not fully reflect the unmet need arising even as identified by the Council through its Topic Paper. For example, Portsmouth alone has an unmet need of 3,577 dwellings. Whilst Croudace is supportive of the inclusion of 1,900 dwellings of unmet need this should be regarded as the absolute minimum and certainly not a figure that addresses all unmet need arising. The position will be materially worse once the new Standard Method calculation of LHN is brought forward.

The only way to address the above three points is to plan for more housing at a level above the LHN calculated using the current Standard Method. The answer as to how much additional housing to plan for is one that the Council needs to explore particularly in the light of the unmet need situation. Before setting out Croudace’s view on the minimum housing requirement it is necessary to consider one further problem with the Council’s approach.



	<p>The Council states that the Plan period should remain with a starting date of 2020 to allow for some of the Council's recent good performance in terms of housing completions to be taken into account, as there are no specific provisions in the Framework or PPG for past over-supply to be considered. This approach is fundamentally flawed and does not reflect national policy set out in the Framework 2023 nor the PPG. In addition, the Council is wrong in its suggestion that there are no specific provisions in the Framework or PPG. The current Standard Method calculation of LHN takes account of past delivery in the form of updates to the affordability ratio component of the calculation. Table H1 of the draft Plan confirms this by showing that the Standard Method calculation of LHN has reduced in the last 3 monitoring years as a direct reflection of past over delivery. The PPG is clear that the LHN should be updated to reflect the latest data where appropriate and that it is then fixed for a period of 2 years from the date of the submission of the Plan to the Planning Inspectorate for examination. The only sound approach to take is to rebase the Plan to 2024 taking account of the most recent Standard Method calculation of LHN and applying a 20-year plan period through to 2044.</p> <p>Taking all of the above into account it is clear that the Council must plan for a higher figure than the minimum LHN. Taking the minimum LHN of 676 dpa as the starting point there is a sound argument for increasing this to reflect the worsening affordable housing need in the district along with addressing the situation that will arise when the new Standard Method calculation of LHN comes into place at the end of 2024. In addition to this the unmet need arising from surrounding authorities needs to be revisited because 1,900 dwellings proposed by the Council is nowhere near the actual need arising. In Croudace's view the Housing Requirement should be set at the following level as a minimum: see PDF for additional information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on policies and evidence base)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 1 \(Vision Document\)](#)

[Supporting document 2 \(Map - Land east of Highbridge Road, Colden Common\)](#)

[Supporting document 3 \(Indicative layout\)](#)

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Hannah Young
<b>Personal reference number</b>	BHLF-AQTS-32QC-J
<b>Full reference number</b>	BHLF-AQTS-32QC-J/1/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Winchester District's housing need for the plan period 2020-40 is 13,565 dwellings in line with the Standard Method calculation of Annual Need (Local Plan Table H1).</p> <p>2.4.2 This consultation Plan is seeking to meet this housing need in full. Recognising that a number of authorities in the southern Hampshire region appear unable to meet their Standard Method housing need in full, in the "spirit of cooperation required by government policy", WCC is looking to provide an additional unmet needs allocation of 1,900 dwellings.</p> <p>2.4.3 This provides a total District Housing Requirement of 15,465 dwellings. This includes an estimated 350 dwellings within the South Downs National Park.</p> <p>2.4.4 The remaining requirement for the Local Plan area (excluding the estimated 350 in the South Downs National Park part of the district), including the allowance for unmet need from neighbouring authorities, is 15,115 dwellings. Some 64% of the district requirement is met by dwellings that have either been completed or which already have planning permission. A further 12% are expected from windfall development over the Plan period. Less than 25% of provision is from Local Plan allocations (either carried forward or new). In WCC's view this gives a high level of certainty to delivery.</p> <p>2.4.5 The Council has therefore not included a buffer to allow for non-delivery, especially given, in its view, the high levels of housing provision expected in the early years of the Plan period. It considers any shortfall in housing delivery can be made up through adjustments to phasing provisions at the Plan is updated/ reviewed every 5 years.</p> <p>2.4.6 We note the Council's current stated housing land supply position is over 7 years (AMR, 2022-23); with substantially more than 5 years' supply for both the 2023-2028 and 2024-2029 monitoring periods. Eastleigh, an adjoining authority to the west (and one with a direct relationship to the Site at Botley Railway Station) has</p>

	<p>a stated housing supply of 5.1 years (August 2022).</p> <p>2.4.7 It is noted that the Government is proposing changes to the Standard Method in its revised NPPF, and if this comes into force, Winchester’s annual housing need will increase by 62% from 676 to 1,099 dwellings per annum. Given the current plan is more than 200 dwellings per annum under this threshold, if WCC has not submitted its Plan to the Secretary of State for examination ahead of the publication of the NPPF it will need to produce a replacement Reg. 19 Local Plan to accord with the new policies in the Framework and the new Standard Method before proceeding.</p> <p>2.4.8 Even if WCC submits its Plan by this deadline, it will be required to commit to a Review of the Plan at the “earliest opportunity”.</p> <p>There are three strategic sites being delivered within the District, and the Council is relying heavily on their continued delivery to meet the district’s housing need as part of the New Local Plan. These sites are Waterlooville, North Whiteley and Barton Farm. WCC’s Annual Monitoring Report (AMR) 2022-23 confirms (para. 3.1.46) that completions across the three strategic sites are now reaching their peak. It is noted that market conditions resulted in lower levels of provision in the first part of the Local Plan period, but the trajectory was updated in the Local Plan Part 2 to provide a more realistic basis for future monitoring.</p> <p>3.1.33 The AMR indicates that in 2022/23 74 dwellings were completed at Bartons Farm, 348 dwellings at North Whiteley. It is accepted that once strategic sites begin mobilisation they can deliver more quickly so the above assumptions on the face of it are not unreasonable. Saying that, anticipating a steady trajectory as proposed is misguided as global and national matters can disrupt housing provision as we have seen with the Covid 19 Pandemic, rising interest rates, rising construction costs etc. The fact the Council is relying on this growth we would suggest that more conservative delivery rates are applied; particularly as the rates anticipated have not yet been achieved.</p> <p>see PDF for additional information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (commenting on policies and proposed site)</a> <a href="#">Supporting document 2 (site deliverability statement)</a>

<b>Policy/Evidence base document</b>	H1
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/42/H1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>It should be made clear in Policy H1 that the housing figures minimum targets and a starting point. The NPPG is clear that the standard methodology set out provides a “minimum” figure of housing need. This particularly applies in respect of the need to contribute to meeting the Partnership for South Hampshire strategy. Policy H1 is unsound on the basis that it fails to plan positively to fully meet the evidenced scale of local housing need – in particular the unmet needs arising in South Hampshire. The duty to co-operate is a legal duty on local planning authorities. In a Written Ministerial Statement dated 30 July 2024, the new Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government confirmed the continued operation of the duty to cooperate. As per paragraphs 11b) and 27 of the current version of the NPPF, December 2023, strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through statements of common ground). In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. Assuming the forthcoming introduction of the new standard method these already high levels of unmet need are to set to increase substantially.</p> <p>Examining the Local Plan housing trajectory, it becomes evident that the overall trend for housing provision in the Winchester district is downward. 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. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed it is crucial to include additional allocations in this plan that would support and sustain higher levels of housing completions. The current housing requirement has decreased from the Regulation 18 stage, where</p>

the minimum requirement was set at 736 dwellings annually, totalling 14,178. Previously a buffer for standard method changes and to help contribute to the PfSH shortfall had been allowed for in the total housing need figure, there is no longer any reference to the former. Given that the standard method serves as a starting point and the proposed housing requirement for Winchester under the proposed standard method (consultation now closed) is 1,099, the proposed decrease since Regulation 18 to 13,565 does not provide a sound or robust foundation for the local plan.

While the PfSH position statement predates the updated NPPF consultation and the new standard method, there is a clear expectation for flexibility in the preferred spatial approach, which can be adjusted to accommodate the outcome of the Government consultation. In this regard, the proposed standard method local housing needs, would give rises to significant increase in housing required for adjacent PfSH authorities. There is a lack of evidence regarding how the unmet need figure was calculated but the current allowance falls significantly short of what is necessary to support a sound local plan. The plan should proactively seek to address the unmet housing needs by establishing a higher housing target, which reflects the positive opportunities and capacity within the district. It should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. This should include expanding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) to include site WI06, increasing the total number of units from 40 to around 100. This proposed expansion is justified, considering the district's capacity to address the (growing) unmet needs within the Partnership for South Hampshire (PfSH) area as part of its duty to cooperate, while also allowing greater flexibility in the event of any non-delivery on existing allocated sites. This approach would ensure that the policy is positively prepared and remains effective over its period. The PfSH Spatial Position Statement (December 2023) shows there is a shortfall of just under 11,800 homes across the South Hampshire sub region which is likely to increase between 35,000 to 40,000 should the proposed amendments to the NPPF and Standard Method be adopted.

Bloor Homes contests the Council's decision to establish a plan period beginning in 2020, which precedes the submission of the local plan for examination by over four years. The Council's approach fundamentally misinterprets the standard method, which incorporates past supply via an affordability uplift to determine future housing needs. The increase in housing delivery, to a degree, takes into account past over supply in that it will have increased supply in the market, thereby potentially limiting increases in housing prices in Winchester and lessening the assessed housing need determined under the standard method. Local plans are meant to look forward at what needs to be delivered with past delivery being taken into account through the standard method. Commencing the plan period in 2020 is neither logical nor consistent with national policy; it should instead begin in 2024, the year in which the assessment was calculated and also to allow for delays to adoption.

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	<p>No, I don't agree</p>
<p><b>If no, please explain</b></p>	<p>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</p>
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>



**WCC Response.**

The keys issues raised in representations on Policy H1 have been addressed in the Housing Topic Paper, July 2024 (SD10g) and the Housing Topic Paper Update, January 2025 (ED02), as follows:

- Revised NPPF – ED02 Chapter 2;
- The Local Plan Period – SD10g Chapter 2, ED02 Chapter 3;
- Standard Method / Housing Requirement – SD10g Chapter 3;
- Duty to Cooperate / Unmet Needs Allowance – SD10g Chapter 4, ED02 Chapter 4;
- Trajectory / Phasing / Housing Supply – SD10g Chapters 5 & 6, ED02 Chapters 5 & 6

Updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council have been agreed and published (October 2024) – SD08e and SD08i.

**WCC Recommended Changes arising from representations:**

- Additional explanatory text to refer to a review of the Local Plan (PM2) and changes to Policy SP2 to commit to this review in policy (PM3).
- Changes to Local Plan Table 2 to reflect the approach agreed in the updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council (PM60).
- A minor change to Policy H1 will be needed to correct a previous error in calculating housing supply (see ED02 paragraph 5.24). This is not a proposed modification at this stage, in case other changes are needed following the Local Plan examination.

Local Plan Reference or document	Policy H2 Housing Phasing and Supply	
Total Number of Representations received	48	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	14	26
Sound	2	43
Complies with Duty to Cooperate	15	24
<p><b>Summary of Representations</b></p> <p>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.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>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  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/29/H2</b>  ANON-AQTS-32GC-8/6/H2  ANON-AQTS-3299-G/11/H2  ANON-AQTS-32GG-C/6/H2</p>		

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

**Main issues raised in representations received in regulation 19 consultation**

- 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.

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/50/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The current plan meets the current requirements well.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Sue Wood
<b>Personal reference number</b>	ANON-AQTS-3B4C-5
<b>Full reference number</b>	ANON-AQTS-3B4C-5/3/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	no comment
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	no comment
<b>What is your suggested wording or text for the policy?</b>	no comment
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Merlin Homes
<b>Personal reference number</b>	ANON-AQTS-3B8W-W
<b>Full reference number</b>	ANON-AQTS-3B8W-W/2/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H2 – Housing Phasing &amp; Supply</p> <p>We note policy H2 states that phasing will be applied to new greenfield sites to hold them back for development until the later parts of the plan period and to prioritise the development of brownfield land first. It lists sites that will not be permitted for development before 2030 unless needed to remedy a land supply shortfall. It includes 100 dwellings at Denmead (DEN 1)</p> <p>Objection</p> <p>We object to this phasing policy because it will unnecessarily restrict housing delivery of greenfield sites for at least 5 years leaving allocations unimplemented in a local plan already undergoing or about to commence review. Where parish councils choose to review their own Neighbourhood Plan and to ensure conformity with the local plan, Neighbourhood plans can also be expected to be reviewed at around the same 5 year stage. The policy consequences could therefore be that allocations in current Neighbourhood Plans remain undeveloped before new allocations are selected in a future review as well. The policy will simply frustrate housing delivery.</p> <p>Paragraph 60 of the NPPF states that it is important that a sufficient amount and variety of land can come forward where it is needed and that land with permission is developed without unnecessary delay. The phasing restrictions in H2 deliberately prevents a variety of sites coming forward contrary to national policy. Some of the greenfield sites can also be expected to be less than 1 ha but the policy would frustrate the delivery of these sites too, contrary to paragraph 70 of the NPPF. Lastly, settlements with less brownfield and windfall opportunities to rely on would also face a hiatus in housing delivery for much of the plan period and prevent them from contributing to local need.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The sites listed for development post April 2030 including DEN1 – Denmead Neighbourhood Plan (100 dwellings) should therefore all be removed from the policy or the policy simply deleted from the local plan in its entirety.

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Mr & Mrs Painter
<b>Personal reference number</b>	ANON-AQTS-3272-7
<b>Full reference number</b>	ANON-AQTS-3272-7/2/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>3. Housing need and target 3.1 Policy SP H1 sets out a housing target of 15,115 for the district. This is based on:</p> <ul style="list-style-type: none"> <li>• a Standard Method calculation for a 20 year period stretching from 2020 to 2040 giving 13,563 dwellings</li> <li>• Assignment of 350 dwellings to the South Down National Park</li> <li>• Addition of 1900 homes to meet unmet needs in other areas</li> </ul> <p>3.2 The Council's use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years.</p> <p>3.3 On 30 July 2024 the Government published a Written Ministerial Statement and draft Standard Method and NPPF. These documents indicate a clear directions of travel in terms of national planning policy in relation to meeting housing needs. Paragraph 4 of the NPPF consultation document states that the government is "proposing a revised standard method which aligns more closely with the Government's aspirations for the housing market." In late September the Minister for Housing and Planning Matthew Pennycook warned Councils that he will intervene if councils produce plans with housing targets 'way under' their needs. The consultation on the new standard method and revised NPPF recently concluded and it is currently expected that an updated SM and NPPF will be published either toward the end of this year, or early next.</p> <p>3.4 Although the proposed revised Standard Method and NPPF are still at the consultation stage, and thus subject to potential change, the direction of travel is clear and recent appeal decisions have afforded some weight to it.</p> <p>3.5 The Government has helpfully published tables showing what the councils new housing need figures would be if the proposed Standard Methodology were used. In Winchester's case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, a difference of 423 and almost two thirds more than the existing. Applying this new Standard Method figure to the current plan period would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan.</p> <p>3.6 The Council would need to give consideration as to how much of Winchester's requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. However, even if the unmet needs commitment were dropped and a much higher figure</p>

	<p>were assigned to the National Park to deliver, Winchester’s housing requirement is still likely to significantly increase. 3.7 The Government has indicated that Councils with a “significant gap of over 200 dwellings per annum between the local planning authority’s revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF (Chapter 12, para 7). On the basis of the figures outlined above, this need to review the plan before submission would apply to Winchester. 3.8 In light of all of the above, it is submitted that the Council should take account of the Government’s new direction of travel and take time to carefully consider whether it should progress to submission, or instead return to an early stage of plan-making to revise its plan in accordance with the new NPPF before re-submitting. 3.9 In this context, the Council will need to keep an open mind regarding the supply of sites that it can draw upon to meet potentially higher housing numbers. This is addressed in the following section. 4. Sources of housing supply 4.1 Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized sites forward. 4.2 As noted in Section 2 it is considered that the Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Bishops Waltham. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. 4.3 There are medium sized sites available in these sustainable locations such as Bishops Waltham that could be brought forward quickly in a sensitive manner to help not only with housing delivery, but also re-enforce the vitality of the settlements and further the creation of quality places. One of these sites is the Land to the South of Tangier Gardens in Bishops Waltham. The non inclusion of this site as an allocation in the emerging plan is considered a flaw and unjustified. This, and other concerns, with the Bishop Waltham allocations are considered in more detail below.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting Document (commenting on policies)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/4/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy H2 proposes a phased trajectory for greenfield allocations, whereby the development of 795 dwellings on 12 greenfield site allocation is restricted until the later half of the plan period. Paragraph 9.23 explains this is to maintain a reasonable level of provision in these phases and prevent all housing provision being built out in the early years of the plan.</p> <p>The plan conflicts with paragraph 75 of the NPPF as it is unsupported by any detailed trajectory on housing delivery over the period to 2040 and associated evidence to justify that the brownfield sites and quantum would be developable in the first half of the plan period. Paragraph 9.24 of the plan rightly acknowledges that Brownfield sites often have a long lead in time in terms of delivery. The development of brownfield sites is generally complex, with greater constraints including demolition, site contamination and remediation for example. This therefore conflicts with the approach in H2 to phase these towards the earlier parts of the plan period.</p> <p>The proposed approach is wholly inconsistent with the Government's objective to significantly boost the supply of housing and with NPPF paragraph 60 which requires that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Restricting new development in the first half of the plan period to those existing allocations and brownfield sites prevents an even distribution of growth across the district and does not allow for a range and choice of available, suitable and deliverable sites to come forward in line with paragraph 69 of the NPPF.</p> <p>The Written Ministerial Statement of July 2024 confirms the existence of acute housing needs and a national crisis of housing, which must be addressed now. The phased approach in H2 has not been positively prepared to align with Government's clear direction of travel to increase the delivery of homes. There should not be barriers placed on the delivery of housing on sites that are immediately available, suitable and can be built out quickly.</p> <p>The Plan should encourage the delivery of brownfield sites whilst not artificially restricting the delivery of available and suitable greenfield sites, which are capable of delivering homes, including affordable homes, immediately and in greater numbers.</p>

<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The phased housing trajectory is not justified or positively planned to achieve sustainable development.
<b>What is your suggested wording or text for the policy?</b>	The phased housing trajectory is not justified or positively planned to achieve sustainable development.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a> <a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a> <a href="#">Supporting document 2 (Location Plan)</a> <a href="#">Supporting document 3 (Concept Plan)</a> <a href="#">Supporting document 4 (Illustrative masterplan)</a> <a href="#">Supporting document 5 (Access and Transport Report)</a> <a href="#">Supporting document 6 (Landscape and visual study)</a> <a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a> <a href="#">Supporting document 8 (Interim Ecology Assessment)</a> <a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a> <a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a> <a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a> <a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Peter Nicholas Homes
<b>Personal reference number</b>	ANON-AQTS-3292-9
<b>Full reference number</b>	ANON-AQTS-3292-9/2/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Although Denmead is considered a sustainable location for accommodating growth it has been limited by Policies H2 and DEN1 to 100 new dwellings in the plan period. The housing is expected to be delivered through the Neighbourhood Plan process and phased to the latter part of the Plan period – i.e. after 2030. It is not clear why Denmead’s potential future growth has been so constrained, especially when there are sustainable sites on the edge of the village that could be brought forward in the plan period without compromising openness and closing the gap between Denmead and Waterlooville. The current approach reads as a lack of commitment to deliver future sustainable growth. The settlement is capable of accommodating additional new housing development post 2024 in a sensitive and sustainable way.</p> <p>The Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Denmead. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. There are medium and strategic sized sites available in Denmead that could be brought in a sensitive manner to help not only with housing delivery, but also to re-inforce the vitality of the settlement and further the creation of quality places. These sites include Furzeley Golf Course /Denmead Driving Range and Furzehill Farm. The scale of the development would be such that it would facilitate a holistic masterplanning approach and sustainable place making, rather than an on-going process of piecemeal development in the settlement.</p> <p>In order to make the Plan sound Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030</p>
<b>What modification(s) are necessary to make the</b>	In order to make the Plan sound Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030

<b>policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Commenting on policies and policies map)</a> <a href="#">Supporting document 2 (Vision document - Furzeley Village, Denmead)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/5/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>BSP do not support the phasing of housing delivery throughout the plan period, for the reasons outlined in our response to Policy H1: the need is now and there is no justification to delay delivery of housing on sustainable sites.</p> <p>The draft policy wording currently states that ‘phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory.’ However, there is no support for this approach in the NPPF and in the context of the need to boost land supply.</p> <p>The NPPF paragraph 82d) states that ‘planning policies should (be)...flexible enough to accommodate needs not anticipated in the plan’. Equally, NPPF paragraph 11 highlights that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.’ Accordingly, the introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This policy should be deleted.
<b>What is your suggested wording or text for the policy?</b>	Removal of this policy.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	



<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B54-Q
<b>Full reference number</b>	ANON-AQTS-3B54-Q/3/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>BSP do not support the phasing of housing delivery throughout the plan period,,: the need for homes is now, the affordability challenge is acutely apparent now, and there is no justification to delay delivery of housing on sustainable sites.</p> <p>The draft policy wording currently states that ‘phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory.’ However, there is no support for this approach in the NPPF and in the context of the need to boost land supply.</p> <p>The NPPF paragraph 82d) states that ‘planning policies should (be)...flexible enough to accommodate needs not anticipated in the plan’. Equally, NPPF paragraph 11 highlights that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.’ Accordingly, the introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This policy should be deleted
<b>What is your suggested wording or text for the policy?</b>	Removal of this policy.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/29/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Refer to comments made under policy SP2 and H1.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/6/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Draft Policy H2 introduces the notion of phased development, whereby the priority is on the development of previously developed land and holding back the majority of greenfield allocated sites until the later parts of the plan period. Furthermore, the Policy specifies that sites will not be permitted to come forward ahead of their specified phasing unless they are required to contribute to the District's Five Year Housing Land Supply. This approach is questionable for a number of reasons.</p> <p>Firstly, this is contrary to the paragraph 60 of the NPPF which states:          "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".</p> <p>The NPPF is clear that a sufficient amount and variety of land can come forward where it is needed and a corollary of this is that where sites are needed they should be delivered without unnecessary delay. However, the draft Plan seeks to hold back a number of sites until later in the Plan period, for no justifiable reason other than the intention to prioritise brownfield development. Given that some greenfield sites have been allocated, it makes no sense to hold back the development of those allocated sites. Indeed, draft Policy H2 lists the sites which will be held back until 2030 equating to 795 dwellings.</p> <p>Whilst the NPPF supports the redevelopment of previously developed land, the Framework does not refer to a brownfield-first approach. Therefore, the approach proposed in the Draft Local Plan has no apparent basis in national planning policies. Noting this and taking account of the conflict with NPPF paragraph 60, the Council's approach fails as a matter of principle.</p> <p>Moreover, it is unclear why allocations on previously developed land should be expected to come forward more easily and quickly than those on greenfield sites. Indeed, the approach appears counterintuitive, noting that brownfield sites are often already occupied for a non-residential existing use or may otherwise be subject to complexities, constraints, such as contamination and viability concerns. Indeed, as documented in our representation on Policy H1, the rolled-over allocations include previously developed sites that have been allocated for over a decade but have not come forward for residential redevelopment.</p>

	<p>Secondly, it is likely that WCC will be dependent on greenfield sites. Lichfield's 'Start to Finish' document (3rd edition) provides the principal industry-based research into the factors which affect housing delivery. The research paper indicates that several issues arise from reliance upon large-scale, brownfield development sites.</p> <p>The research indicates lead-in times for development proposals comprising greater than 500 units are likely to be considerably lengthier than those for proposals below the 500-unit threshold. Average lead-in times for sites above the threshold were 4.3-years, whereas for smaller sites the average was just 2-years.</p> <p>The research further indicates that actual build-out rates were considerably lower on brownfield development sites than their greenfield counterparts. Indeed, the delivery rate for homes on greenfield sites is some 34% higher on average. Therefore, the reliance on brownfield sites in the first half of the Plan-period will likely cause under-delivery. Hence, the approach undermines the Plan's effectiveness as a whole.</p> <p>As noted, Policy H2 would allow a deviation from the proposed phased approach if this is required to ensure that a 5YHLS can be maintained. However, this then implies that the Council anticipates that the brownfield-first approach will not effectively sustain a 5YHLS. Indeed, in seeking to artificially restrict the development of greenfield sites (unless the 5YHLS position is different), the policy tacitly invites Section 78 appeals and a 'planning-by-appeal' approach.</p> <p>Overall, Vistry Partnerships considers the brownfield-first phased approach unnecessary, unjustified, ineffective, and inconsistent with national planning policies. Indeed, it is nonsensical that the Council retains this proposal (as carried over from the last Regulation 18 Consultation) in the full knowledge of the new Government's much stronger emphasis on housing delivery, as set out in the recent consultation on a revised NPPF and Standard Method, and reinforced by the Written Ministerial Statement (July 2024).</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The proposal to restrict the delivery of greenfield sites is contrary to national planning policy is not positive and likely to be ineffective. The concept should be removed from the policy wording specifically and the Plan as a whole.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As above – the strategy for this Policy should be removed in its entirety.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Letter (commenting on policies and evidence base - includes tables)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 1 \(Affordable Housing Statement\)](#)

[Supporting document 2 \(Vision Document 1 - Pitt Vale\)](#)

[Supporting document 3 \(Vision Document 2\)](#)

[Supporting document 4 \(Landscape and Visual Technical Note\)](#)

[Supporting document 5 \(Biodiversity Net Gain Feasibility Report\)](#)

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Gleeson Land
<b>Personal reference number</b>	ANON-AQTS-3299-G
<b>Full reference number</b>	ANON-AQTS-3299-G/11/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Whilst we do not object to strategic policies setting out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed, as required by the NPPF 123, the development of brownfield land is fraught with complexity which can impact viability. The policy states that “Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period.” Brownfield sites are not necessarily in the most sustainable locations for growth so this justification for the policy is overstated. The policy then goes on to list greenfield development sites which “...will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time”.</p> <p>Firstly, from our review of the documentation produced by the Council, we can find no housing trajectory has been published with this local plan consultation; therefore it is not clear what assumptions have been made about the delivery of brownfield sites up to April 2030, contrary to NPPF paragraph 75. It is therefore impossible to ascertain if the assumptions made about their lead-in times and delivery are realistic. Notwithstanding our other points about the plan’s inability to meet housing needs, it is not positively prepared because there is no evidence there is sufficient housing supply with realistic assumptions about its delivery to, as a minimum, seeks to meet the area’s objectively assessed needs. Failure to provide a trajectory is a failure to provide proportionate evidence, as such the plan is also not justified on this basis.</p> <p>Secondly, it would not be appropriate to wait until there is a housing land supply shortfall to release greenfield land for development earlier than planned. A scheme would have to come from a standing start to produce an application, submit it, then be determined. Then follows potentially a reserved matters application, discharge of conditions, opening up works, all before the first house is built. To ensure there is not such a long lead in time between a forecast 5YHLS deficit and actual delivery on the ground of ‘reserve sites’, it must therefore be the case that this trigger mechanism must be if there is a forecast housing land supply shortfall in at least one years time, then the sites should be realised earlier for development. This is the case in the Reigate and Banstead local plan.</p>



	<p>This is particularly important in the context that the only residential allocation in Waltham Chase (Morgans Yard), a brownfield site, has had a live planning application submitted for three years which is yet to be determined. This site is a 'rolled-over' allocation from the already adopted Winchester Local Plan. This goes to show that brownfield sites can be notoriously difficult to develop, and if they fail, there should be other sites in the same location allocated to take their place.</p> <p>Paragraph 60 of the NPPF (2023) states it is important that a sufficient amount and variety of land can come forward where it is needed, this policy as drafted does not accommodate this.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This policy should be deleted. If it is retained, the wording should be amended to "...unless they are needed to overcome a district level housing land supply shortfall now, or in one years' time under a projected 5YHLS scenario".
<b>What is your suggested wording or text for the policy?</b>	This policy should be deleted.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Mark Behrendt (HBF)
<b>Personal reference number</b>	ANON-AQTS-32GG-C
<b>Full reference number</b>	ANON-AQTS-32GG-C/6/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>This policy seeks to prevent some of the sites allocated for development being permitted until after April 2030 unless they are needed to overcome a district level housing land supply shortfall. The policy is considered to be necessary in order to prioritise the delivery of brownfield development first and to maintain a reasonable level of provision across the plan period. With regard to the policy requiring the prioritisation of brownfield development unless there is a cross over in ownership between these sites phasing these sites until later in the plan period it is unlikely to secure the prioritised delivery of PDL sites.</p> <p>As to the need for phasing to even out the delivery of new development the HBF would disagree. There is significant need for housing in the short term not only in Winchester but across South Hampshire and the South East in general and there is no justification for delaying the delivery of new homes. As is shown earlier in this representation there is a substantial need for new homes across south Hampshire with shortfalls across the HMA now not later in the plan period. While HBF welcome the increase in delivery seen recently in Winchester the housing crisis has not disappeared and the to suggest that the delivery of new homes should be delayed appears somewhat perverse.</p> <p>In addition, HBF, as set out earlier are concerned that delivery timescales would appear to be overly optimistic, and the council may be required to push back more sites to the second half of the plan period meaning sites such as the ones in this policy must not be artificially delayed.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Vistry Group (land at Fairthorne Grange Farm and Brindle Farm, Curbridge, Whiteley)
<b>Personal reference number</b>	ANON-AQTS-32UE-R
<b>Full reference number</b>	ANON-AQTS-32UE-R/2/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Having regard to Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, it is clear that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced for Winchester and adjoining authorities, it seems clear that the phasing of the new greenfield allocations in Winchester District into the second half of the plan period is unnecessary. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - provision should be made in this plan for additional strategic allocations which would promote and maintain higher levels of dwelling completions. There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. Every sustainable opportunity in the south of the district should be taken to positively respond to the significant challenge.</p> <p>Vistry Group has promoted its land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road through earlier stages of plan making, including the preparation and submission of a Vision document which outlines the opportunity on this 23.8ha site adjoining North Whiteley. The site is referenced as CU32 in the Strategic Housing and Economic Land Availability Assessment 2023 as 'deliverable/developable' with an indicative capacity of 356 homes and the Vision document for Vistry presents a concept with the potential to deliver around 430 homes). The site is part of a wider area at North Whiteley that has seen recent infrastructure investment, and will see further investment, and the opportunities associated with this should be optimised. It is urged that this site CU32 be allocated now as part of a strategy that can deliver and maintain an upward housing trajectory and better address need arising in South Hampshire as part of the duty to co-operate.</p> <p>Vistry Group wishes to participate on this matter at the local plan examination.</p>
<b>What modification(s) are necessary to make the</b>	Delete phasing policy.

<p><b>policy legally compliant or sound?</b></p>	<p>Allocate Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road (site ref. CU32) as part of a series of additional allocations to meet objectively assessed need in Winchester District / wider unmet needs in South Hampshire.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Delete phasing policy.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Shorewood Homes
<b>Personal reference number</b>	ANON-AQTS-32UC-P
<b>Full reference number</b>	ANON-AQTS-32UC-P/2/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Council will need to keep an open mind regarding the supply of sites that it can draw upon to meet potentially higher housing numbers. Para 70 of the current NPPF (Dec 2023) recognises that small and medium sized sites can make an important contribution to meeting the housing requirements of an area. Residential redevelopment is identified as significant component of the Winchester windfall supply and Shorewood's 3ha proposed residential redevelopment site at Pitt Manor, Romsey Road, Winchester for 48 net new homes is evidence that this form of development will continue to be a reliable source of supply for the Town. The Pitt Manor site supports the Council's and Government's strategy to bring forward urban small/medium sites on a quick basis, enabling timely delivery to meet acute needs.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Supporting document (Commenting on policies)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/3/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24)</p> <p>Barwood Land object to policy H2, progressing the current phasing approach will inevitably lead to issues in the short-term housing supply and housing delivery not being located in the most appropriate locations. It is therefore considered that this policy is unsound as it has not been positively prepared and could in fact further restrict the LPA from meeting its housing need, particularly regarding affordable housing.</p> <p>It is widely known that delivering brownfield sites often involves overcoming significant constraints, which can impact a site's deliverability/ viability, with higher remediation and demolition costs making such sites more expensive to develop. Brownfield sites are also typically smaller and more physically constrained than greenfield sites and this combined with the higher remediation costs often results in the need for a greater height and density to be delivered on site, essentially the delivery of flats, over family houses. The increased costs can also often lead to concerns over viability and in many cases affordable housing is the first thing to be reduced to make the scheme more viable, while also mitigating other impacts (i.e. highways, education etc. infrastructure which will still need to be delivered in preference to affordable housing). Given the affordable housing need across the Winchester district and noting brownfield sites are only required to deliver 30% affordable housing, under the proposed affordable housing policy - policy H6 (rather than 40% for greenfield) this further compounds this issue. It is not considered a suitable approach to restrain the greenfield allocations which are most likely to deliver the required affordable housing the area so desperately needs. Greenfield land also has the potential to deliver on the government's net zero aspirations and make considerable biodiversity net gains, again something brownfield sites are more constrained to deliver.</p>



	<p>We acknowledge this policy has been updated, apparently to reflect comments arising from the Reg 18 Local Plan, however we cannot see how the inclusion of site-specific restrictions adds anything further in terms addressing the concerns raised. It is not considered appropriate to continue to progress a policy which adds further restrictions to any form of housing considered suitable for allocation, acknowledging the significant unmet need across the district.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) Strategic Policy H2 - Housing Phasing and Supply</p> <p>We acknowledge this policy has been updated, apparently to reflect comments arising from the Reg 18 Local Plan, however we cannot see how the inclusion of site-specific restrictions adds anything further in terms addressing the concerns raised. 2.39 Given the issues raised above it is not considered appropriate to continue to progress a policy which adds further restrictions to any form of housing considered suitable for allocation, acknowledging the significant unmet need across the district.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) Strategic Policy H2 - Housing Phasing and Supply</p> <p>We acknowledge this policy has been updated, apparently to reflect comments arising from the Reg 18 Local Plan, however we cannot see how the inclusion of site-specific restrictions adds anything further in terms addressing the concerns raised. 2.39 Given the issues raised above it is not considered appropriate to continue to progress a policy which adds further restrictions to any form of housing considered suitable for allocation, acknowledging the significant unmet need across the district.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a>  <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a>  <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a>  <a href="#">Supporting document 3 (Preliminary Flood Risk and Drainage Review)</a>  <a href="#">Supporting document 4 (Heritage Appraisal)</a>  <a href="#">Supporting document 5 (Map - Compliant Site Access)</a>  <a href="#">Supporting document 6 (Local Plan Site Promotion - Transport)</a></p>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Vistry Group Ltd
<b>Personal reference number</b>	ANON-AQTS-32N1-W
<b>Full reference number</b>	ANON-AQTS-32N1-W/2/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	See section 2 of our full regulation 19 response emailed separately to planning policy team. In summary, WCC's proposal to withhold permissions on proposed new allocations until after 2030 is not considered an effective or reasonable mechanism for controlling the delivery of housing. Given the considerable need for housing now, WCC should not be artificially restricting the delivery of sites they otherwise consider suitable for allocation.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	See full response submitted separately - in Summary, remove the phased restriction from new allocations which is unjustified and unsound and as soon as possible consider the delivery of their next large scale strategic site in a location that is highly accessible and best located to meet the needs of both Winchester District and their neighbours, such as the identified Growth Area east of Botley. Additional information submitted. Additional information submitted.
<b>What is your suggested wording or text for the policy?</b>	See full response submitted separately - in Summary, remove the phased restriction from new allocations which is unjustified and unsound and as soon as possible consider the delivery of their next large scale strategic site in a location that is highly accessible and best located to meet the needs of both Winchester District and their neighbours, such as the identified Growth Area east of Botley. Additional information submitted.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	Yes <a href="#">Letter (Comments on housing requirement and opportunity at Raglington Farm)</a> <a href="#">Supporting Information (Raglington Farm site location plan)</a>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Thomas Hutchinson
<b>Personal reference number</b>	ANON-AQTS-329E-V
<b>Full reference number</b>	ANON-AQTS-329E-V/3/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The housing phasing set out in Policy H2 is not consistent with national policy; nor is it justified, having regard to the reasonable alternatives and evidence available to the Council. Service centres in rural areas are vital for the wider rural area and deliberately holding back suitable sites in sustainable locations on the basis of stimulating development at the main settlement of District is based on a mis-reading of national policy. The reasons why service centres in rural areas require growth apply from the start of the Plan period and encouraging a delivery delay is harmful. The Policy contradicts Policy SP2 of the Plan which requires new homes in the Market Towns and Rural Area to be provided in the most accessible and sustainable locations to promote the vitality and viability of communities and Policy H1 of the Plan which requires delivery of sites allocated within and adjoining the most sustainable settlements.</p> <p>The use of phasing is generally only justified to co-ordinate provision of housing with infrastructure on which it depends. This is not the case for the rural service centres; in fact it is the provision of housing that is needed first in order to provide the support for local facilities and investment from the S106 and CIL money.</p> <p>The policy has no practical purpose as the evidence base for the spatial strategy clearly shows greenfield sites are required in all the spatial areas of the District; holding back development doesn't prevent greenfield sites from coming forward, it just delays the benefits that flow from their timely delivery.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Delete the policy.
<b>What is your suggested wording or text for the policy?</b>	None. The policy should be deleted.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/5/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The Draft Local Plan (paragraph 1.2 and Policy D6) posits a ‘brownfield first’ approach, which is then reflected in Draft Policy H2 through the notion of ‘phased development’. This seeks to restrict the delivery of greenfield sites in favour of the early delivery of previously developed land.</p> <p>Whilst the policy wording acknowledges that sites could be permitted to come forward ahead of their specified phasing, if the five-year housing land supply (‘5YHLS’) position is deficient, the overall approach does not meet the tests of soundness. Indeed, the proposal to artificially restrict the delivery of sites runs contrary to the requirements of NPPF Paragraph 60. This states that;</p> <p>"To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.</p> <p>The NPPF is unambiguous that a sufficient amount and variety of land can come forward where it is needed, and a corollary of this is that where sites are needed, they should be delivered without unnecessary delay. In contrast, the Draft Local Plan seeks to restrict the building out of many sites until later in the Plan Period. There appears to be no reasoned justification for this other than the intention to prioritise brownfield-led development.</p> <p>Whilst the NPPF supports the redevelopment of previously developed land, the Framework does not refer to a brownfield-first approach. Therefore, the approach proposed in the Draft Local Plan has no apparent basis in national planning policies. Noting this and taking account of the conflict with NPPF paragraph 60, the Council’s approach fails as a matter of principle.</p> <p>Moreover, it is unclear why allocations on previously developed land should be expected to come forward more easily and quickly than those on greenfield sites. Indeed, the approach appears counterintuitive, noting that brownfield sites are often already occupied for a non-residential existing use or may otherwise be subject to complexities and constraints, such as contamination. Indeed, as documented in our representation on Policy H1, the rolled-over allocations include previously developed sites that have been allocated for over a decade but have not come forward for residential redevelopment.</p>

	<p>The widely-cited Lichfield’s ‘Start to Finish’ report (Version 3, 2024) sets out research into the delivery of different types of development sites. The report finds that large brownfield sites deliver more slowly than greenfield sites, noting that the average build rate for greenfield sites is 34% greater when compared to equivalent brownfield sites. Therefore, the reliance on brownfield sites in the first half of the Plan-period will likely cause under-delivery. Hence, the approach undermines the Plan’s effectiveness as a whole.</p> <p>As noted, Policy H2 would allow a deviation from the proposed phased approach if this is required to ensure that a 5YHLS can be maintained. However, this then implies that the Council anticipates that the brownfield-first approach will not effectively sustain a 5YHLS. Indeed, in seeking to artificially restrict the development of greenfield sites (unless the 5YHLS position is different), the policy tacitly invites Section 78 appeals and a ‘planning-by-appeal’ approach.</p> <p>Overall, Catesby considers the brownfield-first phased approach unnecessary, unjustified, ineffective, and inconsistent with national planning policies. Indeed, it is nonsensical that the Council retains this proposal (as carried over from the last Regulation 18 Consultation) in the full knowledge of the new Government’s much stronger emphasis on housing delivery, as set out in the recent consultation on a revised NPPF and Standard Method, and reinforced by the Written Ministerial Statement (July 2024).</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The proposal to restrict the delivery of greenfield sites is contrary to national planning policy, not justified and likely to be ineffective. The concept should be removed from the policy wording specifically and the Plan as a whole.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As above – the strategy for this Policy should be reconsidered. The proposal to restrict the delivery of greenfield sites is contrary to national planning policy, not justified and likely to be ineffective. The concept should be removed from the policy wording specifically and the Plan as a whole.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a>  <a href="#">Supporting document 2 (Vision Framework)</a>  <a href="#">Supporting document 3 (Concept Plan)</a>  <a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a></p>



*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32NP-V
<b>Full reference number</b>	ANON-AQTS-32NP-V/1/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy H2 proposes a phased trajectory for greenfield allocations, whereby development of 795 dwellings on greenfield site allocations is restricted until the latter half of the plan period, including Site Allocation CC2, Colden Common Farm. Paragraph 9.23 explains that this is to maintain a reasonable level of provision in these phases and prevent all housing provision being built out in the early years of the plan. The plan conflicts with paragraph 75 of the NPPF as it is unsupported by any detailed trajectory on housing delivery over the period to 2040 and associated evidence to justify that the brownfield sites and quantum would be developable in the first half of the plan period. Paragraph 9.24 of the plan rightly acknowledges that Brownfield sites often have a long lead in time in terms of delivery. The development of brownfield sites is generally complex, with greater constraints including demolition, site contamination and remediation for example. This therefore conflicts with the approach in H2 to phase these towards the earlier parts of the plan period.</p> <p>The proposed approach is wholly inconsistent with the Government's objective to significantly boost the supply of housing and with NPPF paragraph 60 which requires that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Restricting new development in the first half of the plan period to those existing allocations and brownfield sites prevents an even distribution of growth across the district and does not allow for a range and choice of available, suitable and deliverable sites to come forward in line with paragraph 69 of the NPPF.</p> <p>3The Written Ministerial Statement of July 2024 confirms the existence of acute housing needs and a national crisis of housing, which must be addressed now. The phased approach in H2 has not been positively prepared to align with Government's clear direction of travel to increase the delivery of homes. There should not be barriers placed on the delivery of housing on sites that are immediately available, suitable and can be built out quickly.</p> <p>The Plan should encourage the delivery of brownfield sites whilst not artificially restricting the delivery of available and suitable greenfield sites, which are capable of delivering homes, including affordable homes, immediately and in greater numbers.</p>

	Summary/Recommendation - The phased housing trajectory is not justified or positively prepared to achieve sustainable development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The phasing restriction on greenfield sites should be removed.
<b>What is your suggested wording or text for the policy?</b>	Policy should be removed.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting information (comments on policies)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/22/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Bloor Homes do not support the phasing of housing delivery throughout the plan period. The draft policy wording currently states that 'phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory.' Bloor Homes considers this approach to be overly restrictive and fails to apply a flexible methodology that would safeguard the district's future housing provision against unforeseeable shortfalls or downturns in the market arising from ongoing economic issues.</p> <p>It is clear from Winchester City Council's trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced under the revised standard method, the phasing of the new greenfield allocations in Winchester District into the second half of the plan period is unnecessary. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - provision should be made in this plan for additional strategic allocations which would promote and maintain higher levels of dwelling completions.</p> <p>According to paragraph 82d) of the National Planning Policy Framework (NPPF), "planning policies should be flexible enough to accommodate needs not anticipated in the plan". This is considered particularly applicable to the growth requirements and potential of Wickham. Equally, NPPF paragraph 11 highlights that 'plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.' Accordingly, introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.</p>

	<p>Consequently, the policy wording should be revised to incorporate greater flexibility. and to not exclude other greenfield or other non-allocated deliverable sites from coming forward earlier in the plan period. This would also support the sustainability of settlements which would be frustrated if development is artificially held back. There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. All sustainable opportunities for the provision of housing in the district should be taken to positively respond to the significant challenge.</p> <p>Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The policy wording should be revised to incorporate greater flexibility and to not exclude other greenfield or other non-allocated deliverable sites from coming forward earlier in the plan period. This would also support the sustainability of settlements which would be frustrated if development is artificially held back. There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. All sustainable opportunities for the provision of housing in the district should be taken to positively respond to the significant challenge.</p> <p>Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The policy wording should be revised to incorporate greater flexibility and to not exclude other greenfield or other non-allocated deliverable sites from coming forward earlier in the plan period. This would also support the sustainability of settlements which would be frustrated if development is artificially held back. There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. All sustainable opportunities for the provision of housing in the district should be taken to positively respond to the significant challenge.</p> <p>Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.</p>

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies, policies map and evidence base)</a> <a href="#">Vision document (Land At Mill Lane, Wickham)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	David Hayward
<b>Personal reference number</b>	ANON-AQTS-32NB-E - Havant Borough Council
<b>Full reference number</b>	ANON-AQTS-32NB-E - Havant Borough Council/1/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Havant Borough Council (HBC) continues to engage with Winchester City Council and both authorities have discussed the proposed Reg 19 Local Plan and critically have agreed a framework amendments through an updated Statement of Common Ground. This was agreed between the authorities on 11 October 2024. These comments relate to the Reg 19 plan as published for procedural reasons. 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 basis that the framework of amendments agreed between the authorities described in this representation and our statement of common ground are enacted in the plan, the Borough Council would fully support the soundness and legal compliance of the plan.</p> <p>HBC considers that Paragraph 9.13 would be more accurate if it referenced that the local plan should provide 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.</p> <p>Table H2 and paragraph 9.20 reference ‘an unmet needs allowance of 1,900 dwellings as a contribution towards the unmet needs of neighbouring areas in South Hampshire’. Havant Borough Council notes the position in the Regulation 19 Winchester District Local Plan as published of a 1,900 “unmet needs allowance (for unmet need in neighbouring authorities)” as set out in table H2. Havant Borough Council considers that in order for the Wincher 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.</p> <p>It is considered that if a significant proportion of the unmet need allowance is apportioned explicitly to addressing unmet housing need in Havant Borough that this would represent a sizeable and significant contribution to addressing unmet need, in line with paragraphs 35 (a) and (c) of the NPPF (the ‘positively prepared’ and ‘effective’ tests of soundness).</p> <p>This would also reflect the recently signed Statement of Common Ground between the two authorities. It is anticipated that as the plan proposals are tested through the examination, and discussions continue, a precise figure can be included. It is considered that such an approach would represent a sound approach,</p>

	<p>considering the additional formal request from Portsmouth City Council to accommodate unmet housing need.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>As set out in the statement of Common Ground signed on 11th October 2024, both Winchester City Council and Havant Borough Council agree that the Winchester District Local Plan would meet the ‘positively prepared’ and ‘effective’ tests of soundness if the unmet need allowance is specifically apportioned to individual local authorities. The framework for changes set out below is considered to represent the agreed position of both local authorities, reflecting our statement of common ground.</p> <p>The apportionment of the unmet need allowance should be representative of the total unmet need between the two authorities, when also considering the inclusion of an 800 home allowance in the recently adopted Fareham Local Plan.</p> <p>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:</p> <ul style="list-style-type: none"> <li>- To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan.</li> <li>- To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan.</li> </ul> <p>This is set out in further detail in the statement of common ground, particularly footnote 13. As set out in the statement of common ground, it is accepted that the housing supply position has not yet been tested at examination. As such, the above framework for the distribution of unmet need should be revisited through the examination process in the event that:</p> <ul style="list-style-type: none"> <li>- An additional ask is made of Winchester regarding any unmet need; or</li> <li>- The housing target and/or unmet need allowance in the Winchester District Local Plan changes in the course of its examination.</li> </ul> <p>This revisiting of the approach should be a collaborative exercise between Winchester City Council, Havant Borough Council and Portsmouth City Council.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As set out in the statement of Common Ground signed on 11th October 2024, both Winchester City Council and Havant Borough Council agree that the Winchester District Local Plan would meet the ‘positively prepared’ and ‘effective’ tests of soundness if the unmet need allowance is specifically apportioned to individual local authorities. The framework for changes set out below is considered to represent the agreed position of both local authorities, reflecting our statement of common ground.</p> <p>The apportionment of the unmet need allowance should be representative of the total unmet need between the two authorities, when also considering the inclusion of an 800 home allowance in the recently adopted Fareham Local Plan.</p>



	<p>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:</p> <ul style="list-style-type: none"> <li>- To Portsmouth City Council: 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan.</li> <li>- To Havant Borough Council: 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan.</li> </ul> <p>This is set out in further detail in the statement of common ground, particularly footnote 13. As set out in the statement of common ground, it is accepted that the housing supply position has not yet been tested at examination. As such, the above framework for the distribution of unmet need should be revisited through the examination process in the event that:</p> <ul style="list-style-type: none"> <li>- An additional ask is made of Winchester regarding any unmet need; or</li> <li>- The housing target and/or unmet need allowance in the Winchester District Local Plan changes in the course of its examination.</li> </ul> <p>This revisiting of the approach should be a collaborative exercise between Winchester City Council, Havant Borough Council and Portsmouth City Council.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policy)</a>  <a href="#">Form (commenting on policy)</a>  <a href="#">Supporting document (update on Havant BC Local Plan, housing need and supply position)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/8/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Bargate Homes do not support the phasing of housing delivery throughout the plan period, for the reasons outlined in our response to Policy H1: the need is now and there is no justification to delay delivery of housing on sustainable sites.</p> <p>The draft policy wording currently states that ‘phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory.’ However, there is no support for this approach in the NPPF and in the context of the need to boost land supply.</p> <p>The NPPF paragraph 82d) states that ‘planning policies should (be)...flexible enough to accommodate needs not anticipated in the plan’. Equally, NPPF paragraph 11 highlights that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.’ Accordingly, the introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This policy should be deleted.
<b>What is your suggested wording or text for the policy?</b>	Removal of this policy.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Mark, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/7/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H2 : Strategic Housing and Supply Policy H2 includes an approach to phasing new greenfield housing sites allocated within the Reg 19 Plan. This is intended to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. Accordingly, new greenfield allocations will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall, or to meet an identified priority need. Whilst the ambition is commendable, it brings with it a significant risk of failing to deliver sufficient housing to meet needs within the five year period. As evidence below, several of the allocations on previously developed sites have considerable uncertainty regarding timescales for delivery. It is accepted that Policy H2 has a caveat in relation to circumstances where there is a housing land supply shortfall, 8 but this builds in a risk that speculative applications that sit outside the existing and proposed commitments will come forward.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/12/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Strategic Policy H2 aims to restrict the delivery of housing sites until after April 2030 to prioritise brownfield land. This is counter to National policy which seeks to significantly boost the supply of housing and as such should not be included. The delivery of brownfield sites is often complex and should not therefore be relied upon to meet the immediate needs. A suite of delivery sites will be required to meet the needs, both brownfield and greenfield and artificial management through the planning system is likely to lead to delays and a shortfall in supply.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The reg. 19 plan should be modified to remove Strategic Policy H2.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a> <a href="#">Supporting document 1 (South Winchester Vision Document)</a> <a href="#">Supporting document 2 (Response to the delivery of housing)</a> <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a> <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a> <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Hathor Property
<b>Personal reference number</b>	ANON-AQTS-32T7-9
<b>Full reference number</b>	ANON-AQTS-32T7-9/7/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H2 : Strategic Housing and Supply Policy H2 includes an approach to phasing new greenfield housing sites allocated within the Reg 19 Plan. This is intended to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. Accordingly, new greenfield allocations will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall, or to meet an identified priority need. Whilst the ambition is commendable, it brings with it a significant risk of failing to deliver sufficient housing to meet needs within the five year period. As evidence below, several of the allocations on previously developed sites have considerable uncertainty regarding timescales for delivery. It is accepted that Policy H2 has a caveat in relation to circumstances where there is a housing land supply shortfall, but this builds in a risk that speculative applications that sit outside the existing and proposed commitments will come forward.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Letter (commenting on policies and proposed site)</a>



*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/6/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>9.37 Strategic Policy H2 – Housing Phasing and Supply provides a suggested approach to housing delivery based on the proposed housing strategy, the principal components of which are already committed via allocating policies (largely MDA policies) contained in the adopted Local Plan, and the significant unplanned contribution expected from windfall sites. The supporting text notes that the new Plan can therefore exert no control over these sources of supply, which are expected to be developed in the first half (sic) of the plan period, 2020-2030 (in effect within five years of the plan being adopted).</p> <p>9.38 The intention is therefore to impose a policy that prevents green field development sites from coming forward before April 2030 and thereafter to allow annual supply to fall generally year-on-year from around 2025-26, shortly after the plan is scheduled to be adopted . During the early years the graph indicates that supply will exceed the annualised rate of provision across the plan period (755 dwellings pa) and then fall consistently from around 2034/35. It is notable that under the proposed strategy of the 2040 plan, which does not pursue an ambitious allocations policy, that from the likely date of adoption (2025/26), supply is consistently well below the threshold of 1,000 dwellings per annum, which would need to be exceeded annually to meet the minimum housing requirement for the district under the new standard methodology.</p> <p>9.39 As contended throughout these representations, the future development plan strategy should focus on allocating MDA scale development at Winchester to ensure that sufficient housing is provided to address the structural challenges that exist and to provide continuity of supply. As already evidenced by the examples of Whiteley, Waterlooville, and Barton Farm, MDA developments have longer lead times compared to smaller non-strategic sites (although the experience locally in respect of these three examples is not typical due to unusually protracted land assembly and ownership constraints) and therefore naturally phase themselves over a plan period without the need to impose artificial restrictions, which are not supported by national policy. The introduction of new strategic scale development in the form of successor MDA allocation(s) would provide for continuity of supply over an extended plan period, picking up delivery as the committed MDA sites move towards completion, offering certainty and predictability of housing supply. It is vital that purposive planning at scale is undertaken via the immediate review of this plan. The land controlled by Vistry and</p>

	<p>Taylor Wimpey would provide a highly sustainable and compatible MDA scale allocation to the north of Winchester, building upon the successful allocation of land at Barton Farm.</p> <p>9.40 The Council's proposed phasing policy would not be necessary in the form proposed if a proactive and coordinated MDA policy is incorporated into the Local Plan.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The policy is unnecessary.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The policy should be deleted.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a>  <a href="#">Supporting Document (Planning for South Hampshire)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/3/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Paragraph 9.23</p> <p>Reflecting the points made above regarding Policy H1, it is noted that the phasing approach set out in paragraph 9.23 responds to the current housing land supply, and to meeting the housing requirement set out in the draft Local Plan over the 20 year period to 2040. With regard to the provisions set out in the draft NPPF published in July 2024, it is clear that housing delivery, the phasing approach set out in paragraph 9.23 and the accompanying housing trajectory will be effectively out of date as soon as the Local Plan is adopted. There would seem to be an opportunity to set out in paragraph 9.23 and the housing trajectory, that the Council will seek to boost housing delivery above these levels in order to respond to the provisions set out in the emerging NPPF – again ensuring that a flexible approach to housing supply and delivery is taken in the Local Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There would seem to be an opportunity to set out in paragraph 9.23 and the housing trajectory, that the Council will seek to boost housing delivery above these levels in order to respond to the provisions set out in the emerging NPPF – again ensuring that a flexible approach to housing supply and delivery is taken in the Local Plan.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	No

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Guy Allison
<b>Personal reference number</b>	ANON-AQTS-322Q-1
<b>Full reference number</b>	ANON-AQTS-322Q-1/2/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	While understanding the need for new homes, comparing the amount of land available within the Bishops Waltham and New Alresford boundaries, it is hard to see how New Alresford can meet the indicated and proposed 100 additional houses without impacting the wider commitments made within the Local Plan, especially with regards to protecting environmental factors.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Reduce the additional housing commitment proposed for New Alresford. Alternatively, consideration may be needed to be given to expanding the New Alresford boundary to include land more suitable to development, and which is possibly available from local landowners.
<b>What is your suggested wording or text for the policy?</b>	I believe this should be no more than 50 additional houses, given the housing increase already committed to / underway within the boundary. The available space within New Alresford boundary is already severely limited and therefore more than 50 houses is in direct conflict with environmental commitments, and the need for sufficient green spaces for communities.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	The Clay Family
<b>Personal reference number</b>	ANON-AQTS-32MY-4
<b>Full reference number</b>	ANON-AQTS-32MY-4/4/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Strategic Policy H2 sets out that phasing will be applied to new greenfield housing sites allocated by the Local Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. 12 sites are identified, including the site allocated under policy CC4, to not be permitted in advance of April 2030 unless 'they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time'. These sites contribute a total of 655 dwellings to the housing requirement in the plan period. It is unclear what purposes the phasing serves in terms of boosting housing supply or indeed why housing should be prevented or rather delayed when the need should be met now. It may be to delay the housing delivery trajectory from falling below the annual housing target until later in the plan period to ensure that a robust housing land supply is maintained, and speculative applications are not made. But, it is argued that if this were the case there would still be speculative application made when the housing delivery tails off and therefore it would be better to maintain larger housing supply to ensure a consistent delivery over the plan period.</p> <p>Whilst it is appreciated that it is appropriate to consider brownfield first before greenfield in terms of where development should be directed to, it is considered that taking a brownfield first approach to phasing is not. This is due to there being several complex brownfield sites (particularly within the city centre), it is considered that the proposed phasing could prevent much needed homes coming forward in the early years of the plan period. Paragraph 9.24 of the Regulation 19</p> <p>Local Plan Consultation states that 'Brownfield sites, which often have a long lead in time in terms of delivery have been specifically phased towards the earlier parts of the Plan period ...'. This rationale is not understood nor supported. Such a strategy could result in the under delivery of much needed homes in the early years of the plan period, which could result in speculative applications on unallocated and potentially unsustainable sites within the District.</p>



The 12 sites which are prevented from being permitted for development until after April 2030, are all considered to be unconstrained, sustainable sites in accessible locations which are well-related to existing settlements. These would provide a positive and fundamental contribution towards the local housing need. It is therefore considered that the proposed phasing is overcautious, not justified and inconsistent with the Government's aim to deliver 1.5 million homes in the next 5 years or significantly boosting the supply of homes as required by Paragraph 60 of the NPPF. Further, as of 15 July 2024, 1,609 households were registered on Winchester City Council's Housing Register with the average wait time being 1 year and 5 months. As such, as currently drafted, the Regulation 19 Local Plan does not meet the current of future housing requirement and therefore fails tests of soundness as set out in Paragraph 35 of the NPPF. To the author's knowledge, there have been no recently adopted Local Plans which apply a phasing approach which prevents sustainable development coming forward until later in the plan period. This is believed to be because such an approach would be found unsound at examination.

The 'Effect of phasing on Housing Trajectory' graph on page 218 of the Regulation 19 Local Plan, extracted below, details that without the proposed phasing there will be a significant boost in the delivery of housing from 2025/26 to 2031/32. This increased level of delivery is wholly in accordance with the Government's aim to deliver 1.5 million homes in the next 5 years and therefore this alone demonstrates why the proposed phasing set out in Strategic Policy H2 should not be allowed or found sound once the Local Plan is submitted for examination. Further, it is highlighted that the land adjoining to 85 Church Lane allocated by Policy CC4, has the proposed suppressive phasing clause within the policy which is unjustified. The landowner is committed to seeking to support and help achieve the Government's aim to increase housing delivery over the next 5 years and therefore emphasise that the proposed allocation could come forward in the near future which would further boost Winchester's housing supply in the short term. As highlighted by Paragraph 70 of the NPPF, 'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'. Additionally, the PPG states that "strategic policy-makers should ensure there is not continued delay in meeting identified development needs". Therefore, this must be considered in terms of how achievable, available, suitable, and therefore deliverable sites - including greenfield sites - can be achieved at any point of the Plan period, and should not be prevented from coming forward until brownfield sites have been delivered.

In summary, the phasing of the development is actively suppressing the delivery of housing when the need should be met immediately.

In the light of the above comments, we urge the Council to remove the proposed phasing set out in Strategic Policy H2. Together with the removal of the proposed phasing and restriction of 12 greenfield sites coming

	<p>forward before 2030, we suggest the Council seeks to allocate a range of further sites to boost and bolster the housing land supply throughout the plan period.</p> <p>It is confirmed that the land allocated by Policy CC4 can deliver the 10 homes within 12 months from commencement of development. It should therefore not be held back from making an important and early contribution to Winchester's Housing Supply.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Delete Policy H2</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Delete associated text</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	George Whalley
<b>Personal reference number</b>	BHLF-AQTS-32EY-V
<b>Full reference number</b>	BHLF-AQTS-32EY-V/4/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H2 – Housing Phasing and Supply</p> <p>2.34 We object to Policy H2 and the proposed phasing of green field allocation sites as it is not justified or effective. The draft policy may result in the housing requirement not being provided for during the Plan period and affect the ability to maintain a 5- year land supply. Furthermore, it does not identify sufficient sites to address unmet housing need or include the most sustainable sites that are suitable, available, achievable and consistent with the settlement hierarchy.</p> <p>2.35 Policy H2 Phasing and Supply sets out the phasing of allocated greenfield sites to the second half of the Plan period 2030 – 2040 unless they are needed to come forward earlier to overcome a District housing land supply shortfall.</p> <p>2.36 The Local Plan states that the justification for phasing new allocations to come forward post 2030 relates to the need for a balanced housing trajectory across the plan period and in view of housing supply from completions, commitments and windfall in the first half of the plan period (2020 – 2030). However, this does not take account of potential delays to the delivery of strategic sites and a nonimplementation rate for planning permissions requiring further housing supply from green field sites which can be delivered without delay in the first 5 years of the Plan period.</p> <p>2.37 The revised NPPF also proposes changes to the standard method which will significantly increase the level of unmet housing need in the area. The Winchester Winchester Proposed Submission Local plan 2020 – 2040 makes provision for 1,900 dwellings to contribute towards unmet housing need, but this does not address definitive unmet need in the area or the increase in unmet need as a result of proposed changes to the NPPF and standard method.</p> <p>2.38 There is definitive unmet housing need from neighbouring authorities including Havant, Portsmouth, Southampton and Gosport Councils which has not been provided for in Winchester District or in neighbouring authority areas. It is anticipated that there will also be unmet housing need from the South Downs National Park in relation to landscape constraints and past rates of housing delivery.</p> <p>2.39 Following the proposed revised NPPF and changes to the standard method there is also significant potential for unmet housing need to arise from Basingstoke and Deane Borough Council, East Hants District</p>

Council, New Forest District Council, Test Valley Borough Council, Eastleigh Borough Council and Fareham Borough Council.

2.40 Therefore, there is a need for the local plan to bring forward sufficient green field allocations in the first 5 years to provide for Winchester District LHN, maintain a 5-year land supply and better address unmet housing needs of neighbouring authorities.

#### Nutrient Neutrality and Deliverability of Allocations

2.41 There is also a need to include sufficient greenfield sites in the Plan that are deliverable in the first 5 years of the Plan period and not constrained by the need for nutrient neutrality phosphorus mitigation requirements. The following table sets out the river catchment areas and mitigation requirements for the greenfield allocations currently set out in Policy H2 in relation to nitrogen and phosphates (as identified in the Regulation 19 HRA report<sup>5</sup>): Of these green field allocations, 7 sites are within the River Itchen catchment with a combined residential capacity for about 435 dwellings. These sites are required in accordance with Local Plan Policy NE16 of the Submission Plan to achieve nutrient neutrality in relation to nitrogen and phosphates.

2.43 A nutrient neutrality topic paper<sup>6</sup> has been prepared by the Council and published alongside the Proposed Submission Draft Local Plan to set out the Plan strategy for achieving nutrient neutrality. In relation to phosphates the topic paper identifies a programme for the upgrading of Council owned waste-water treatment works (WWTW's) to package treatment works to generate a reduction in phosphorus. The Council have completed the upgrades for the first two waste-water treatment works to provide phosphorus mitigation in the short term. The initial improvements generated 10.55Kgs/TP/Yr this is enough to unlock the current backlog of planning applications and meet the nutrient mitigation demand for the Local Plan allocations in the first year of the Plan period. The Council has an ongoing programme of improvements to council owned waste-water treatment works which is anticipated will generate further nitrogen and phosphates credits. However, there remains an outstanding phosphorus load for the 7 sites identified where further mitigation is required and this may delay the delivery of some of these sites until significantly later in the Plan period (Beyond 2030). This will affect housing supply, the ability to maintain a 5-year housing land supply and potentially the delivery of the housing requirement within the Plan period.

2.44 In conclusion there is a need to ensure that the Plan housing requirement is met through a greater contribution towards unmet housing needs in the area. This will require the identification of additional greenfield sites in accordance with the settlement hierarchy which do not require mitigation for phosphorus in relation to the River Itchen. This should include sites adjoining the most sustainable settlements including Bishops Waltham. Land at Mill Chase is relatively unconstrained, sustainably located in Bishops Waltham and capable of delivering about 50 homes in the first 5 years of the Plan period. The site is deliverable and does not require mitigation for phosphorus. The site should be allocated in the local plan and included within Policy H2 (phased in the first half of the plan period) to provide flexibility in housing land supply.

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Supporting information (commenting on policies and proposed site)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	George Whalley
<b>Personal reference number</b>	BHLF-AQTS-3263-7
<b>Full reference number</b>	BHLF-AQTS-3263-7/1/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H2 – Housing Phasing and Supply</p> <p>We support the allocation of Policy W4 'Land West of Courtenay Road'. The site is sustainably located on the settlement edge of Winchester and accessible to key services and facilities including primary and secondary schools, retail, health, community and leisure facilities. The site is also well connected to the adjacent Kings Barton strategic allocation and associated range of facilities as set out in our response to Policy W4.</p> <p>We object to Policy H2 and the proposed phasing of greenfield allocation sites as it is not justified or effective. The draft policy increases the risk of the Local plan housing requirement not being provided for during the plan period, a failure to maintain a 5-year land supply and for unmet housing needs to be effectively addressed. Policy H2 and allocation Policy W4 should be amended with a higher residential capacity of 'about' 160 dwellings phased in the first half of the Plan period.</p> <p>Policy H2 'Phasing and Supply' sets out the phasing of allocated greenfield sites to the second half of the Plan period 2030 – 2040 unless they are needed to come forward earlier to overcome a district housing land supply shortfall.</p> <p>The draft Plan states that the rationale for phasing new allocations to come forward post 2030 relates to the need for a balanced housing trajectory across the Plan period and in view of housing supply from completions, commitments and windfall in the first half of the plan period (2020 – 2030). However, this does not take account of potential delays to the delivery of strategic sites and a non-implementation rate for planning permissions requiring further housing supply from greenfield sites which can be delivered without delay in the first 5 years of the Plan period. The draft NPPF (July 2024) is also of relevance which sets out the Government's response to the housing crisis and the expectation for Local Authorities to 'make every effort to allocate land in line with their housing need as per the standard method'. In addressing the housing crisis, providing for LHN and effectively addressing unmet housing need, greenfield allocations should be phased in the first half of the Plan period to ensure housing needs are met.</p> <p>The draft NPPF also proposes changes to the standard method which will significantly increase the level</p>

	<p>of unmet housing need in the area. The Regulation 19 Draft Local Plan makes provision for 1,900 dwellings to contribute towards unmet housing need, but this does not address definitive unmet need in the area or the increase in unmet need as a result of proposed changes to the standard method. There is a substantial unmet housing need from neighbouring authorities including Havant, Portsmouth, Southampton and Gosport Councils which has not been provided for in Winchester district or in neighbouring authority areas. It is anticipated that there will also be unmet housing need from the South Downs National Park in relation to landscape constraints and past rates of housing delivery.</p> <p>Following the proposed revised NPPF and changes to the standard method there is also significant potential for unmet housing need to arise from Basingstoke and Deane Borough Council, East Hants District Council, New Forest District Council and Test Valley Borough Council. There is also the potential for Eastleigh and Fareham Councils to have difficulty in meeting their needs as part of their Local Plan reviews.</p> <p>Therefore, there is a need for the Regulation 19 Draft Local Plan to bring forward sufficient greenfield allocations in the first 5 years to provide for Winchester District LHN and to better address unmet housing needs of neighbouring authorities.</p> <p>It is critical that the Local Plan identifies sufficient housing supply to provide for local housing need (LHN) (derived from the standard method) with an appropriate buffer and to maintain a 5-year housing land supply. There is a need for medium sized greenfield allocations such as Land West of Courtenay Road to come forward in the first 5 years of the plan to maintain a 5-year housing land supply and to contribute to unmet housing need from neighbouring authorities and within the PfSH area. It is precisely sites such as Courtenay Road, which are immediately deliverable and being promoted by an established housebuilder, that are best positioned to address chronic unmet need arising from both Winchester CC and the wider PUSH authorities. The submitted Vision Statement demonstrates that the site is suitable, available and achievable and deliverable in the next 5 years.</p> <p>see addition info PDF</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting information 1 (Vision statement)</a>



<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/5/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy H2</p> <p>4.6 This policy is considered to be:</p> <ul style="list-style-type: none"> <li>• Not legally compliant</li> <li>• Not sound</li> <li>• Not in compliance with the duty to co-operate</li> </ul> <p>4.7 WDC is seeking to phase its delivery of sites, with greenfield housing sites allocated within the plan to be held back until the later part of the plan period (from April 2030 on) “unless they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time”. The policy will therefore lead to 795 dwellings being held until 2030, unless there is a shortfall in deliverable supply at an earlier stage. Para 60 NPPF 2023 states that “land with permission is developed without unnecessary delay” and that the “overall aim should be to meet as much of an area’s identified housing need as possible”, noting that the draft NPPF 2024 further clarified that the entirety of an identified housing need should be met. Section 9.23 local plan states that the phased approach ensure that a reasonable level of provision in all phases can be maintained throughout, particularly between years 2031 to 2034.</p> <p>4.10 Whilst the justification for this approach is understood, it is not considered to align with the NPPF in that it would effectively prohibit allocated sites from being developed without delay. There is a realistic risk that landowners and/or developers of these sites will need to proceed prior to 2030 to secure ongoing cashflow within their respective businesses (assuming most of these sites to be developed by SMEs rather than PLCs given their scale). This would inherently contravene Policy H2, therefore with a high risk of being refused locally, which would likely lead to additional appeals at a wholly avoidable cost and resources.</p> <p>4.11 In light of inconsistency with the NPPF and the potential issues that are likely to arise, this policy should be removed.</p> <p>see additional info PDF</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Chris Rees
<b>Personal reference number</b>	BHLF-AQTS-326G-U
<b>Full reference number</b>	BHLF-AQTS-326G-U/1/H2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Paper addresses the Council’s most recent position in respect of its Housing Land Supply, which has a direct correlation to its approach to Strategic Policy H2 and the Phasing of Housing Sites. The City Council has erred in its calculation of past housing delivery performance, falling foul of assessing performance in line with the Practice Guidance and comparing the housing numbers delivered (housing completions) against the quantum required (housing requirement). The LPA has for the period 2011-2018 failed to do this, and instead for the Period 2011-2016 deemed the number of homes completed to be its ‘requirement’, and from 2016-18, what it had projected to be completed, totalling 3,226 dwellings. The true housing requirement during this period was 4,375 new homes.</p> <p>The LPA’s error centres on its approach to calculating its housing requirement in the period from April 2011 to March 2018; a 7 year period during which the Council did not use its specified housing requirement of 625 dwellings per annum, but instead, sought to use its Housing Trajectory formed as part of the Local Plan Part 1. As per Para 3.1.10-3.1.11 of the Appendix to the Winchester District Authorities Monitoring Report (December 2023), the Council has stated that its ‘housing requirement’ was of 3,226 dwellings, or the equivalent of 461 dpa, which was significantly lower than the actual requirement of 625 dpa. The 3,266 dwelling ‘requirement’ was in fact the actual number of past completions achieved from 2011 to 2016, and projected completions from 2016-2018. In essence, the Local Planning Authority has created the position where its housing requirement, against which it is to be judged, is in fact the cumulative completions (actual and projected) from 2011-2018.</p> <p>It is our considered view and in line with best practice, that the starting point for consideration of the housing supply position as of April 2023 shall be based on the housing requirement the Council was required to deliver in the period 2011-2023, against which the housing delivery performance from the Period 2011-2023 is compared. This follows best practice and simply compares requirement v’s completions with a consistent</p>

methodology. The mathematical conclusion being there is no over supply of 1,187 dwellings as advocated by the Council, but a marginal oversupply of 32 dwellings in the period 2011-2023.

In reality, the 5 year requirement from 2024 to 2029 is a much simpler calculation under the Government's new Standard Methodology, given the Government's intention to remove the use of oversupply within the context of calculating the 5 year requirement. Pending the outcome from the consultation, which will not be known before the Council's deadline for submission of representations, the 5 year requirement from 2024 to 2029 will be as follows:

Figure 6: New Standard Methodology Housing requirement 2024-2029

Annual Housing Requirement 2024-2029 1,009 dwellings

Sub-total 5 Year Requirement 5,045 dwellings

5% buffer 252 dwellings

Total 5 Year Requirement 5,297 dwellings

To put this into context and how significant applying the new Standard Methodology to Winchester City would be, compared to the LPA's artificially diluted 5 year requirement 2,534 dwellings, the Government's new Standard Methodology would see a 109% increase in the housing requirement within the District by 2029, aligning with the Government's stated aims to boost the supply of housing and deliver 1.5m new homes during the Parliamentary Period.

As per Table 11 of the AMR Appendix, the Council contend that it has a deliverable supply of 4,152 dwellings at April 2023 and 3,849 dwellings at April 2024, which it advocates demonstrates 'ample' land availability of 7.3 years in April 2023 and 7.6 years in April 2024. It is necessary to review the sources of supply, particularly those large sites that are yet to commence, and which the Council is identifying completions from within the period 2024-2029. We have the benefit of course for being towards the end of this first year of the 5 year period at the time of writing in late 2024, and therefore it is possible to assess with more accuracy the likelihood of the Council's projections coming forward.

The adjustments of these sites would reduce the supply by 160 dwellings from 370 to 210, which is a more robust assessment of what are for the two Council led projects, ones that have a history of stalling and are complex. Reducing the projected supply by 160 dwellings, the Council would only be able to show 5.7 years when the old Standard Methodology is used, and 3.5 years when compared to the new Standard Methodology.

The Council's Strategic Policy H2 seeks to hold back greenfield allocations and Neighbourhood Plan sites on the premise to prioritise the development of Previously Developed Land and achieve a suitable housing

	<p>trajectory (Policy H2). As shown, when the supply of housing within the District since 2011 is compared against the actual housing requirement as required by the Practice Guidance, there is only a marginal oversupply and the projected years supply falls to 5.7 years. Indeed, the brownfield sites the Council are advocating have priority, are its very own large regeneration projects within the City (Silver Hill, Station Approach, Bar End Depot), which have continuously failed to come forward. Far from having a significant buffer, based on the former Standard Methodology, the Council can only show less than 6 years supply. There is no sound reason therefore why there should be a phasing policy within the Local Plan, artificially holding back the delivery of new homes at a time when the Government, via its revise NPPF and the revised Standard Methodology, is imploring Local Planning Authorities to accelerate housing delivery.</p> <p>The Local planning Authority has not examined the consequences of its Policy on individual Towns and Villages, but on a macro level District Wide. per the Government’s recent revisions to the NPPF, its policy shift is designed to re-emphasise the importance of choice and competition in the market6, with Policy H2 restricting the ability for choice and competition where sites are being artificially held back. By way of example. the Neighbourhood Plan process for New Alresford provides local communities with the ability to shape the location and delivery of new homes within their Towns and Villages.</p> <p>It cannot be the case that at a time when the Government is seeking from housing developers the delivery of 1.5m new homes in the Parliamentary Period, that a Local Plan that artificially holds back deemed sustainable housing sites would be deemed ‘justified’ and ‘consistent with National Policy’.</p> <p>Conclusions and changes required</p> <p>This Paper has evidenced a significant error in the methodology used by the City Council in calculating its housing performance, which has been used to firstly quantify an oversupply that doesn’t exist, and compounded this position by seeking a housing policy that artificially holds back housing sites as a result. This error should be recognised by the LPA and the Inspector, and the necessary corrections made to the Council’s stated position. Thereafter, in recognition of the conflict in the phasing Policy with both the Council’s land supply position and National Policy, Policy H2 should be removed and the phasing of sites removed from the Local Plan. See additional PDF for info</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	

<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policy H2)</a>  <a href="#">Letter (commenting on policy H2)</a>  <a href="#">Form (commenting on policy H3)</a>  <a href="#">Letter (commenting on policy H3)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	YMCA Fairthorne Manor Group   Philipa Spicer
<b>Personal reference number</b>	BHLF-AQTS-328Y-F
<b>Full reference number</b>	BHLF-AQTS-328Y-F/7/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H2 provides the mechanism for the phasing, and we are concerned that it lists 12 sites, that could deliver homes quickly; but they will deliberately be prevented from doing so by the policy which states “Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. The following sites will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time” (underlining is my emphasis).</p> <p>6.41 We know that there will be a housing shortfall when the NPPF is amended, and even the Council has acknowledged that it would need to start an immediate review of the Local Plan, so we consider that this phasing needs to be removed, and all sites should be able to deliver new homes as soon as they are able.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Form (Table of policies)</a>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Letter \(commenting on Policies and Evidence Base - includes vision document\)](#)  
[Supporting document 1 \(Vision Document\)](#)  
[Supporting document 2 \(Vision Document\)](#)



<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bellway Strategic Land   Daniel Poole
<b>Personal reference number</b>	BHLF-AQTS-3289-F
<b>Full reference number</b>	BHLF-AQTS-3289-F/3/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Policy H2 provides the mechanism for the phasing, and we are concerned that it lists 12 sites, that could deliver homes quickly; but they will deliberately be prevented from doing so by the policy which states “Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. The following sites will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land</p> <p>32</p> <p>supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time” (underlining is my emphasis).</p> <p>5.38 We know that there will be a housing shortfall when the NPPF is amended, and even the Council has acknowledged that it would need to start an immediate review of the Local Plan, so we consider that this phasing needs to be removed, and all sites should be able to deliver new homes as soon as they are able.</p> <p>5.39 Paragraph 9.28 confirms the approach to housing distribution at the macro level, it states “the various settlements have been assessed and a sustainable settlement hierarchy is set out in Policy H3. The more sustainable ‘market towns’ have a higher overall housing provision with new allocations for an additional approximately 100 dwellings each. At the next level, the larger rural settlements, generally require new allocations of 90-100 dwellings each. The smaller ‘intermediate’ rural settlements have modest housing provision, as they do not benefit from significant commitments or completions.”</p> <p>5.40 Whilst we support the overall aims of Policy H3, we cannot support it entirely. Bishop’s Waltham is correctly identified as a Tier 1 settlement which has a greater amount of key services and facilities; and yet in our view, not enough development is being proposed around Bishop’s Waltham.</p> <p>5.41 It is clear from the number of sites submitted to and assessed by the Council that Winchester City Council can provide further opportunities to accommodate a meaningful portion of the anticipated sub-regional unmet need, including on land around Bishop’s Waltham, being the largest settlement in the District that falls within the PfSH boundary.</p>

	<p>5.42 As we have demonstrated in these Representations, Bishop’s Waltham, can and should be expected to deliver more homes. Paragraph 14.10 does not capitalise on the sustainability of the place and states that “it is expected that there is capacity for the development of about 765 dwellings in Bishop’s Waltham”.</p> <p>5.43 Bishop’s Waltham is a highly sustainable and high order settlement with an excellent range of facilities and services, as identified in the Settlement Hierarchy Report of November 2022 and can provide additional land for development.</p> <p>5.44 In our opinion, Bishop’s Waltham, which is ranked Tier 1 on the settlement hierarchy should be accommodating more growth in order to achieve sustainable patterns of growth.</p> <p>33</p> <p>5.45 We object to the fact that the ‘provision’ for new homes is in fact is made up almost entirely from existing completions (340), outstanding permissions (225), remaining local plan allocations (10), a windfall allowance (90) and very few homes on new sites (100).</p> <p>5.46 As we expressed in our Regulation 18 Representations, and as we reiterate here, the NPPF requires a step change, and a significant boost in the supply of new homes, and requires Councils to plan positively.</p> <p>5.47 The reliance on past completions, permissions, old allocations and an overly generous windfall allowance is not positive planning, and frankly, the allocation of only one site, offering only 100 potential dwellings is woeful for a settlement that is scored by officers to be second only to Winchester itself for its level of services and facilities, and overall sustainability as a settlement.</p> <p>5.48 Paragraph 14.9 of the Local Plan acknowledges that Bishop’s Waltham is “a thriving market town with a locally-based economy and strong community spirit”.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Form (with table)</a></p> <p><a href="#">Letter (commenting on policies - includes tables and pictures)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 1 \(Vision Document - Botley Road, Bishops Waltham\)](#)  
[Supporting document 2 \(pre-application advice from Historic England\)](#)

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bargate Homes   Jonathan Quarrell
<b>Personal reference number</b>	BHLF-AQTS-3288-E
<b>Full reference number</b>	BHLF-AQTS-3288-E/3/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H2 provides the mechanism for the phasing, and we are concerned that it lists 12 sites, that could deliver homes quickly; but they will deliberately be prevented from doing so by the policy which states “Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. The following sites will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time” (underlining is my emphasis).</p> <p>39</p> <p>6.40 We know that there will be a housing shortfall when the NPPF is amended, and even the Council has acknowledged that it would need to start an immediate review of the Local Plan, so we consider that this phasing needs to be removed, and all sites should be able to deliver new homes as soon as they are able.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Form (commenting on policies and evidence base)</a></p> <p><a href="#">Letter (commenting on policies and evidence base - includes pictures and tables)</a></p> <p><a href="#">Supporting document 1 (Map of site - Land at Winchester Road)</a></p> <p><a href="#">Supporting document 2 (Briefing note - Winchester Settlement Gap)</a></p>
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<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	BHLF-AQTS-328D-T
<b>Full reference number</b>	BHLF-AQTS-328D-T/1/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The consultation on the Regulation 19 commenced whilst the government were consulting on the revised NPPF. Whilst the outcome of the NPPF consultation is not fully known, the changes proposed align closely with the Government’s objectives as set out in the Written Ministerial Statement entitled “Building the homes we need”. The revised NPPF will become the policy mechanism to fulfil the objectives of improving affordability, promoting growth and building 1.5 million homes over the next five years. It is reasonable to assume that the core changes that go to the heart of these objectives will be adopted as drafted or in wording very close to the existing drafting, when the revised NPPF is published later this year.</p> <p>So while meeting the current requirement in full, the plan will not meet the housing needs of the District upon adoption of the NPPF changes, as drafted. The changes to the Standard Method will see the housing requirement for WCC increase significantly from 676 pa to 1099 pa (a 62% increase), triggering the need for an immediate review of the Local Plan should it be found sound at examination. It is therefore important that the plan provides an appropriate strategy and timetable to enable a timely review of the plan and meet this increased need; the requirements for which are set out in paragraph 33 of the NPPF (2023).</p> <p>Accordingly, Bargate Homes consider that the plan should therefore be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for a number of reasons, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing, which is considered further below.</p> <p>Bargate object to Policy H2: Housing Phasing and Supply, which seeks to phase the development of allocated greenfield sites until later in the plan period. This policy is not justified or effective in meeting the housing needs of the District and directing development to the most sustainable locations. It is contrary to the provisions of paragraph 60 of the NPPF. The phased approach to housing delivery outlined in Policy H2,</p>

while intended to create a more even housing trajectory over the plan period, places an artificial constraint on Winchester City Council's ability to meet the broader housing needs of the sub-region. By prioritising brownfield development and holding back the release of greenfield sites until 2030, the Council is effectively capping the contribution it can make to address the housing crisis. This strategy runs counter to the government's objective to significantly boost the supply of housing, as outlined in the NPPF and recent ministerial statement

Furthermore, the NPPF (paragraph 76) removes the obligation for local authorities to maintain an annually updated five-year housing land supply for decision-making when their plan is less than five years old. This diminishes the likelihood that the conditions under which early release of greenfield sites might be permitted—such as overcoming a housing land supply shortfall—will be met, rendering the phased approach ineffective under the current NPPF. Notwithstanding the proposals of the current incumbent government to reverse this recent change to the NPPF to re-establish the requirement for all local planning authorities, regardless of local plan status, to continually demonstrate 5 years of specific, deliverable sites for housing, it is considered that the WCC local plan should be updated to include a policy commitment to ensure a minimum 5-year supply (plus appropriate buffer) of deliverable sites across the district. This will both positively respond to the NPPF objective of significantly boosting the supply of homes (paragraph 60) and provide transparency to all parties when the Council will consider the early release of land, should phasing restrictions be maintained.

In essence, policies H2 and DEN1 unnecessarily restrict land supply at a time when housing demand is increasing, directly undermining the government's aim of boosting housing delivery and creating an uncomfortable situation for neighbourhood plans, necessitating work to allocate site(s) for housing that will not come to fruition in the in the 5-year period of the Local Plan. A mix of brownfield and greenfield development is crucial to ensure housing needs are met efficiently and sustainably, and therefore, the phased restrictions imposed by Policy H2 and DEN1iii should be deleted.

Finally, this phasing requirement also has implications for the viability and deliverability of land, which is often subject to agreements with landowners regarding timescales for planning permission and/or implementation. Although this is a commercial rather than a plan-making factor, it provides further justification for the removal of phasing requirements.

Bargate object to the Council's high level of reliance on windfall sites to deliver the District's housing need. Direct allocations provide the highest level of certainty, in terms of delivery and in terms of directing development to the most sustainable locations. In addition, past trends do not indicate future availability and even if sites do come forward, it is on an ad-hoc basis undermining infrastructure delivery. For these reasons,

	<p>which are explained in more detail in Bargate’s previous (Regulation 18) representations, it is not considered that a strategy based on a high plan-wide windfall allowance meets the tests of soundness set out in paragraph 35 of the NPPF.</p> <p>For the reasons set out below in Section 4 of these representations, a local plan allocation should made for Denmead to increase certainty and ensure that sustainable development is achieved.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Bargate Homes consider that the plan should be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for the reasons set out above, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing.</p> <p>Policies H2 and DEN1 unnecessarily restrict land supply and so the phasing restrictions imposed by Policy H2 and DEN1iii should be deleted.</p> <p>If WCC should consider that the phasing restrictions are justified and effective, then direct allocations to Denmead should be made and there should be clear policy commitments to ensure a minimum 5-year supply (plus appropriate buffer) of deliverable sites across the district.</p> <p>Lastly, the windfall allowance should be reduced, and the local plan should increase the number of direct allocations to provide certainty. For the reasons set out elsewhere in these representations, a local plan allocation should made for Denmead to increase certainty and ensure that sustainable development is achieved.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Bargate Homes consider that the plan should be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for the reasons set out above, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing.</p> <p>Policies H2 and DEN1 unnecessarily restrict land supply and so the phasing restrictions imposed by Policy H2 and DEN1iii should be deleted.</p> <p>If WCC should consider that the phasing restrictions are justified and effective, then direct allocations to Denmead should be made and there should be clear policy commitments to ensure a minimum 5-year supply (plus appropriate buffer) of deliverable sites across the district.</p> <p>Lastly, the windfall allowance should be reduced, and the local plan should increase the number of direct allocations to provide certainty. For the reasons set out elsewhere in these representations, a local plan allocation should made for Denmead to increase certainty and ensure that sustainable development is achieved.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	



<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on Policies and Evidence Base - includes pictures)</a> <a href="#">Letter (commenting on Policies and Evidence Base - includes pictures)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/8/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The above policy seeks to manage the delivery of residential sites to maintain a reasonable level of provision across the plan period and prevent all housing from being built out in the early years of the Local Plan.</p> <p>Policy H2 seeks to prioritise the delivery of Previously Developed Land (PDL) and phases these sites towards the earlier parts of the plan period. The policy also places phasing restrictions on allocated greenfield sites to prevent their delivery until later in the plan period. These sites will not be permitted in advance unless they are needed to overcome a district-level housing land supply shortfall or specific local need.</p> <p>The phasing policy presents an indicative phasing schedule to development sites being restricted to post April 2030. It is for this reason the policy H2 cannot be determined to represent a justified or effective strategy in line with the ‘tests of soundness’ in Paragraph 35 of the Framework. Gladman consider it is necessary for the Council to outline the number of homes that are anticipated to be delivered across the brownfield sites alongside the provision of a detailed site delivery trajectory which outlines the sites that will contribute to phases of delivery.</p> <p>While brownfield sites and previously developed land are prioritised to phasing towards the earlier part of the plan period, brownfield sites often have a long delivery lead time as supported in paragraph 9.24. This appears to be a conflicting approach and Gladman consider that housing delivery on greenfield site allocations should be encouraged in the immediate to medium term to support housing provision across the period.</p> <p>Indeed, the development of brownfield sites is complex and often subject to delay and deliverability issues due to unexpected physical constraints and contamination which requires significant remediation. There are proposed brownfield residential allocations which will be subject to significant demolition and clearance alongside major infrastructure requirements that are currently not phased to the latter part of the plan period, however are most likely to have a delayed building out period.</p> <p>Furthermore, many of the proposed brownfield sites are not subject to any planning applications or are at the early stages meaning that they are unlikely to deliver homes until later in the plan period.</p>

	<p>Gladman are in general support of the delivery of PDL and it is recognised that greenfield sites will be permitted ahead of their specified phasing where there is a district or locally identified level of housing supply shortfall. However, it is considered that the current phasing strategy may lead to an imbalance of housing provision over the plan period, with more housing delivered post-2030 than currently anticipated. The pressure for housing will be heightened post adoption of the emerging NPPF with the new increased housing requirement for WCC. Beyond a broad statement highlighting the prioritisation of PDL, there appears to be little justification of the proposed approach which conflicts with the</p> <p>Government's objective to significantly boost the supply of housing and that land is developed without unnecessary delay<sup>3</sup> .</p> <p>An alternative mechanism should be utilised to support the delivery of PDL that does not seek to restrict available and deliverable greenfield sites that have been deemed suitable for residential development and allocation. Indeed, these sites can contribute immediately to the identified housing needs of the districts, rather than having to rely on sites that are likely to experience delay in delivery.</p> <p>This phasing requirements highlighted in this policy will be further discussed in relation to Policy OT01: Land East of Main Road.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Supporting information (commenting on policies and proposed site)</a></p>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Croudace Homes
<b>Personal reference number</b>	BHLF-AQTS-328A-Q
<b>Full reference number</b>	BHLF-AQTS-328A-Q/3/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website.</p> <p>Strategic Policy H2 sets out that phasing will be applied to new greenfield housing sites allocated by the Local Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. 12 sites are identified to not be permitted in advance of April 2030 unless 'they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time'. These sites contribute a total of 655 dwellings to the housing requirement in the plan period. It is unclear why the phasing is proposed, however, it is believed it could be to delay the housing delivery trajectory from falling below the annual housing target until later in the plan period to ensure that a robust housing land supply is maintained and speculative applications are not made.</p> <p>3.18 Whilst it is appreciated that the Council may be seeking to take a brownfield first approach with the phasing, due to there being several complex brownfield sites (particularly within the city centre), it is considered that the proposed phasing could prevent much needed homes coming forward in the early years of the plan period.</p> <p>3.19 Paragraph 9.24 of the Regulation 19 Local Plan Consultation states that 'Brownfield sites, which often have a long lead in time in terms of delivery have been specifically phased towards the earlier parts of the Plan period...'. This rationale is not understood nor supported. Such a strategy could result in the under delivery of much needed homes in the early years of the plan period, which could result in speculative applications on unallocated and potentially unsustainable sites within the District. The 12 sites which are prevented from being permitted for development until after April 2030, are all considered to be unconstrained, sustainable sites in accessible locations which are well related to existing settlements. These would provide a positive and fundamental contribution towards the local housing need. It is therefore considered that the proposed phasing is overcautious, not justified and inconsistent with the Government's aim to deliver 1.5 million homes in the next 5 years or significantly boosting the supply of homes as required by Paragraph 60 of</p>

the NPPF. Further, as of 15 July 2024, 1,609 households were registered on Winchester City Council's Housing Register with the average wait time being 1 year and 5 months. As such, as currently drafted, the Regulation 19 Local Plan does not meet the current of future housing requirement and therefore fails tests of soundness as set out in Paragraph 35 of the NPPF.

3.21 To the author's knowledge, there have been no recently adopted Local Plans which apply a phasing approach which prevents sustainable development coming forward until later in the plan period. This is believed to be because such an approach would be found unsound at examination.

3.22 The 'Effect of phasing on Housing Trajectory' graph on page 218 of the Regulation 19 Local Plan, extracted below, details that without the proposed phasing there will be a significant boost in the delivery of housing from 2025/26 to 2031/32. This increased level of delivery is wholly in accordance with the Government's aim to deliver 1.5 million homes in the next 5 years and therefore this alone demonstrates why the proposed phasing set out in Strategic Policy H2 should not be allowed or found sound once the Local Plan is submitted for examination.

Further, it is highlighted that the Land at Southwick Road/School Road, allocated by Policy WK6, has the proposed suppressive phasing clause within the policy which is unjustified. Croudace Homes are committed to seeking to support and help achieve the Government's aim to increase housing delivery over the next 5 years and therefore emphasise that the proposed allocation could come forward in the near future which would further boost Winchester's housing supply in the short term. As set out in Section 4, there is an additional opportunity to allocate further land to the north and east of the proposed allocation to ensure the housing trajectory does not drop off after 2031/32.

3.24 As highlighted by Paragraph 70 of the NPPF, 'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'. Additionally, the PPG states that "strategic policy-makers should ensure there is not continued delay in meeting identified development needs". Therefore, this must be considered in terms of how achievable, available, suitable, and therefore deliverable sites - including greenfield sites - can be achieved at any point of the Plan period, and should not be prevented from coming forward until brownfield sites have been delivered.

3.25 In the light of the above comments, we urge the Council to remove the proposed phasing set out in Strategic Policy H2. Together with the removal of the proposed phasing and restriction of 12 greenfield sites coming forward before 2030, we suggest the Council seeks to allocate a range of further sites to boost and bolster the housing land supply throughout the plan period.

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

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/10/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates is concerned that draft Policy H2 fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost the housing land supply in the District.</p> <p>8.13 Furthermore, it is noted that the draft policy is inconsistent with Paragraph 60 of the NPPF which states that:</p> <p>“To support the Government’s objective of significantly boosting the supply homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (our emphasis)</p> <p>8.14 Section 6 of the Housing Topic Paper (July 2024), published in support of the emerging Local Plan, sets out the detailed justification for the phasing policy and how it intends to operate. The reasons sets out by the Council are summarised below:</p> <ul style="list-style-type: none"> <li>• Given the high level of commitments and existing Local Plan allocations, the only realistic ‘lever’ available to promote more housing in the later part of the Plan period, so as to level out housing delivery, is to use phasing to hold back new Local Plan allocations.</li> <li>• A large part of the housing commitments are greenfield sites of various types and sizes, as illustrated by the AMR information on housing commitments and recent brownfield / greenfield development. Reflecting on the emphasis on prioritising brownfield sites, the Regulation 18 Plan sought to hold back new greenfield allocations</li> <li>• Phasing new greenfield sites to hold them back until after 2030 coincides with Government requirements for water companies to reduce nutrient discharges (which is a constraint and cost within Winchester District).</li> <li>• It has become evident that the capacity of the Scottish and Southern Electricity Networks (SSEN) electricity grid poses a potential issue. Planning for long-term infrastructure needs is important to ensure that the community is resilient to future challenges and capable of accommodating growth without compromising quality of life.</li> </ul>



	<p>8.15 Against the above points, Wates is of the following view: The Council's attempt to create an artificial housing trajectory in order to 'level out housing delivery' fails to account for the variable nature of the housing market in the District. In the absence of a buoyant market, there is a risk of insufficient completions being achieved in the plan period. This in turn is likely to increase the affordability ratio in the District. Furthermore, the proposed policy does not account for site-specific circumstances which change over time and makes the phasing strategy less robust.</p> <ul style="list-style-type: none"> <li>• As set out in the WMS, brownfield development alone will not be enough to meet the existing unmet housing and commercial needs. The proposed principle of prioritising the delivery of development on brownfield sites during the early phases of the plan period is likely to deter and delay sustainable development in the District. It is considered that the most strategic way to meet the housing demands of the District is to undertake a 'housing first approach', where high quality housing in available and deliverable locations are encouraged. Furthermore, brownfield redevelopment is expensive and can lead to viability challenges, where the Council will have to inevitably make concessions on matters such as affordable housing provision or other infrastructure impacts.</li> <li>• The proposed upgrades to wastewater treatment works presents only part of the solution in reducing nutrient discharge. To drive forward nutrient neutrality in the District, localised mitigation solution must be encouraged to create wider sustainability benefits.</li> <li>• The concerns cited with regard to the capacity of the electricity grid should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy. The Government has been steering reforms to address the energy crisis with the Connections Actions Plan being published at the end of 2023 outlining the need slim down queue of viable progressing projects aligned to the country's strategic need. The Council must engage with energy providers and regulators and seek to secure wider and coordinated enabling works instead of delaying the vital delivery of homes.</li> </ul> <p>8.16 Council's proposed phasing to new greenfield housing sites allocated in the emerging Plan is contrary to the NPPF and will likely create a barrier in sufficient amount and variety of land to come forward and meet the critical need for housing.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>As set out above, it is considered that draft Policy H2 does not meet the test of soundness and is in direct conflict with the Government's ambition to boost the supply of homes as set out the WMS and draft NPPF. Therefore, it is recommended the draft Policy is removed from the emerging Local Plan.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on policies and evidence base)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/10/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant No  Positively prepared No  Sound No  Justified No  Compliant with the duty to cooperate Yes  Effective No  Compliant with national policy No</p> <p>8.12 Wates is concerned that draft Policy H2 fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost the housing land supply in the District.</p> <p>8.13 Furthermore, it is noted that the draft policy is inconsistent with Paragraph 60 of the Framework which states that:</p> <p>“To support the Government’s objective of significantly boosting the supply homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (our emphasis)</p> <p>8.14 Section 6 of the Housing Topic Paper (July 2024), published in support of the emerging Local Plan, sets out the detailed justification for the phasing policy and how it intends to operate. The reasons sets out by the Council are summarised below:</p> <ul style="list-style-type: none"> <li>• Given the high level of commitments and existing Local Plan allocations, the only realistic ‘lever’ available to promote more housing in the later part of the Plan period, so as to level out housing delivery, is to use phasing to hold back new Local Plan allocations.</li> <li>• A large part of the housing commitments are greenfield sites of various types and sizes, as illustrated by the AMR information on housing commitments and recent brownfield / greenfield development. Reflecting on the emphasis on prioritising brownfield sites, the Regulation 18 Plan sought to hold back new greenfield allocations</li> </ul>

- Phasing new greenfield sites to hold them back until after 2030 coincides with Government requirements for water companies to reduce nutrient discharges (which is a constraint and cost within Winchester District).
  - It has become evident that the capacity of the Scottish and Southern Electricity Networks (SSEN) electricity grid poses a potential issue. Planning for long-term infrastructure needs is important to ensure that the community is resilient to future challenges and capable of accommodating growth without compromising quality of life.
- 8.15 Against the above points, Wates is of the following view:
- The Council's attempt to create an artificial housing trajectory in order to 'level out housing delivery' fails to account for the variable nature of the housing market in the District. In the absence of a buoyant market, there is a risk of insufficient completions being achieved in the plan period. This in turn is likely to increase the affordability ratio in the District. Furthermore, the proposed policy does not account for site-specific circumstances which change over time and makes the phasing strategy less robust.
  - As set out in the WMS, brownfield development alone will not be enough to meet the existing unmet housing and commercial needs. The proposed principle of prioritising the delivery of development on brownfield sites during the early phases of the plan period is likely to deter and delay sustainable development in the District. It is considered that the most strategic way to meet the housing demands of the District is to undertake a 'housing first approach', where high quality housing in available and deliverable locations are encouraged. Furthermore, brownfield redevelopment is expensive and can lead to viability challenges, where the Council will have to inevitably make concessions on matters such as affordable housing provision or other infrastructure impacts.
  - The proposed upgrades to wastewater treatment works presents only part of the solution in reducing nutrient discharge. To drive forward nutrient neutrality in the District, localised mitigation solution must be encouraged to create wider sustainability benefits. The land at Brightlands presents an opportunity to reduce the nutrient runoff into the Test by ceasing intensive agricultural activities on the land and the use of associated fertilisers. Thereby, making nutrient neutrality achievable. While Wates notes that current environmental challenges need to be addressed pragmatically, it considers that there is no merit in delaying the delivery of allocated greenfield sites where it can be demonstrated that appropriate forms of mitigation can be employed on a site.
  - The concerns cited with regard to the capacity of the electricity grid should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy. The Government has been steering reforms to address the energy crisis with the Connections Actions Plan being published

	<p>at the end of 2023 outlining the need slim down queue of viable progressing projects aligned to the country's strategic need. The Council must engage with energy providers and regulators and seek to secure wider and coordinated enabling works instead of delaying the vital delivery of homes.</p> <p>8.16 Council's proposed phasing to new greenfield housing sites allocated in the emerging Plan is contrary to the Framework and will likely create a barrier in sufficient amount and variety of land to come forward and meet the critical need for housing.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Necessary modification to the Policy</p> <p>8.17 As set out above, it is considered that draft Policy H2 does not meet the test of soundness and is in direct conflict with the Government's ambition to boost the supply of homes as set out the WMS and draft Framework. Therefore, it is recommended the draft Policy is removed from the emerging Local Plan.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/10/H2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant No</p> <p>Positively prepared No</p> <p>Sound No</p> <p>Justified No</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective No</p> <p>Compliant with national policy No</p> <p>8.12 Wates is concerned that draft Policy H2 fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost the housing land supply in the District.</p> <p>8.13 Furthermore, it is noted that the draft policy is inconsistent with Paragraph 60 of the NPPF which states that:</p> <p>“To support the Government’s objective of significantly boosting the supply homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (our emphasis)</p> <p>8.14 Section 6 of the Housing Topic Paper (July 2024), published in support of the emerging Local Plan, sets out the detailed justification for the phasing policy and how it intends to operate. The reasons sets out by the Council are summarised below:</p> <ul style="list-style-type: none"> <li>• Given the high level of commitments and existing Local Plan allocations, the only realistic ‘lever’ available to promote more housing in the later part of the Plan period, so as to level out housing delivery, is to use phasing to hold back new Local Plan allocations.</li> <li>• A large part of the housing commitments are greenfield sites of various types and sizes, as illustrated by the AMR information on housing commitments and recent brownfield / greenfield development. Reflecting on the emphasis on prioritising brownfield sites, the Regulation 18 Plan sought to hold back new greenfield allocations</li> </ul>

	<ul style="list-style-type: none"><li>• Phasing new greenfield sites to hold them back until after 2030 coincides with Government requirements for water companies to reduce nutrient discharges (which is a constraint and cost within Winchester District).</li><li>• It has become evident that the capacity of the Scottish and Southern Electricity Networks (SSEN) electricity grid poses a potential issue. Planning for long-term infrastructure needs is important to ensure that the community is resilient to future challenges and capable of accommodating growth without compromising quality of life.</li></ul> <p>Against the above points, Wates is of the following view:</p> <ul style="list-style-type: none"><li>• The Council’s attempt to create an artificial housing trajectory in order to ‘level out housing delivery’ fails to account for the variable nature of the housing market in the District. In the absence of a buoyant market, there is a risk of insufficient completions being achieved in the plan period. This in turn is likely to increase the affordability ratio in the District. Furthermore, the proposed policy does not account for site-specific circumstances which change over time and makes the phasing strategy less robust.</li><li>• As set out in the WMS, brownfield development alone will not be enough to meet the existing unmet housing and commercial needs. The proposed principle of prioritising the delivery of development on brownfield sites during the early phases of the plan period is likely to deter and delay sustainable development in the District. It is considered that the most strategic way to meet the housing demands of the District is to undertake a ‘housing first approach’, where high quality housing in available and deliverable locations are encouraged. Furthermore, brownfield redevelopment is expensive and can lead to viability challenges, where the Council will have to inevitably make concessions on matters such as affordable housing provision or other infrastructure impacts.</li><li>• The proposed upgrades to wastewater treatment works presents only part of the solution in reducing nutrient discharge. To drive forward nutrient neutrality in the District, localised mitigation solution must be encouraged to create wider sustainability benefits.</li><li>• The concerns cited with regard to the capacity of the electricity grid should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy. The Government has been steering reforms to address the energy crisis with the Connections Actions Plan being published at the end of 2023 outlining the need slim down queue of viable progressing projects aligned to the country’s strategic need. The Council must engage with energy providers and regulators and seek to secure wider and coordinated enabling works instead of delaying the vital delivery of homes.</li></ul> <p>8.16 Council’s proposed phasing to new greenfield housing sites allocated in the emerging Plan is contrary to the NPPF and will likely create a barrier in sufficient amount and variety of land to come forward and</p>
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	meet the critical need for housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	As set out above, it is considered that draft Policy H2 does not meet the test of soundness and is in direct conflict with the Government's ambition to boost the supply of homes as set out the WMS and draft NPPF. Therefore, it is recommended the draft Policy is removed from the emerging Local Plan.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>



<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bargate Homes Ltd
<b>Personal reference number</b>	BHLF-AQTS-32Q1-Z
<b>Full reference number</b>	BHLF-AQTS-32Q1-Z/3/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>H2 DETAILED COMMENTS</p> <p>Pro Vision is acting on behalf of Bargate Homes, in regard to its specific interests in Coldon Common: SHELAA Sites CC04 (Land at Main Road) and CC05 (Lower Moors Road).</p> <p>Colden Common is a Large Rural Settlement in the Settlement Hierarchy (Strategic Policy H3) reflecting its level of daily facilities and other facilities (Settlement Review Background Paper August 2024), including Primary School and convenience retail, which are recognised as ‘key services’, and including amongst others, post office and doctors (‘other services’). Evidence confirms that this large village has a good degree of sustainability and is also close to the principal settlement in the district (Winchester), therefore, is a logical location for sustainable growth.</p> <p>For Colden Common 90 dwellings are allocated in the Local Plan. We note, however, that there is additional capacity for development; the available land is assessed to have a capacity of 551 homes (paragraph 6.33, DSSS1, 2024). The proposed allocation equates to less than a fifth of the capacity identified in the evidence base, which is not a positive planning response in the context affordability issues and unmet needs from neighbouring authorities.</p> <p>We support the inclusion of Land at Main Road ( Site C C04/Policy C C3). As noted, this is controlled by Bargate Homes, and there is commitment to deliver this development. Please refer to our more detailed comments on Policy CC3. However, we object to the proposed re-allocation of Clayfield Park (CC1) (SHELAA Site CC19), which we consider not be an effective policy decision. Please refer to our detailed comments on Policy CC1.</p> <p>We also object to the phasing of the supply of new homes, as set out in this policy and subsequent site allocation policies. This is not in accordance with the national policy objective to significantly boost housing supply and avoid delays in planning permissions being implemented to deliver new homes (NPPF 60). It is not justified in the context of affordability being one of the most significant issues in the district – and delivery of affordable homes “a major issue” and “a critical priority”(Local Plan paragraph 9.36) – plus significant levels of unmet need from neighbouring authorities. (Please also refer to our comments on Policy CC3).</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Our proposed modification is the deletion of a proposed allocation at Site CC19 (Clayfield Park) and its replacement with Site CC05 (Lower Moors Road), or inclusion of both sites. This proposed change is justified by the superior sustainability performance in the Integrated Impact Assessment of CC05 and its potential for affordable homes</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policies - includes pictures and tables)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Ibex Homes Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QE-M
<b>Full reference number</b>	BHLF-AQTS-32QE-M/3/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H2- Housing Phasing and Supply</p> <p>OBJECT</p> <p>2.13 To compound the situation the Council is proposing a phased delivery or 'stepped trajectory' within the Plan in order to be able to maintain a rolling 5-year housing land supply.</p> <p>2.14 Setting aside the concerns raised above in relation to the overall under-provision within the Plan it is clear from Appendix 5 of the Housing Topic Paper that a stepped trajectory is not required in this instance. The level of overprovision projected by the Council in the table at Appendix 5 clearly demonstrates that a flat trajectory would work (using the Council's figures) and therefore phasing is not required and does not represent a sound approach to Plan making in Winchester.</p> <p>2.15 Set in the context of the proposed new Standard Method and the substantial uplift to the LHN that it generates the Council should be taking every opportunity to deliver as much housing early in the Plan period as possible rather than actively seeking to restrict the flow of delivery. That is neither effective nor positive planning.</p> <p>2.16 Policy H2 should therefore be deleted because it is unsound.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on letter and proposed site)</a> <a href="#">Supporting information (Location Plan)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/6/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>To compound the situation the Council is proposing a phased delivery or 'stepped trajectory' within the Plan in order to be able to maintain a rolling 5-year housing land supply.</p> <p>4.48 Whilst a stepped trajectory can be a useful policy tool to address short-term housing delivery issues it is not usually required or indeed advised to be put in place where the housing supply sources identified by the Council are fully capable of meeting the minimum need identified. Setting aside the concerns raised above in relation to the overall under-provision within the Plan it is clear from Appendix 5 of the Housing Topic Paper that a stepped trajectory is not required in this instance. The level of overprovision projected by the Council in the table at Appendix 5 clearly demonstrates that a flat trajectory would work (using the Council's figures) and therefore phasing is not required and does not represent a sound approach to Plan making in Winchester.</p> <p>4.50 Furthermore, the phasing approach proposed in Policy H2 would artificially restrict early delivery of suitable greenfield allocations, which would fly in the face of clear Government policy to significant boost the supply of housing now. Set in the context of the proposed new Standard Method and the substantial uplift to the LHN that it generates the Council should be taking every opportunity to deliver as much housing early in the Plan period as possible rather than actively seeking to restrict the flow of delivery. That is neither effective nor positive planning.</p> <p>4.51 Policy H2 should therefore be deleted because it is unsound.</p> <p>4.52 Whilst the Housing Topic Paper refers to the 5-year housing land supply position and it includes Appendix 4 and 5 that show a trajectory (in graphical form) and a rolling 5-year housing land supply calculation the base data for both assessments in terms of the site-by-site delivery expectations are not provided.</p> <p>4.53 It is not therefore possible to interrogate the Council's housing delivery trajectory and rolling 5-year supply position to determine whether the approach it has taken is Sound and reflective of national policy. This is a major flaw in the evidence base and Harding Holding reserves the right to address this matter in further detail as and when the Council publishes the data.</p> <p>4.54 At the present point in time, it is clear that the Plan does not provide sufficient housing and that at least a further 3,125 dwellings must be planned for through the allocation of more sites.</p>

	4.55 It is possible that further allocations are required beyond this to address any deficiencies that may exist in the Council's housing trajectory and rolling 5-year housing land supply positions but that cannot be determined at the current point in time given the absence of the necessary data.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Supporting information (Map)</a>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bargate Homes Ltd
<b>Personal reference number</b>	BHLF-AQTS-32Q8-7
<b>Full reference number</b>	BHLF-AQTS-32Q8-7/3/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>H2 DETAILED COMMENTS</p> <p>Pro Vision is acting on behalf of Bargate Homes, in regard to its specific interests in Coldon Common: SHELAA Sites CC04 (Land at Main Road) and CC05 (Lower Moors Road).</p> <p>Colden Common is a Large Rural Settlement in the Settlement Hierarchy (Strategic Policy H3) reflecting its level of daily facilities and other facilities (Settlement Review Background Paper August 2024), including Primary School and convenience retail, which are recognised as ‘key services’, and including amongst others, post office and doctors (‘other services’). Evidence confirms that this large village has a good degree of sustainability and is also close to the principal settlement in the district (Winchester), therefore, is a logical location for sustainable growth.</p> <p>For Colden Common 90 dwellings are allocated in the Local Plan. We note, however, that there is additional capacity for development; the available land is assessed to have a capacity of 551 homes (paragraph 6.33, DSSS1, 2024). The proposed allocation equates to less than a fifth of the capacity identified in the evidence base, which is not a positive planning response in the context affordability issues and unmet needs from neighbouring authorities.</p> <p>We support the inclusion of Land at Main Road (Site CC04/Policy CC3). As noted, this is controlled by Bargate Homes, and there is commitment to deliver this development. Please refer to our more detailed comments on Policy CC3. However, we object to the proposed re-allocation of Clayfield Park (CC1) (SHELAA Site CC19), which we consider not be an effective policy decision. Please refer to our detailed comments on Policy CC1.</p> <p>We also object to the phasing of the supply of new homes, as set out in this policy and subsequent site allocation policies. This is not in accordance with the national policy objective to significantly boost housing supply and avoid delays in planning permissions being implemented to deliver new homes (NPPF 60). It is not justified in the context of affordability being one of the most significant issues in the district – and delivery of affordable homes “a major issue” and “a critical priority”(Local Plan paragraph 9.36) – plus significant levels of unmet need from neighbouring authorities. (Please also refer to our comments on Policy CC3).</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Our proposed modification is the deletion of a proposed allocation at Site CC19 (Clayfield Park) and its replacement with Site CC05 (Lower Moors Road), or inclusion of both sites. This proposed change is justified by the superior sustainability performance in the Integrated Impact Assessment of CC05 and its potential for affordable homes</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policies - includes tables and pictures)</a></p>



<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Croudace Homes (Alison Walker)
<b>Personal reference number</b>	BHLF-AQTS-32QZ-9
<b>Full reference number</b>	BHLF-AQTS-32QZ-9/3/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>To compound the situation the Council is proposing a phased delivery or ‘stepped trajectory’ within the Plan in order to be able to maintain a rolling 5-year housing land supply.</p> <p>4.45 Whilst a stepped trajectory can be a useful policy tool to address short-term housing delivery issues it is not usually required or indeed advised to be put in place where the housing supply sources identified by the Council are fully capable of meeting the minimum need identified.</p> <p>4.46 Setting aside the concerns raised above in relation to the overall under-provision within the Plan it is clear from Appendix 5 of the Housing Topic Paper that a stepped trajectory is not required in this instance. The level of overprovision projected by the Council in the table at Appendix 5 clearly demonstrates that a flat trajectory would work (using the Council’s figures) and therefore phasing is not required and does not represent a sound approach to plan making in Winchester.</p> <p>4.47 Furthermore, the phasing approach proposed in Policy H2 would artificially restrict early delivery of suitable greenfield allocations, which would fly in the face of clear Government policy to significant boost the supply of housing now. Set in the context of the proposed new Standard Method and the substantial uplift to the LHN that it generates the Council should be taking every opportunity to deliver as much housing early in the Plan period as possible rather than actively seeking to restrict the flow of delivery. That is neither effective or positive planning.</p> <p>4.48 Policy H2 should therefore be deleted because it is unsound.</p> <p>4.49 Whilst the Housing Topic Paper refers to the 5-year housing land supply position, it includes Appendix 4 and 5 that show a trajectory (in graphical form) and a rolling 5-year housing land supply calculation the base data for both assessments in terms of the site-by-site delivery expectations are not provided.</p> <p>4.50 It is not therefore possible to interrogate the Council’s housing delivery trajectory and rolling 5-year supply position to determine whether the approach it has taken is Sound and reflective of national policy. This is a major flaw in the evidence base and Croudace reserves the right to address this matter in further detail as and when the Council publishes the data.</p> <p>At the present time it is clear that the Plan does not provide sufficient housing and that at least a further 3,125 dwellings must be planned for through the allocation of more sites.</p>

	<p>4.52 It is possible that further allocations are required beyond this to address any deficiencies that may exist in the Council’s housing trajectory and rolling 5-year housing land supply positions but that cannot be determined at the current point in time given the absence of the necessary data.</p> <p>Colden Common specific comment</p> <p>4.53 It is Croudace’s firm opinion that the allocation CC1 should be removed from the plan and housing trajectory. It is a site carried forward from the previous Local Plan and is not available for delivery (48 units) due to the grant of permission for commercial development and an established caravan business remaining very much in business. There is no information available within the Local Plan evidence base that demonstrates to the Inspector that this site is likely to come forward in the next 5 years or even later into the plan period. Critically this is the only site that is required to come forward ahead of April 2030 due to the phasing element of Policy H2.</p> <p>4.54 Croudace make site specific representation in relation to Colden Common site below and it is clear from the Housing Topic Paper (July 2024), that Croudace’s site (CC03) has not progressed to allocation because the Parish Council decided that it preferred others and with no technical evidence base to support that decision, which the Council then accepted directly.</p> <p>“The Parish Council carried out public consultation on the potential of the remaining six sites around Colden Common and subsequently submitted a shortlist of three sites – CC02, CC04 and CC15 for further consideration. Taking into account the views of the local community and that CC03 and CC03b are slightly more sensitive in terms of their landscape impact, it is considered that a draft allocation for the sites C002, CC04 and CC15 represent a reasonable basis on which to proceed. Additional site CC03c was submitted for consideration as part of the Regulation 18 consultation. CC03 is not considered to offer any particular benefits either in isolation or in consideration with CC03 and CC03b, that would lead to its promotion in preference to the approach adopted in the Reg 18 Draft Local Plan in respect of Colden Common.”</p> <p>Development Strategy and Sites Proposed Submission 2024 Topic Paper.</p> <p>It stands that the City Council considered that four sites put forward to the Parish Council were suitable for allocation (CC03, C002, CC04, CC15) and that it was local parish event that saw CC03 removed from those sites put forward to meet the Council’s set figure of around 90 dwellings to Colden Common. If the figure was to be higher for Colden Common, which is Croudace’s position, this site would be a reasonable and logical addition to the plan as an allocated site or an alternative to the Council’s proposed allocation(s).</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	

<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on policies and evidence base)</a>  <a href="#">Supporting document 1 (Vision Document)</a>  <a href="#">Supporting document 2 (Map - Land east of Highbridge Road, Colden Common)</a>  <a href="#">Supporting document 3 (Indicative layout)</a></p>

<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Hannah Young
<b>Personal reference number</b>	BHLF-AQTS-32QC-J
<b>Full reference number</b>	BHLF-AQTS-32QC-J/2/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Council's spatial strategy, as set out through Strategic Policy SP2, is to direct housing growth to the three spatial areas: Winchester Town (5,640 dwelling); South Hampshire Urban Areas (5,650); and the Market Towns and Rural Area (3,850). A significant proportion of the District's housing need is being provided through three ongoing strategic allocations: Newlands (west of Waterlooville), North Whiteley and North of Winchester (Kings Barton) – with a combined capacity to deliver over 5,000 homes. In addition, as identified in the Local Plan Part 2, there are various smaller allocations which also need to come forward for development and have been included in this Reg. 19 Local Plan strategy. This "committed" development (homes built, permitted or allocates since 2018) amounts to around 11,300 dwellings and makes up a substantial part of the new Local Plan's housing requirement.</p> <p>Given the large quantum of committed development, the Spatial Strategy for the Local Plan Part 1 has been used as the starting point for the consideration of a Spatial Strategy through the IIA for the New Local Plan (Option 2). The Council also subsequently looked at an additional option which saw a reduced housing target for the South Hampshire Urban Areas and increased growth at Winchester Town and the Market Towns and Rural Areas (Option 1A).</p> <p>The Partnership for South Hampshire (PfSH) was originally formed in 2003; it is a partnership of district and unitary authorities, together with Hampshire County Council and the South Downs National Park Authority, working together to support the sustainable growth of the South Hampshire sub-region. WCC falls partly within the PfSH boundary.</p> <p>It is prudent to note that the new Government is placing more of an emphasis on regional planning in terms of authorities working together to plan for the needs of a region, with the Duty to Cooperate remaining a legal consideration in the preparation of Local Plans, despite the former Government indicating this would be</p>

	<p>abolished. The Labour Government has reinforced its messaging that authorities should be working together to meet the needs of a region. In her letter dated 30th July 2024 to all Local Authority leaders, Angela Rayner confirmed the continued operation of the duty to cooperate. The continued work of the PfSH is therefore supported and welcomed, to advocate and facilitate cross boundary planning.</p> <p>A previous assessment of housing need within the PfSH area established an overall level of need to 2036 of approximately 85,000 homes (PfSH Statement of Common Ground Update 2022). This was based on the standard method of calculating housing need and contains a 35% uplift applied by the Government to the twenty largest cities in England including Southampton. In line with emerging national policy, the Spatial Position Statement will not seek to apportion any unmet need from this uplift to neighbouring areas. The specific housing requirements for each PfSH local authority will be determined in the individual Local Plans with the appropriate housing figures and locations for development tested in local plan examinations. There is a current shortfall of around 14,500 homes being provided across the South Hampshire area (Table 1). This figure excludes the 35% uplift which was being proposed to the main urban area which would have applied to Southampton.</p> <p>Whilst this figure will continue to fluctuate, it is clear there is a very significant shortfall across the area and a need for the authorities to continue to work together to assist in meeting unmet need. Whilst only part of Winchester district is located within the PfSH area it is noted that this area does include Curdridge. The SoCG recognises that Winchester, along with Fareham, are looking to accommodate some of this additional need (making provision of some 2,350 homes). As noted above, it is our view there are suitable and deliverable sites within Winchester District, including the Land at Station Road, Curdridge promoted by Persimmon, that could contribute even further in meeting the unmet needs of the South Hampshire area.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Supporting document 1 (commenting on policies and proposed site)</a> <a href="#">Supporting document 2 (site deliverability statement)</a></p>
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<b>Policy/Evidence base document</b>	H2
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/43/H2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Bloor Homes do not support the phasing of housing delivery throughout the plan period. The draft policy wording currently states that ‘phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory.’ Bloor Homes considers this approach to be overly restrictive and fails to apply a flexible methodology that would safeguard the district’s future housing provision against unforeseeable shortfalls or downturns in the market arising from ongoing economic issues.</p> <p>It is clear from Winchester City Council’s trajectory as set out on page 218 and the text at paragraph 9.23 of the draft plan, that the general planned trend for housing provision in Winchester district is downward. In the face of the current stated level of unmet need in South Hampshire (particularly for Havant and Portsmouth), and the prospect of increased housing requirements being introduced under the revised standard method, the phasing of the new greenfield allocations in Winchester District into the second half of the plan period is unnecessary. To ensure an upward delivery trend across the plan period and beyond and to deliver a greater number of homes where they are needed - and to maximise opportunities to meet the unmet need in South Hampshire - provision should be made in this plan for additional strategic allocations which would promote and maintain higher levels of dwelling completions.</p> <p>According to paragraph 82d) of the National Planning Policy Framework (NPPF), "planning policies should be flexible enough to accommodate needs not anticipated in the plan". This is considered particularly applicable to the growth requirements and potential of Wickham. Equally, NPPF paragraph 11 highlights that ‘plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.’ Accordingly, introduction of phasing will constrain housing delivery, and runs counter to the NPPF requirement for in-built flexibility within local plans. In being flexible and responsive to changing market circumstances, prioritising the development of previously developed land runs the risk of restricting the housing pipeline, further exacerbating the affordability housing challenge in the district. Consequently, the policy wording should be revised to incorporate greater flexibility. and to not exclude other greenfield or other non-allocated deliverable sites from coming forward earlier in the plan period. This would also support the sustainability of settlements which would be frustrated if development is artificially held back.</p>

	<p>There is no justification for holding back sustainable sites for development, and delivering affordable homes, in an area of acute affordability issues. All sustainable opportunities for the provision of housing in the district should be taken to positively respond to the significant challenge.</p> <p>Additionally, the council's reliance on the delivery of higher annual housing numbers during the earlier part of the plan period is based on the delivery of a large number of outstanding planning permissions and windfall developments, many of which will be on brownfield sites. There is evidence from the current local plan (Central Winchester Regeneration Area and Station Approach Regeneration Area) that brownfield sites do not deliver when expected.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	No, I don't agree
<b>If no, please explain</b>	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
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<p><b>Have you submitted supporting information?</b></p> <p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on policies, policies map and evidence base)</a></p> <p><a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>



**WCC Response.**

The keys issues raised in representations on Policy H1 have been addressed in the Housing Topic Paper, July 2024 (SD10g) and the Housing Topic Paper Update, January 2025 (ED02), as follows:

- Phasing / Land Supply – SD10g Chapter 6, ED02 Chapter 6

**WCC Recommended Changes arising from representations:**

- Additional explanatory text to refer to a review of the Local Plan (PM2) and changes to Policy SP2 to commit to this review in policy (PM3).
- Changes to Local Plan Table 2 to reflect the approach agreed in the updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council (PM60).

Local Plan Reference or document	Policy H3 Spatial Housing Distribution	
Total Number of Representations received	61	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	22	18
Sound	4	42
Complies with Duty to Cooperate	19	22
<p><b>Summary of Representations</b></p> <p>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.</p> <p>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.</p> <p>There was a representation from a neighbouring LPA (Portsmouth) requesting that neighbours accommodate a portion of their unmet need – see comments under Policy H2.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/51/H3</b></p> <p>ANON-AQTS-3BSY-T/65/H3</p> <p>ANON-AQTS-3B4C-5/6/H3</p> <p>ANON-AQTS-3B8W-W/3/H3</p> <p>ANON-AQTS-3273-8/1/H3</p> <p>ANON-AQTS-3291-8/7/H3</p> <p>ANON-AQTS-3292-9/3/H3</p>		

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**

**Main issues raised in representations received in regulation 19 consultation**

- 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.

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/51/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>1. The area north of Winchester is proposed to accommodate approximately 2,400 new homes at King's Barton and Sir John Moore Barracks (SJMB), which amounts to 15% of the total Local Plan requirement and a park and ride site for 850 spaces. The Parish Council is concerned that the environmental impact of the scale of development proposed and that the in-combination effects of the development have not been fully assessed.</p> <p>2. The figure of 5,640 will include an element of the 1,900 allowance figure which has not been justified. The Parish Council is concerned that the approach taken by WCC creates unnecessary pressure to release land for development around Winchester to meet the potential unmet need from authorities who are located in a different housing market area. In particular, there is unnecessary pressure on the Sir John Moore Barracks (SJMB) site to deliver more homes than would otherwise be appropriate given the site constraints. Object to Policy H3. The impact of the allocation of the Sir John Moore Barracks (SJMB) for development should be assessed in the context of the wider area including the existing development at King's Barton. Object to Policy H3 the number of dwellings, 5,640 is not justified</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend the Policy by reducing the figure of 5,640 to take account of the removal of the 1,900 buffer figure.
<b>What is your suggested wording or text for the policy?</b>	Amend the Policy by reducing the figure of 5,640 to take account of the removal of the 1,900 buffer figure.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Letter (commenting on policies)</a></p>
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<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/65/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	It is very important to make efficient use of development land.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Sue Wood
<b>Personal reference number</b>	ANON-AQTS-3B4C-5
<b>Full reference number</b>	ANON-AQTS-3B4C-5/6/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	no comment
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	no comment
<b>What is your suggested wording or text for the policy?</b>	Please somewhere word the need for new developments not to be too close to existing villages as to absorb them
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Merlin Homes
<b>Personal reference number</b>	ANON-AQTS-3B8W-W
<b>Full reference number</b>	ANON-AQTS-3B8W-W/3/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H3 – Spatial Housing Distribution</p> <p>The level of housing directed to the settlements in the hierarchy needs to be reviewed, particularly those in the Market Towns and Rural Area category.</p> <p>The allocation in H3 is 3,825 dwellings with 1,570 reserved for the larger rural settlements and 610 new proposed allocations at Colden Common, Denmead, Kings Worthy, Swanmore and Wickham.</p> <p>We support the inclusion of an unmet 1900 dwelling allowance to cater for the identified current unmet needs in the Partnership for South Hampshire (PfSH) area.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Objection</p> <p>However, as noted at paragraph 4.56 of the Housing Topic Paper, Denmead is one of the settlements within the southern parishes that falls within the PfSH area. In our view therefore, there should be more emphasis on the contribution that settlements like Denmead should make to help meet the un met needs of the PfSH area. This approach would not conflict with the overall housing distribution strategy of the plan – which is to distribute development to a sustainable hierarchy of settlements based on the existing Local Plan (paragraph 4.48 of the Housing Topic Paper). This is because Denmead is already identified as a larger rural settlement second only to the market towns in the Market Towns and Rural Area category in the hierarchy.</p> <p>The table in paragraph 14.8 of the Reg 19 Local Plan says the larger rural settlements should each accommodate new sites for around 100 dwellings but notes actual capacity at all settlements is much higher at about 160 to 360 dwellings.</p> <p>We see no reason therefore why the allocation at Denmead should not be increased from 100 to at least 160 dwellings given its absolute locational advantages in being located within the PfSH area and to be able to contribute to the needs of the area in situ.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Mr & Mrs Painter
<b>Personal reference number</b>	ANON-AQTS-3273-8
<b>Full reference number</b>	ANON-AQTS-3273-8/1/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>3. Housing need and target 3.1 Policy SP H1 sets out a housing target of 15,115 for the district. This is based on:</p> <ul style="list-style-type: none"> <li>• a Standard Method calculation for a 20 year period stretching from 2020 to 2040 giving 13,563 dwellings</li> <li>• Assignment of 350 dwellings to the South Down National Park</li> <li>• Addition of 1900 homes to meet unmet needs in other areas</li> </ul> <p>3.2 The Council's use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years.</p> <p>3.3 On 30 July 2024 the Government published a Written Ministerial Statement and draft Standard Method and NPPF. These documents indicate a clear directions of travel in terms of national planning policy in relation to meeting housing needs. Paragraph 4 of the NPPF consultation document states that the government is "proposing a revised standard method which aligns more closely with the Government's aspirations for the housing market." In late September the Minister for Housing and Planning Matthew Pennycook warned Councils that he will intervene if councils produce plans with housing targets 'way under' their needs. The consultation on the new standard method and revised NPPF recently concluded and it is currently expected that an updated SM and NPPF will be published either toward the end of this year, or early next.</p> <p>3.4 Although the proposed revised Standard Method and NPPF are still at the consultation stage, and thus subject to potential change, the direction of travel is clear and recent appeal decisions have afforded some weight to it.</p> <p>3.5 The Government has helpfully published tables showing what the councils new housing need figures would be if the proposed Standard Methodology were used. In Winchester's case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, a difference of 423 and almost two thirds more than the existing. Applying this new Standard Method figure to the current plan period would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan.</p> <p>3.6 The Council would need to give consideration as to how much of Winchester's requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. However, even if the unmet needs commitment were dropped and a much higher figure</p>

	<p>were assigned to the National Park to deliver, Winchester’s housing requirement is still likely to significantly increase. 3.7 The Government has indicated that Councils with a “significant gap of over 200 dwellings per annum between the local planning authority’s revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF (Chapter 12, para 7). On the basis of the figures outlined above, this need to review the plan before submission would apply to Winchester. 3.8 In light of all of the above, it is submitted that the Council should take account of the Government’s new direction of travel and take time to carefully consider whether it should progress to submission, or instead return to an early stage of plan-making to revise its plan in accordance with the new NPPF before re-submitting. 3.9 In this context, the Council will need to keep an open mind regarding the supply of sites that it can draw upon to meet potentially higher housing numbers. This is addressed in the following section. 4. Sources of housing supply 4.1 Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized sites forward. 4.2 As noted in Section 2 it is considered that the Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Bishops Waltham. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. 4.3 There are medium sized sites available in these sustainable locations such as Bishops Waltham that could be brought forward quickly in a sensitive manner to help not only with housing delivery, but also re-enforce the vitality of the settlements and further the creation of quality places. One of these sites is the Land to the South of Tangier Gardens in Bishops Waltham. The non inclusion of this site as an allocation in the emerging plan is considered a flaw and unjustified. This, and other concerns, with the Bishop Waltham allocations are considered in more detail below.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting Document (commenting on policies)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/7/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>FH support the identification of 'Botley' within the South Hampshire Urban Area, and the recognition of the role of the settlement outside the District in influencing the Councils housing distribution. However, as Botley itself is not within the limits of WCC, it is considered that for Policy purposes, this should read 'Area of search East of Botley'.</p> <p>It is not sound that this area of search has not been further defined or assessed for allocations. FH do not agree with the statement at 9.26 which states 'There is limited scope for intensification or expansion of the strategic sites in the South Hampshire Urban Areas so only modest additional growth beyond existing commitments is proposed.' No consideration has been given to the area of search east of Botley, where significant land has been made available for strategic allocation to contribute to the wider PfSH needs. Given the pressing immediate need for housing, and the availability of land, there is no reason why the Council should not have given any consideration to identifying suitable sites within this location given the time elapsed since the publication of the PfSH statement.</p> <p>At the very least it is considered that this area of search should be spatially defined as part of H3, the Spatial Strategy and Policies Map, to confirm the direction of growth in line with the PfSH SPS.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The housing requirement and current unmet needs allowance of 1,900 should be substantially increased in order to maximise opportunities to meet the demonstrable unmet need within the PfSH (see earlier representations)</p> <p>The identified area of search 'East of Botley' should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now. The area of search as a whole should be spatially defined on the Policies Map.</p> <p>SHELAA site CU08 'Land at Botley Road, Station Hill' is an available, suitable and deliverable location for residential development of a minimum of 177 homes that should be defined in the Local Plan as an allocation.</p>
<b>What is your suggested wording or text for the policy?</b>	The housing requirement and current unmet needs allowance of 1,900 should be substantially increased in order to maximise opportunities to meet the demonstrable unmet need within the PfSH (see earlier representations)

	<p>The identified area of search 'East of Botley' should be explored immediately as part of this Local Plan and a wider choice of strategic allocations sites allocated for housing to meet the demonstrable needs that exist now. The area of search as a whole should be spatially defined on the Policies Map.</p> <p>SHELAA site CU08 'Land at Botley Road, Station Hill' is an available, suitable and deliverable location for residential development of a minimum of 177 homes that should be defined in the Local Plan as an allocation.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a></p> <p><a href="#">Supporting document 2 (Location Plan)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Illustrative masterplan)</a></p> <p><a href="#">Supporting document 5 (Access and Transport Report)</a></p> <p><a href="#">Supporting document 6 (Landscape and visual study)</a></p> <p><a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a></p> <p><a href="#">Supporting document 8 (Interim Ecology Assessment)</a></p> <p><a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a></p> <p><a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a></p> <p><a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a></p> <p><a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Peter Nicholas Homes
<b>Personal reference number</b>	ANON-AQTS-3292-9
<b>Full reference number</b>	ANON-AQTS-3292-9/3/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>H3 identifies that 1,570 new homes will be provided by the Larger Rural Settlements that fall within the MTRA. One of the Larger Rural Settlements is Denmead, a large village, close to Waterlooville with its extensive range of facilities and services. In the Settlement Hierarchy Background Paper it ranks 5th of the 49 settlements in Winchester District in terms of the facilities and services it provides. Denmead seems to be a logical sustainable place to accommodate significant future growth and this is recognised in the Settlement Hierarchy Background Paper. Given the sustainable nature of Denmead it would be expected that it would accommodate meaningful growth levels in the emerging plan, especially in the period 2024 to 2040.</p> <p>Disappointingly, the Council has limited its ambitions in relation to the Denmead which is only accommodating 330 new dwellings or 8% of the MTRA housing provision. Furthermore, Paragraphs 14.83 and 14.84 indicate that the Council is largely relying on completions, commitments and an existing allocation, to accommodate future growth in Denmead up until 2040, rather than delivering new sites. The Council has given the Parish a housing target of 100 new homes to accommodate through the Neighbourhood Plan process. Although Denmead is considered a sustainable location for accommodating growth it has been limited by Policies H2 and DEN1 to 100 new dwellings in the plan period. The housing is expected to be delivered through the Neighbourhood Plan process and phased to the latter part of the Plan period – i.e. after 2030. It is not clear why Denmead’s potential future growth has been so constrained, especially when there are sustainable sites on the edge of the village that could be brought forward in the plan period without compromising openness and closing the gap between Denmead and Waterlooville. Overall, the spatial approach in relation to Denmead is overly cautious and is not considered to be justified or positively prepared.</p> <p>Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized</p>



sites forward. The Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Denmead. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. There are medium and strategic sized sites available in Denmead that could be brought in a sensitive manner to help not only with housing delivery, but also to re-inforce the vitality of the settlement and further the creation of quality places. These sites include Furzeley Golf Course /Denmead Driving Range and Furzehill Farm.

Both sites fall within the settlement gap between Denmead and Waterlooville identified in the adopted local plan and re-inforced in Policy NE7 of the emerging local plan. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.” It is submitted that there are areas in the current settlement gap that do not contribute to openness and its undeveloped character and should not be included in the gap. Both the Furzeley Golf Course /Denmead Driving Range and Furzehill Farm sites and their contribution to the gap are considered in more detail below. Furzeley Golf Course/Denmead Driving Range (known as Furzeley Village) is a 34ha site in Denmead with potential capacity to accommodate a mixed use scheme involving at least 351 homes, extensive green infrastructure and other uses potentially including employment and community facilities. A map showing the extent and location of the site is set out in Appendix 1. Appendix 2 provides a very early Vision document for the site. The proposed extensive green infrastructure proposals set out in the Vision Document in Appendix II would help to reinforce and maintain the gap and facilitate improved public access and enjoyment of it. The scale of the development would be such that it would facilitate a holistic masterplanning approach and sustainable place making, rather than an on-going process of piecemeal development in the settlement. Furzeley Village should come forward as a strategic allocation in the emerging plan in the form of a settlement extension, rather than being left to the much slower, piecemeal and less certain Neighbourhood Planning process.

Furzehill Farm lies to the south of Denmead on Sheepwash Lane. It is a medium sized site south of Newlands Lane and Furzeley village site. A map showing the location and extent of the site is contained in Appendix 3. The site itself is highly developed with a number of buildings and hard-surfaced areas. It is also surrounded by development to the south west and north west of the site and northeast. Although it sits in the Denmead/Waterlooville settlement gap it cannot be considered to be contributing to its open and undeveloped nature. The site is available and, due to its size, could be delivered quickly. The site would assist with meeting high housing needs in the area and its development would not compromise the integrity of the Denmead/Waterlooville settlement gap..

In order to make the Plan sound the following modifications should be made to the emerging Plan policies:

	<ul style="list-style-type: none"> <li>• The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process</li> <li>• Furzeley Village site be included as a strategic mixed use allocation for Denmead</li> <li>• Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030</li> <li>• The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA DEN 22 &amp; 23 lying to the south and south west of Denmead Furzehill Farm</li> </ul>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>In order to make the Plan sound the following modifications should be made to the emerging Plan policies:</p> <ul style="list-style-type: none"> <li>• The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process</li> <li>• Furzeley Village site be included as a strategic mixed use allocation for Denmead</li> <li>• Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030</li> <li>• The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA DEN 22 &amp; 23 lying to the south and south west of Denmead Furzehill Farm</li> </ul>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	<p>Yes</p> <p><a href="#">Supporting document 1 (Commenting on policies and policies map)</a></p> <p><a href="#">Supporting document 2 (Vision document - Furzeley Village, Denmead)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/7/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>As outlined in paragraph 9.26, “The distribution of housing in Policy H3 is based on the sustainable development strategy (Policy SP2) and reflects the high level of existing commitments, especially within the three strategic sites: Newlands (West of Waterlooville), North Whiteley and Barton Farm”, thus acknowledging the sustainable location of North Whiteley for development. This is further reflected in the ‘Development Strategy and Site Selection’ (July 2024) document which forms part of the local plan evidence base. In paragraph 6.9, this highlights that “Whiteley scored slightly less than the market towns”, demonstrating the high number of services and facilities within the area.</p> <p>Clearly there is an issue of soundness with respect to the expression of the requirements, scale of housing requirement as well as its distribution associated with Winchester’s own needs and with the DtC, as explained in response to Policies H1 and H2. Policy H3 would need to be reviewed accordingly.</p> <p>Additionally, BSP object to the statement that the South Hampshire Urban Areas have already delivered significant growth over the years, and therefore there is limited scope for intensification or expansion. This position has not been fully or robustly tested through the IIA. It is simply unevidenced.</p> <p>Policy H3, as currently drafted, is proposing new allocations to accommodate only 500 homes (representing only 9% of the total housing distribution for South Hampshire Urban Areas). Yet it is clear that land adjacent to the urban areas, which is closely associated with the PfSH area, provides a sustainable location for growth. Policy H3 fails to reflect the housing need and geographical considerations associated with the PfSH area and joint working. It fails the test of soundness and DtC - as explained in response to Policies H1 and H2.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There should be greater recognition of the role of South Hampshire Urban Areas in the settlement hierarchy, and the spatial housing distribution should prioritise the allocation of new sustainable, edge of settlement, development opportunities.
<b>What is your suggested wording or text for the policy?</b>	It is suggested that the proposed number of housing allocations for South Hampshire Urban Areas be increased to reflect the DtC, overall housing requirement, and areas that are demonstrably sustainability for housing delivery.

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/38/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Refer to comments under policies SP2 and H1
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/11/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Vistry Partnerships have raised a number of concerns about the spatial housing strategy against Policy SP2 (Spatial Strategy and Development Principles) and H1. Please see those comments which are applicable here.</p> <p>The conclusions reached demonstrate that the District requires additional sites to be allocated in order to provide for sufficient housing. These representations have also made the argument for additional houses to be allocated at Winchester – including specifically the land at Pitt Vale. Land at Pitt Vale consists of approximately 23.7 hectares of undeveloped land on the south western edge of Winchester on the Romsey Road, at its junction with the A3090. The site is of open character and currently in use for agricultural purposes, mainly comprising managed grassland. To the immediate east of the site is Pitt Manor (a development of 200 homes) and the Pitt Manor Park and Ride. The sites topography is relatively flat at the southern section immediately adjacent to Romsey Road, with the land then sloping steadily upwards towards the north. At this higher point there are views across the town and towards open countryside beyond.</p> <p>These representations confirm the suitability, availability and achievability of the site, and further propose it is allocated within the draft Local Plan on the basis it will provide market and affordable homes which would go some way in supporting Winchester’s housing needs directly adjacent to the existing urban settlement, support Biodiversity Net Gain and provide high quality, beautifully designed, sustainable homes which reflect the surrounding context. Development of the site would embrace the 20-minute neighbourhood principles in alignment with the emphasis throughout the draft Local Plan. The site itself is free from constraints which would preclude development and can support a development capacity of approximately 350 homes together with landscaping, open space and a community centre. Furthermore, the site is available now and development could commence immediately, compared to other sites within Winchester town such as the Sir John Moore Barracks.</p>

Importantly, the site is well-located in sustainability terms with Winchester Town only 3.2km to the north east from the central part of the site, which can be reached within a 20-minute cycle. Winchester Railway Station is approximately 3.4km from the site and is located on the Southampton to London railway line. Both the Town centre and railway station are accessible by several bus services operating along Romsey Road with stops adjacent to the site. Indeed 6 buses an hour run past the site into Winchester Town centre and the Pitt Manor Park and Ride is immediately adjacent.

The site is well contained and is bound by dense vegetation along the north eastern site boundary which comprises a variety of mature trees and hedgerows. To the south west is the hamlet of Pitt. To the west and the northwest, the site is bounded by open fields. Running along the southern boundary of the site is Romsey Road, which provides direct access to the city centre and other key routes leading from the southern extent of the city. The South Winchester Golf Course is located south of this road.

Vistry Partnerships are proposing a residential-led sustainable community comprising:

- Up to 350 dwellings;
- A mix of dwelling sizes and types with a policy compliant provision of affordable housing;
- A community facility which could potentially include a café and flexible work/office space;
- Retention and enhancement of the existing public rights of way and permissive paths supplemented with new pedestrian and cycle links;
- A network of open spaces and play areas linked by safe and convenient pedestrian and cycle routes;
- Extensive public open space; and
- Surface water drainage works.

Key design considerations embedded within the concept masterplan scheme proposal include:

- To respect the integrity and setting of Pitt by ensuring separation between the hamlet and the main urban area of Winchester;
- To demonstrate how the site provides a sensitive extension following the traditional pattern of growth in the Town; and
- To create a new sustainable community which holds climate resilience at its heart, and which therefore incorporates the draft Part L Building Regulations and Future Homes Standards at the earliest opportunity, and which thrives on the principles of a 20-minute neighbourhood.

A Vision Document has been prepared which is submitted alongside these representations and includes our assessment of the site in its existing context; and a summary of the surveys undertaken to date which inform the illustrative masterplan. In addition, a Biodiversity Net Gain Assessment, Baseline Landscape and Visual Appraisal and Ecological Technical Note are submitted alongside these representations.

	<p>The NPPF requires that, to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. Land at Pitt Vale meets these requirements. Vistry Partnerships controls the land at Pitt Vale through an agreement with a single landowner to bring the site forward for development.</p> <p>Land at Pitt Vale should be considered an appropriate site for development being a sustainable location on the edge of Winchester Town. The site would help to meet the draft plan's strategic priorities and would provide a good location to provide a new community which could benefit from the 20-minute neighbourhood concept.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>A number of concerns have been raised regarding the plan period, reliance on previously allocated sites, lack of buffer, unmet need/duty to cooperate, NPPF transition, affordability and affordable housing and windfall allowance. The conclusions reached demonstrate that the Council require additional sites to be allocated in order to provide for sufficient housing across the plan period. As part of this, a clear case exists for additional houses to be allocated at Winchester. The land at Pitt Vale represents a suitable site for development in this context, and the Plan should be modified to include it as a new residential allocation.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies and evidence base - includes tables)</a>  <a href="#">Supporting document 1 (Affordable Housing Statement)</a>  <a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a>  <a href="#">Supporting document 3 (Vision Document 2)</a>  <a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a>  <a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a></p>



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Gleeson Land
<b>Personal reference number</b>	ANON-AQTS-3299-G
<b>Full reference number</b>	ANON-AQTS-3299-G/14/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Paragraph 60 of the NPPF (2023) states it is important that a sufficient amount and variety of land can come forward where it is needed. The Reg 19 plan heavily weights its housing allocations to the south of the district, but it is not clear to what extent this is anticipated to meet the unmet housing needs of the PfSH rather than the needs arising from existing communities in the southern part of the district.</p> <p>The ‘snapshot’ of the difference between the housing need in the PfSH area and identified housing supply (in adopted local plans and extant permissions) has not been less than 10,750 dwellings since the production of the first spatial position statement in 2016. Despite testing several alternative growth options through the IIA, none of these considered how much unmet housing need from the PfSH area could be accommodated. As it is likely a significant proportion of the housing delivered at the large strategic housing allocations in the south of the district will meet the needs of the PfSH more widely, it is important that local housing needs are not omitted from consideration and each settlement in the south, including Waltham Chase, should play its part in meeting the indigenous local needs of Winchester District. Without testing how much of the unmet housing needs of the PfSH could be met in Winchester, the spatial strategy underpinning the plan, and the quantum of growth for new housing is not positively prepared, justified or effective in the context of NPPF paragraph 35.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	A increased housing requirement is necessary to reflect the scale of unmet housing needs from the PfSH that the Council is able to accommodate sustainably.
<b>What is your suggested wording or text for the policy?</b>	N/A – a new housing requirement is required based on the modelling of further options in the IIA.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Vistry Group (land at Fairthorne Grange Farm and Brindle Farm, Curbridge, Whiteley)
<b>Personal reference number</b>	ANON-AQTS-32UE-R
<b>Full reference number</b>	ANON-AQTS-32UE-R/4/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>As per our representations on policies H1 and H2, provision should be made in this plan for additional strategic allocations to:</p> <ul style="list-style-type: none"> <li>• Ensure an upward delivery trend across the plan period and beyond</li> <li>• Deliver a greater number of homes where they are needed, and</li> <li>• To maximise opportunities to meet the unmet need in South Hampshire.</li> </ul> <p>In particular, as evidenced by the council's Strategic Housing and Economic Land Availability Assessment 2023, there is additional potential and capacity for an enlargement to North Whiteley. Vistry Group has promoted its land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road through earlier stages of plan making, including the preparation and submission of a Vision document which outlines the opportunity on this 23.8ha site adjoining North Whiteley. The site is referenced as CU32 in the Strategic Housing and Economic Land Availability Assessment 2023 as 'deliverable/developable' with an indicative capacity of 356 homes and the Vision document for Vistry presents a concept with the potential to deliver around 430 homes. The site is part of a wider area at North Whiteley that has seen recent infrastructure investment, and will see further investment, and the opportunities associated with this should be optimised. It is urged that this site CU32 be allocated now as part of a strategy that can deliver and maintain an upward housing trajectory and better address need arising in South Hampshire as part of the duty to co-operate. Vistry Group wishes to participate on this matter at the local plan examination.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The overall number of homes to be planned for in Winchester district must be increased and additional allocations made including Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road (North Whiteley extension) referenced as site CU32 in the Strategic Housing and Economic Land Availability Assessment 2023.
<b>What is your suggested wording or text for the policy?</b>	<p>No specific wording suggested.</p> <p>The overall number of homes to be planned for in Winchester district must be increased and additional allocations made including Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley</p>

	Road (North Whiteley extension) referenced as site CU32 in the Strategic Housing and Economic Land Availability Assessment 2023.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Shorewood Homes
<b>Personal reference number</b>	ANON-AQTS-32UB-N
<b>Full reference number</b>	ANON-AQTS-32UB-N/1/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The spatial strategy of the Plan is set out in Policy SP 2 with the spatial housing distribution addressed in Policy H3. Winchester Town is identified as making provision for about 5,640 new homes through a range of accommodation. The growth focus in Winchester Town is supported, especially in light of the new Government’s ambition to deliver 1.5 million new homes across the country in the next five years and Winchester’s historic role as an important sub-regional centre. However, it is considered that the Plan is not ambitious enough in relation to the level of housing growth to be accommodated in Winchester Town on small to medium sites.</p> <p>Winchester’s housing requirement is still likely to significantly increase. Para 70 of the current NPPF (Dec 2023) recognises that small and medium sized sites can make an important contribution to meeting the housing requirements of an area. Authorities are asked to support the development of windfall sites through their policies and decisions, especially within existing settlements. Para 72 expects there to be compelling evidence that they will be a reliable source of supply and realistic in nature. One of the largest recognised sources is windfall, providing 1,035 dwellings or 18% of the supply. The inclusion of this substantial windfall allowance has been justified through the 2021 evidence base document - Assessment of Windfall Trends and Potential. The Council have taken a very conservative approach to windfalls and the amount of supply expected to come forward over the plan period from Winchester Town windfalls. This level of cautious approach is not considered justified.</p> <p>Shorewood Homes support the inclusion of a high windfall allowance for Winchester Town. The detailed justification for the allowance is welcomed and it is considered that compelling evidence for their inclusion in Winchester Town’s supply is considered to exist. However, it is suggested that the Council has been overly cautious in its assumptions about the amount of supply that may come forward from windfall as the historic figures have shown a far higher annual contribution from this source. In terms of soundness and justification,</p>

	<p>Strategic Policies SP2, H1 and H3 should be strengthened by increasing the level of windfall allowance for the Town.</p> <p>Residential redevelopment is identified as significant component of the Winchester windfall supply and Shorewood's 3ha proposed residential redevelopment site at Pitt Manor, Romsey Road, Winchester for 48 net new homes is evidence that this form of development will continue to be a reliable source of supply for the Town. The Pitt Manor site is considered to be a suitable and deliverable site capable of bringing forward a high quality development in a highly sustainable location. On this basis, it is considered to be a suitable site for contributing towards Winchester Town's future windfall supply.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Strategic Policies SP2, H1 and H3 should be strengthened by increasing the level of windfall allowance for the Town.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/5/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Barwood Land objects to Policy SP2 as it is considered unsound. Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) for a full response and justification behind this objection.</p> <p>Barwood Land object to policy H3 and SP2 which both refer to the spatial strategy and distribution of housing. The Policies are not considered to be positively prepared, as they do not represent the most appropriate strategy to meet the area’s objectively assessed needs. In summary the approach continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer.</p> <p>Page 18 of the Council’s latest AMR 2022/23 includes a chart showing net dwelling completions across the district, and indicates the important contribution made by Market Towns and Rural Areas. This accounted for 28% of all completions in 2022/23, as opposed to Winchester City (where the majority of growth is directed) which makes up just 20%. As set out in paragraph 2.3 of the Local Plan Part 1; the Core Strategy was informed by a “settlement hierarchy” approach which ranked settlements, according to the availability and accessibility of a broad range of facilities, the settlement’s economic role and the environmental constraints to development. The Council’s Settlement Hierarchy 2022 notes that Otterbourne functions as one of several villages with a high degree of accessibility.</p> <p>A points-based scoring system was used to rank the settlements, with points being scored for the presence and accessibility of services and facilities. Different facilities also attracted different scores, according to their assumed contribution to a self-sustaining community. For example, a supermarket would receive three points, but a convenience store would only attract two points. The full methodology for the Council’s evidence broadly follows the deprivation index criteria on accessibility to local services. Whilst this is a sensible starting</p>

point, the approach omits accessibility to services and facilities within walking/cycling distance or via a short public transport journey. For example, an urban extension to Winchester, might be 5km from a facility on the other side of the settlement or 2.5km from the city centre whereas a Parish might omit facilities in adjacent parishes which in reality are within walking/cycling distance.

Sustainability can be promoted amongst smaller settlements by treating these as parts of a 'polycentric' settlement. This approach takes into account the propensity for people to travel to their nearest facility, even if that lies beyond their defined village. The sustainability of Otterbourne should be considered as part of a polycentric network of adjoining village. Given Otterbourne is close to other settlements it is accessible to a significant number of amenities and services within walking/cycling distance, which would be commensurate to that expected of a much larger settlement. The area could therefore accommodate a greater contribution to the overall housing requirement for Winchester.

Taking account of the wider accessibility of neighbouring villages, following the polycentric model, the score appointed to Otterbourne would have been significantly higher, with the ability to access a secondary school, GP surgery and railway station within cycling distance of large areas of the settlement. In reviewing the assessments and scores awarded, it is clear this consideration did not factor into the progressed hierarchy. If it had of been in respect of Daily Facilities/ Services, Otterbourne could have scored a full 20. For example, Otterbourne was awarded a 0 under pre-school/ nursery, despite there being various pre-school/ nursery opportunities in the vicinity which residents obviously utilise, including Bright Horizons and Otterbourne Day Nursery and Preschool on Otterbourne Hill. Otterbourne was also given a score of 0 for access to a train station, when Shawford train station is within a short c. 2km cycling distance; and indeed, proposals to potentially improve this link could be delivered as part of a future application. In reviewing further, Otterbourne was provided a score of just 2 points for "Other facilities or services", which should have been higher given the availability of facilities within the surrounding villages.

The evidence base therefore suggests that the Council should look to allocate a site capable of delivering at least 64 dwellings in Otterbourne to ensure that housing need is met on suitable and sustainable sites within the village (acknowledging this is without further considerations regarding the implications of the SM update) . In conclusion Barwood Land object to policy H3 which is considered unsound as it does not appropriately apportion growth to the most sustainable locations or consider how smaller settlements can (through a polycentric approach) actually provide access to a far broader range of services and facilities than simply assessing the sustainability of a location in terms of the settlement boundaries.

The evidence utilised to support the policy (including windfall figures for the individual smaller



	<p>settlements such as Otterbourne), is not appropriately apportioned and suggests this alongside the proposed allocation will not meet the proposed need under the existing SM, let alone with a more detailed understanding of the implications of the proposed SM update. The Policy is not considered to be positively prepared and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The evidence base therefore suggests that the Council should look to allocate a site capable of delivering at least 64 dwellings in Otterbourne to ensure that housing need is met on suitable and sustainable sites within the village (acknowledging this is without further considerations regarding the implications of the SM update) . In conclusion Barwood Land object to policy H3 which is considered unsound as it does not appropriately apportion growth to the most sustainable locations or consider how smaller settlements can (through a polycentric approach) actually provide access to a far broader range of services and facilities than simply assessing the sustainability of a location in terms of the settlement boundaries.</p> <p>The evidence utilised to support the policy (including windfall figures for the individual smaller settlements such as Otterbourne), is not appropriately apportioned and suggests this alongside the proposed allocation will not meet the proposed need under the existing SM, let alone with a more detailed understanding of the implications of the proposed SM update. The Policy is not considered to be positively prepared and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The Policy is not considered to be positively prepared and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a>  <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 2 \(Preliminary Ecological Appraisal \(PEA\)\)](#)  
[Supporting document 3 \(Preliminary Flood Risk and Drainage Review\)](#)  
[Supporting document 4 \(Heritage Appraisal\)](#)  
[Supporting document 5 \(Map - Compliant Site Access\)](#)  
[Supporting document 6 \(Local Plan Site Promotion - Transport\)](#)

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Vistry Group Ltd
<b>Personal reference number</b>	ANON-AQTS-32N1-W
<b>Full reference number</b>	ANON-AQTS-32N1-W/3/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	See section 2 and 3 of full response submitted to Planning Policy separately. In summary, whilst the commitment to meet some unmet need is commendable, WCC should be going further, particularly given the significant drop of in housing delivery towards the end of the plan period and the recognised and current significant unmet housing need within the South Hampshire area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	. In summary - as per our answer to Policy H1 and H2, WCC should consider now the allocation of further strategic sites in sustainable locations to help meet the need for housing towards the end of the plan period and to assist in meeting a greater level of the significant unmet need in the south Hampshire region. As set out in section 3 of our full response, the land at Raglington Farm, located east of Botley, is a ideal location for a new strategic housing allocation, having already been identified by the PfSH as a Growth Area. Additional information submitted.
<b>What is your suggested wording or text for the policy?</b>	See full written response. In summary - as per our answer to Policy H1 and H2, WCC should consider now the allocation of further strategic sites in sustainable locations to help meet the need for housing towards the end of the plan period and to assist in meeting a greater level of the significant unmet need in the south Hampshire region. As set out in section 3 of our full response, the land at Raglington Farm, located east of Botley, is a ideal location for a new strategic housing allocation, having already been identified by the PfSH as a Growth Area. Additional information submitted.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (Comments on housing requirement and opportunity at Raglington Farm)</a> <a href="#">Supporting Information (Raglington Farm site location plan)</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Thomas Hutchinson
<b>Personal reference number</b>	ANON-AQTS-329E-V
<b>Full reference number</b>	ANON-AQTS-329E-V/5/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H3 is not consistent with national policy; nor is it justified, having regard to the reasonable alternatives and evidence available to the Council.</p> <p>The amount of development proposed for the service centres in the rural areas is not justified anywhere in the Plan and the numbers for new housing are given to these settlements appear to be arbitrary. The supporting text (Para. 9.26) claims that the distribution of housing is based on the sustainable development strategy (Policy SP2), which splits the District into three spatial areas with a new homes requirement for each, yet Policy SP2 provides no reasoned justification for how much each spatial area is apportioned out of the total requirement for the District. No reference is made to the amount each of the larger settlements in the District should grow to meet their local housing needs and support their service base to ensure the ongoing vitality and viability of communities.</p> <p>Of the 3,850 homes apportioned to the 'Market Towns and Rural Area' spatial area there is no reasoned justification in the Plan as to how these are distributed amongst the various settlements. Insufficient attention is paid to the role of service centres providing a focus for growth in the rural areas and instead the total is proposed to be spread fairly widely across the whole rural area, relying mainly on windfall and the building out of existing commitments. Such commitments are often the result of the previous Local Plan and will soon be completed, leaving little scope for growth in the rest of the Plan period. The windfall allowance of 1,725 in Table H3 will be of little benefit to the settlements in the rural area, where there is much less potential for recycling of employment land for residential development.</p> <p>The rural settlement hierarchy in Policy H3 has three tiers yet it just provides no clear rationale for distributing numbers to each settlement and the policy itself just provides an overall number for each tier. There should be a number for each of the higher tier settlement rather relying on a phasing policy (Policy H2) to do this. Policies SP2 and H1 of the Plan set out a spatial strategy that requires steering new homes to the most sustainable settlements across the rural area so Policy H3 should provide numbers for each settlement that ensure that will happen.</p> <p>In deciding how growth should be distributed across the rural area, the strategy should focus growth on the most sustainable rural settlements with best public transport provision and largest range of facilities, as well</p>

as considering the scope for enhancing the range and quality of facilities and transport provision through new homes. The Settlement Hierarchy Background Paper to Inform the Local Plan (August 2024 Update) provides good evidence of how well served the settlement are by facilities and where the gaps are in terms of service provision, yet the spatial strategy hardly responds to any of this. No consideration seems to have been given in the spatial strategy to securing improvements to services such as more frequent bus services and better shopping provision which can benefit a rural hinterland that depends on it.

The higher tiers of settlement hierarchies are clearly the most sustainable locations for new development, offering residents a greater range of shops, services and facilities. In contrast, lower tier settlements have relatively fewer services and facilities, less infrastructure and are more isolated in terms of transport links. The settlement hierarchy in the Draft Plan fails to recognise the role of a service centre to a rural hinterland and how these provide service and transport hubs for people living away from the main urban area. This conflicts with Paragraph 31 of the NPPF which states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. The spatial strategy should consider the particular opportunities and constraints of each sustainable settlement in the hierarchy and use the evidence in the Settlement Hierarchy Background Paper to apportion a number that enables it to meet its social and economic objectives of sustainable development including meeting housing and community needs and improving public transport.

The Local Plan should be looking at the evidence and reflecting the character, needs and opportunities of the rural parts of the Borough and take account of the particular circumstances so that planning policies play an active role in guiding development towards sustainable solutions as set out in Paragraph 9 of the NPPF. The Local Plan should consider the social and economic benefits of proportionate growth (i.e. appropriate to the size, function and role of each settlements) to sustain their service base over the Plan period as well as considering the costs of not doing so. The Plan should have regard to the NPPF policy for rural housing which states in Paragraph 83: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." Furthermore, Paragraph 74 suggest that significant extensions to villages and towns can often be the best way of achieving the supply of large numbers of new homes, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. This should ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access. No indication is given in the Plan that paragraph 74 of the NPPF was ever considered; instead there appears to have been a deliberate intention to limit new housing sites to no more than about

	100 dwellings for all settlements in the rural area, no matter what their potential is for new housing to enhance the sustainability of the settlement for the benefit of all residents.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Provide an apportionment of growth that provides a number for each of the Market Towns and Larger Rural Settlements, as these are service centres for a rural hinterland that avoids people having to travel longer distances into the main urban area for services. Ensure that this number is based on an objective assessment of the opportunities and constraints in each settlement, having full regard to the Settlement Hierarchy Background Paper and does not rely on the windfall allowance set out in Table H3.
<b>What is your suggested wording or text for the policy?</b>	Based on our understanding of Denmead we would expect the policy to state a requirement as follows: DEN1 – Denmead Neighbourhood Plan, Denmead (200 dwellings)
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bewley Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-3BRU-N
<b>Full reference number</b>	ANON-AQTS-3BRU-N/1/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The Proposed Submission Local Plan (Regulation 19) 2020-2040 is predicated on the current annual housing requirement of 676 dwellings across the district per annum. If, however, the Local Plan is not submitted for examination prior to the ratification of the alterations to the standard methodology for calculating housing requirements as part of the proposed changes to the NPPF, then the emerging Local Plan will require modification and the need to address an annual housing requirement of 1099 dwellings, or a 62% increase on current housing requirements. If the latter occurs, it is assumed that there will be a need for a further public consultation on a modified Regulation 19 Local Plan. The comments below, therefore, address the Proposed Submission Local Plan (Regulation 19) 2020-2040 in its current guise.</p> <p>Bewley Homes Ltd supports the proposition that Denmead should have a new housing allocation in the Proposed Submission Local Plan (Regulation 19) 2020-2040, but objects to the low number attributed to Denmead of 100 new dwellings.</p> <p>There is support for the distribution of development across different spatial areas and the settlement hierarchy in Policy H3 which locates housing close to essential services, facilities and infrastructure, helping to achieve a sustainable pattern of development.</p> <p>Denmead is one of five Larger Rural Settlements with new housing allocations. These include Denmead (100 dwellings), Kings Worthy (120 dwellings), Colden Common (90 dwellings) and Wickham and Knowle (300 dwellings). The rationale for the distribution of dwellings among these five settlements is not at all clear. In the Settlement Hierarchy Report Update August 2024, Denmead scores 25 against the list of daily facilities/services plus other facilities, compared to 23 for Colden Common and Kings Worthy and 26 for Wickham.</p> <p>According to the Council's Open Space Assessment 2022, Denmead also has a far higher population of 6967, compared to 4716 for Kings Worthy, 4656 for Wickham and 3987 for Colden Common.</p> <p>The Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) July 2023 advises, among other things, on the theoretical capacity in number of dwellings that could be built in each of the listed settlements. Denmead could have 3984 dwellings built, compared to 3530 dwellings in Wickham, 992 dwellings in Colden Common and 676 dwellings in Kings Worthy.</p>



	<p>The Development Strategy and Site Selection Report July 2024 focused on sites within or adjacent to settlements within the SHELAA 2023. Even allowing for this analysis, there are 15 sites within or adjacent to Denmead's settlement boundary which could contribute 1,703 dwellings. This compares favourably to Wickham, which only has 6 sites adjacent to the site boundary contributing 957 dwellings. Denmead has a greater number of sites which could be developed for housing and which lack the constraints associated with many other rural sites within the district.</p> <p>It is understood that the existence of a delegated approval subject to a s.106 at Land at Ravenswood, Knowle for 200 dwellings forms part of Wickham Parish's housing allocation figure of 300 dwellings.</p> <p>It is considered that Denmead's new housing allocation of 100 dwellings in the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 is far too low relative to Wickham (100 dwellings compared to 300 dwellings in Wickham Parish). Denmead's score of 25 for facilities is comparable to Wickham's score of 26, but Denmead has a much higher population relative to Wickham (6967 compared to 4656) and a greater capacity of dwellings that could be built relative to Wickham (3984 compared to 3530) within the SHELAA 2023.</p> <p>It is incredulous, therefore, that Denmead's new allocation is only proposed to be a third of that of Wickham's in the Proposed Submission Local Plan (Regulation 19) 2020-2040, when it has a much larger population and greater dwelling capacity than Wickham. It is considered that Denmead's proposed new housing allocation should be increased to at least 200 dwellings, if not more. There is evidently a number of promoted sites within the Council's SHELAA (49 in total) so that Denmead could easily support a new 200 dwelling allocation.</p> <p>The AECOM Site Options and Assessment Report was published in July 2024 to inform the preparation of the new Denmead Neighbourhood Plan. This Report advises that there were 19 sites (out of 49 in total) potentially suitable for development and therefore appropriate for allocation within the neighbourhood plan, subject to the mitigation of constraints.</p> <p>Whilst the number of new dwellings required in the district is understood, and recognising the current planning application in Wickham Parish for Land at Ravenswood, Knowle, there is also the option to reduce the number of new dwelling allocation figures in Colden Common and Kings Worthy. This would enable Denmead's housing allocation to be increased to at least 200 dwellings. Neither of these settlements match Denmead when comparing their facilities scores, population or dwelling capacities. It is not clear why Kings Worthy should have a larger new housing allocation than Denmead.</p> <p>Denmead and Wickham were given the same housing requirement of about 250 dwellings in the adopted Winchester District Local Plan Part 2, so the divergence in housing allocation requirements in the Proposed Submission Local Plan (Regulation 19) 2020-2040 is bemusing.</p> <p>In summary, Denmead's housing allocation should be increased to at least 200 dwellings.</p>
<p><b>What modification(s) are necessary to make the</b></p>	<p>Denmead's housing allocation figure should be increased to at least 200 dwellings in the Proposed Submission Local Plan (Regulation 19) 2020-2040, by amending Policy H3 to reflect the uplift.</p>

<b>policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	Amend Policy H3 by increasing the New Allocations Proposed within the Larger Rural Settlements to at least 710 dwellings.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/9/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Catesby has raised a number of concerns about the spatial housing strategy in its representation on policies SP2 and H1, which indicates that a significant number of new housing allocations are needed throughout the settlement hierarchy.</p> <p>Catesby believes there is capacity to achieve this, particularly when noting the conclusions of the Settlement Hierarchy Review 2024. In Appendix A of that document, Winchester is awarded a score of '20' within the assessment of the availability of daily services. Yet, the next ten highest-scoring settlements (including Wickham) all receive a comparable score of 18. Then, in the total scoring presented on page 19 of the Settlement Hierarchy Review, Wickham is identified as the 5th most sustainable settlement (of a total of 50 settlements listed).</p> <p>A further concern is that Catesby's land interest (ref. WI19) has been excluded from a shortlist of sites presented in paragraph 6.28 of the Development Strategy and Site Selection report. In drawing up the shortlist, WCC appears to have excluded any site that does not directly adjoin the existing settlement boundary.</p> <p>This is not a reasonable approach, as the current settlement boundary at Wickham does not extend to include all the built-up areas at the settlement, particularly to the northwest. Catesby's land interests at Land South of Titchfield Lane adjoin the actual extent of the settlement's built form. Even if this were not the case, the methodologies supposedly applied in the IAA and the Development Strategy and Site Selection Topic Paper do not suggest that sites not directly adjoining the settlement boundary should automatically be excluded from further consideration.</p> <p>Therefore, the exclusion of site WI19 from the shortlist is arbitrary. This is particularly the case when it is noted that the site performs comparably to the alternatives that were shortlisted. Given the need to significantly increase the housing requirement and provide further additional allocations across the settlement hierarchy, the Council does not have the luxury of artificially ruling out sites in this manner. Policy H3 is neither positively prepared nor justified as matters of soundness.</p>
<b>What modification(s) are necessary to make the</b>	A number of concerns have been raised regarding the plan period, reliance on previously allocated sites, lack of buffer, unmet need/duty to cooperate, NPPF transition, affordability, affordable housing, and windfall

**policy legally compliant or sound?**

allowance. There is a need for many additional allocations for residential (large and small) across the settlement hierarchy, including within the Market Towns and Rural Area and at Wickham specifically. This is essential as any new strategic/large-scale allocations that the Council proposes (either to address unmet needs or in response to the revised Standard Method) will need to be balanced by allocating small/medium-sized sites to secure a consistent trajectory over the Plan period.

Indeed, sites available for development within the Market Towns and Rural Area are typically small/medium-sized in scale and are often self-contained. Existing settlements within this tier also include established services and social infrastructure, meaning that they provide opportunities to facilitate sustainable growth in the short term without reliance on new strategic infrastructure that (as demonstrated by the current Development Plan) has proved challenging to bring forward.

Whilst it is encouraging that the Plan now includes new allocations at Wickham (rather than simply relying on a permitted site at Knowle, a different settlement), the changing planning context described justifies additional allocations. Land South of Titchfield Lane (site ref WI19) provides one such opportunity. As detailed below, it is available, sustainable, and suitable for residential-led development. It should be allocated through modifications to the Draft Local Plan.

Land South of Titchfield Lane

Site Promotion and Deliverability -

Our client controls Land South of Titchfield Lane, which consists of approximately 13.9 hectares of agricultural land to the southeast of Titchfield Lane and southwest of the A334 to the northwest of the existing settlement. The subject land represents a sustainable and suitable site for residential development and is promoted for allocation in the emerging Local Plan. The land has been promoted through the 'call for sites' process, and is identified in the 'Strategic Housing Land Availability Assessment 2023' ('SHELAA'), and the Integrated Impact Assessment ('IIA') (2024), with site reference WI19.

Various technical surveys have been undertaken, feeding into masterplanning work undertaken on behalf of Catesby. This has confirmed that it is not subject to 'hard constraints' or major/long-term infrastructure requirements that would impede its development or undermine its viability. Accordingly, the site is considered 'deliverable' (as defined in the NPPF Annex) and can contribute to the supply of land for new homes within five years. Indeed, the technical assessments' conclusions are consistent with the high-level analysis in the SHELAA proforma for WI19, which scores the site 'green' for most categories. More details are provided below.

Site Characteristics -

As indicated, Land South of Titchfield Lane lies southeast of Titchfield Lane and southwest of the A334. The land is well contained by tree lines and vegetation and adjoins various existing uses. These include the curtilages of several large residential dwellings, alongside the Wickham Montessori School and the Park Place Pastoral Centre. The Park Place Farm Nursey and Tea Room is situated to the south, beyond which is

located the Wickham Park Golf Club. The site is, therefore, bound on three sides by existing built form and woodland.

With respect to its broader location, the site is proximate to the recently approved scheme, Land to the North East of Winchester Road, comprising 120 new homes (ref. 17/02615/FUL). This has extended the settlement to the northwest, further adding to the semi-residential character of this area. Consistent with 20-minute neighbourhood principles, Winchester Road provides a safe and lit pedestrian footway into the village with the site (measured from its centre) being approximately a 10-minute walk from the centre of the village. Additionally, the site is proximate to bus stops, which provide convenient access to the services located along 'The Square' within the heart of the settlement (as well as Fareham and the wide range of services located there).

Additionally, the character of the site will also change significantly as a result of Southern Water's proposals to build a main water main through its southern extent, and to develop a large above-ground pumping station and associated compound. This is part of the strategic 'Water Transfer and Water Recycling Project'. The 'industrialisation' of part of the site, resulting from the introduction of utilitarian infrastructure, creates a latent opportunity for betterment, which a landscape-led (residential) scheme at the site could support. This would represent an important public benefit and improvement for the settlement.

Concerning its features and constraints, as noted in the SHELAA 2023, the site is not constrained by prevailing statutory ecological designations. Moreover, having been utilised for arable farming, the land's existing biodiversity value is primarily restricted to its boundaries. It is noted that the trees located along the northeastern boundaries of the site (to Titchfield Lane and the A334) are subject to an Area Tree Preservation Order (TPO). As such, careful consideration has been given to the suitability of potential vehicular access points into the site.

Regarding flood risk, the site is located entirely within Flood Zone 1, which indicates that the site is not at material risk of fluvial flooding. The site is situated over 1km away from the boundaries of the South Downs National Park and there is no intervisibility between the site and this designation. The site is also not otherwise subject to any statutory landscape designations. Public views of the site are very limited, owing to the surrounding boundary features. It is notable that 'Park Place' to the southeast of the site is Grade II\* Listed, whilst the Little Park Mansions building to the west is Grade II Listed. These features are accounted for in the design approach set out in the appended Vision Document (Appendix 2).

Settlement Sustainability -

Wickham, falling within the 'Market Towns and Rural Area' ('Rural Area') categorisation in the adopted Local Plan Part 1 (LPP1) spatial strategy and being identified as a 'District Centre' (at Core Strategy Policy DS1), is recognised as a sustainable settlement. It can accommodate significant additional growth to address a share of localised and Plan-wide housing needs. Growth at Wickham is also necessary to bolster the vitality and viability of the services within the village. Indeed, for these reasons, the settlement was apportioned 250 dwellings to be delivered to help meet the LPP1 housing requirement.

The Draft Local Plan proposes to carry forward Wickham's elevated position within the settlement hierarchy. Therefore, taking account of the sustainability of the settlement as a whole, noting the pattern of expansion to the northwest of the village, and then accounting for the suitability of the site (as further explained in these representations), it is considered that Land South of Titchfield Lane should be allocated for high-quality residential development, comprising a mixture of house types and tenures, to meet housing needs. New homes should be provided alongside expansive new areas of accessible public open space, landscaping and associated green infrastructure, together with land for biodiversity enhancement and on-site nitrate mitigation.

Proposed Development -

Catesby proposes a landscape-led residential development alongside land for public open space, green infrastructure, biodiversity gain and nitrate mitigation. Details of the emerging design and the response to the site's characteristics and constraints are set out in the accompanying Vision Document (Appendix 2) and the alternative Concept Masterplan identified in Appendix 3. However, in summary, the proposals comprise;

- Up to 220 dwellings (noting that Catesby would have no objection to a smaller allocation, commensurate with the housing ultimately apportioned to Wickham via the Local Plan – a scheme for 90 to 100 dwellings is indicatively presented in Appendix 3);
- A mix of dwelling sizes and types, with policy-compliant levels of affordable housing being fully viable;
- Potential specialist accommodation for older people (such as a care home or an 'extra care' facility);
- A new safe vehicular access from Titchfield Lane (thereby avoiding the formation of a vehicular access off Wickham Road) and at a point which minimises arboricultural impacts;
- Enhanced pedestrian connectivity and access, including to the recently enhanced bus stops on Wickham Road, as well as in conjunction with existing PROW, thereby providing good pedestrian access to the centre of the village;
- High-quality open spaces and play areas, linked by safe and convenient pedestrian and routes;
- A scheme design which responds to landscape considerations and proximate heritage assets, including the possible route of a Roman Road;
- Buffers to allow for the safeguarding and enhancement of protected trees at the site's boundaries;
- Surface water drainage works;
- Measures to encourage efficient use of resources such as energy and water; and,
- Areas for biodiversity net gain (BNG), alongside nutrient mitigation measures.

As the accompanying Vision Document indicates, a key priority for the proposals is achieving effective pedestrian connectivity, both to public transport opportunities and the centre of the settlement. This will ensure successful integration with the existing village and provide future residents convenient access to the various services and amenities that Wickham benefits from. In turn, this will help ensure Wickham's vitality as an important District Centre focused on the vibrant Medieval square.

Conclusion -

	Land South of Titchfield Lane should be considered an appropriate site for development, being a sustainable location on the edge of Wickham. This Section of the representations demonstrates that the site would help meet the priorities identified in the Plan and provide a suitable location for a landscape-led development, consistent with the 20-minute neighbourhood concept.
<b>What is your suggested wording or text for the policy?</b>	A number of concerns have been raised regarding the plan period, reliance on previously allocated sites, lack of buffer, unmet need/duty to cooperate, NPPF transition, affordability and affordable housing, and windfall allowance. The conclusions demonstrate that the Plan requires significant additional allocations throughout the settlement hierarchy to provide sufficient housing. As part of this, a clear case exists for additional houses to be allocated to Wickham, reflecting the settlement's sustainability. Land South of Titchfield Lane represents a suitable site for development in this context, and the Plan should be modified to include it as a new residential allocation.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a> <a href="#">Supporting document 2 (Vision Framework)</a> <a href="#">Supporting document 3 (Concept Plan)</a> <a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	St Philips Strategic Land
<b>Personal reference number</b>	ANON-AQTS-329U-C
<b>Full reference number</b>	ANON-AQTS-329U-C/4/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>[REFER ALSO TO SEPARATE EMAIL VERSION OF THIS SUBMISSION]</p> <p>Strategic Policy H3 outlines the spatial distribution for this housing provision through the division of the district into three spatial areas: Winchester Town, the South Hampshire Urban Areas, and Market Towns and Rural Areas. We do not dispute this approach, as a matter of principle. However, the way this spatial strategy has then been translated into specified housing provision targets for different areas / settlements is unclear, specifically with regards to the provisions within the Market Towns and Rural Areas spatial area, and within that the Intermediate Rural Settlements.</p> <p>With specific regard to the Market Towns and Rural Area, the Consultation Plan provides for 3,825 dwellings broken down as follows: Market Towns (1,375 dwellings), Larger Rural Settlements (1,570 dwellings), Intermediate Rural Settlements (360 dwellings), and Remaining Rural Areas (520 dwellings). Paragraph 32 of the Framework states that local plans and spatial development strategies should be informed by a sustainability appraisal throughout their preparation. The Council’s Integrated Impact Assessment Report (July 2024) (“IIA”) was produced to meet this requirement and, whilst logically concluding that Intermediate Rural Settlements should be expected to provide less housing than larger settlements, it clearly fails to identify how the apportionment of development was expressly determined. Paragraph 9.28 in the supporting text to Policy H3 provides a breakdown as to the general level of development that would be expected in each tier of the settlement hierarchy based on settlement assessments that have been undertaken by the Council. However, from the IIA and the other supporting evidence base, it is unclear why, in reference to the hierarchy of settlements, both Market Towns and Larger Rural Settlements have been allocated approximately 100 dwellings and 90-100 dwellings each respectively – the same level of housing – whilst no specific allocation split is made for Intermediate Rural Settlements even though new housing allocations are proposed.</p>



We are aware that for Otterbourne, by way of example, Otterbourne Parish Council were asked by the Council to consider where some 50-60 dwellings could be accommodated. The Parish Council, in 2022, undertook a consultation exercise on this basis with the known SHELAA sites in the parish being considered. However, it is not known what the justification for or basis was for the assumption of 50-60 dwellings by the Council being provided in the village. This level of provision is also not reflective of the fact that all daily facilities/services cited in the Review of Settlement Hierarchy 2024 are available within the settlement or within either comfortable walking distance or reasonable cycling distance and as such, any development within Otterbourne would not need to rely on car travel to meet daily needs. The sustainability of Otterbourne has therefore been under recorded, making only 55 dwellings a significant under provision.

Furthermore, paragraph 68 of the Framework confirms that in providing an indicative figure at a neighbourhood level (as opposed to the authority as a whole), that figure should take account “factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.” We cannot see from the evidence base provided in support of the Consultation Plan that any specific ‘needs’ of the Intermediate Rural Settlements were considered.

Given the absence of this information / assessment, St Philips has undertaken its own Local Housing Needs Assessment focusing on the specific characteristics and needs of Otterbourne, and a review of the wider Intermediate Rural Settlements – refer to Appendix 2 of these representations [REFER TO SEPARATE EMAIL VERSION OF SUBMISSION]. This confirms that housing unaffordability is particularly pronounced in Otterbourne even in relation to Winchester District as a whole which has higher than the regional average house price to affordability ratios. Otterbourne has had no meaningful development in recent years which would contribute to affordable housing provision specifically and the supply of housing generally in order to address the affordability issues.

In view of the above, it is considered that the spatial distribution of housing, as identified in Policy H3, is unjustified and fails to explain or justify how the total housing provision for the Market Towns and Rural Area spatial area and specifically the Intermediate Rural Settlements, has been determined, and whether this has accounted for the specific needs of those settlements for additional housing or the scope for increased growth to be sustainably accommodated. We consider that there is demonstrably scope and need for the Intermediate Rural Settlement group as a whole, and Otterbourne specifically, to be assigned a greater level of housing growth and Policy H3 should be amended to reflect this.

The Consultation Plan proposes that, out of a total provision of 360 dwellings at this level of the settlement hierarchy, only 155 dwellings are to be delivered via planned allocations i.e. the remaining 205 dwellings are expected to come from windfalls. The Local Housing Needs Assessment for Otterbourne – Appendix 2 of these representations [REFER TO SEPARATE EMAIL VERSION OF SUBMISSION]– identifies that the five settlements within this category of the settlement hierarchy have delivered a total of 24 dwellings for the period 2020-2023. The Consultation Plan has been prescriptive in providing a breakdown of how and where this windfall provision is to be delivered; with a 20 dwelling windfall provision identified for each of the five Intermediate Rural Settlements. However, identifying specific windfall provision to each settlement would, firstly, seem at odds with the very nature of ‘windfall’ development where it is not possible to predict specifically where this development will come from and be located, and secondly, the evidence of past completions in these settlements would suggest that the level of windfall provision proposed is not reflective of past levels of completions.

A further reason why the Council should be seeking to identify specific sites for the delivery of housing, in the smaller settlements of the District, is that the evidence of past completions – refer to the Local Housing Needs Assessment provide at Appendix 2 [REFER TO SEPARATE EMAIL VERSION OF SUBMISSION] – is that windfall development largely comes forward in developments of 1 and 2 net additional dwellings, and almost exclusively providing less than 5 dwellings. Whilst this form and scale of development would be liable to Community Infrastructure Levy (CIL) contributions, they would not provide any affordable housing, or be of the scale to be able to provide any on-site community infrastructure, or contribute to off-site community infrastructure provision not covered by CIL.

In view of the above, it is considered that the windfall provision included for the five Intermediate Rural Settlements is unjustified and contrary to Paragraph 72 of the Framework and should be reduced or eliminated and replaced with specific sites for allocation, including Park Farm, Kiln Lane, Otterbourne. In the case of Otterbourne, the Hierarchy Review 2024 gives the settlement a score of 18 and therefore Otterbourne is characterised as an Intermediate Rural Settlement. However, the only daily facilities/services which are not contained within Otterbourne are a pre-school and main line train station. But these are in fact facilities that are available within the directly adjacent settlements of Otterbourne Hill and Shawford, providing a pre-school and main line train station respectively. The pre-school is just 800m south of Otterbourne accessed using direct cycle and footpath links, and the train station is just 3.0km away, a reasonable distance by cycle. Reflecting the accessibility of these facilities properly would mean that Otterbourne would score a further 4 points using the Council’s methodology, taking it to a total of 22 points. Using the Council’s methodology, this would change its categorisation in the hierarchy to a ‘Larger Rural Settlement’. As stated in paragraph 9.28 of the Consultation Plan, this category of settlement is proposed to accommodate larger allocations of up to 90-100 dwellings.

	<p>It is clear from the above that the Consultation Plan:</p> <ul style="list-style-type: none"> <li>• Does not accord with national planning policy, with the start of the Plan period not being the ‘current year’.</li> <li>• Fails to justify the distribution of development across the settlement hierarchy with specific regard to the level of housing allocated to the Market Towns and Rural Area.</li> <li>• Unjustifiably and unnecessarily places a heavy reliance on the delivery of windfall development at the Market Towns and Rural Area.</li> <li>• Fails to positively prepare for promoting the sustainable growth of Market Towns and Rural Areas by not considering the wider benefits of allocated development.</li> </ul> <p>The Consultation Plan has not been positively prepared in recognising the greater sustainability merits of Otterbourne and the need for additional housing, both in terms of quantum and mix, and for the provision of affordable housing in order to address the inherent housing characteristics and demographics of the village. Further development should be allocated to Otterbourne, specifically Park Farm, Kiln Lane. Otterbourne is also ideally located to contribute to meeting the unmet housing needs of the PfSH area. As such, Policy H3 and the associated Otterbourne housing delivery section of the Consultation Plan should be amended, to provide for additional development in Otterbourne.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The start date for the Consultation Plan period should be 2024.</p> <p>Table H2 of Policy H1: Housing Provision – Removal of completions prior to the current year and the allocation of additional sites for growth to account for the shortfall that would result, and a reduction in the windfall allowance to account for the elimination of specific windfall allowances from the Intermediate Rural Settlements.</p> <p>Table H3 to Policy H3: Spatial Housing Distribution – reduce the windfall allowance to account for the fact that historic trends for the Intermediate Rural Settlements show that windfalls will not deliver the quantum of housing envisaged.</p> <p>Policy H3: Spatial Housing Distribution – the level of specific allocations proposed should be increased generally in order to meet housing needs in full, and also reflective of the fact that Winchester District should be providing more housing generally, but specifically in the Intermediate Rural Settlements to account for the fact that windfall development in these locations will not deliver the level of housing envisaged.</p> <p>Housing Sources Tables for each Intermediate Rural Settlement – the windfall allowance should be deleted and replaced with specific additional allocations for housing, including Park Farm, Kiln Lane, Otterbourne (SHELAA site ref: OT04)</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#"><u>Letter (commenting on policies and evidence base - includes vision document)</u></a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	West Waterlooville Developments Limited (Grainger PLC)
<b>Personal reference number</b>	ANON-AQTS-3B5G-A
<b>Full reference number</b>	ANON-AQTS-3B5G-A/5/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	West Waterlooville Developments Limited (WWDL) fully supports the three spatial areas for housing development identified in Policy H1 (Housing Provision) and the settlement hierarchy outlined under Policy H3.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting Document (Site Delivery Statement - Berewood)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/32/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Whilst Bloor Homes agrees with the principle of supporting the delivery of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area, it is considered that there is scope to provide additional growth in the Market Towns and Rural Areas, including Wickham, to both support the continued sustainability of settlements in these areas but also to provide for the identified shortfall in provision arising in the PfSH area.</p> <p>In light of this substantial increase in the identified shortfall in housing in the PfSH area, the housing requirement and distribution for Winchester District should provide additional flexibility, acknowledging established linkages with neighbouring authorities.</p> <p>Bloor Homes acknowledges that Winchester Town is the highest tier in the settlement hierarchy and therefore additional growth should be provided there, with the South Hampshire Urban Areas continuing to provide growth at the consented major development areas.</p> <p>However, there needs to be a balance between what is provided in these areas and what is provided elsewhere in the district.</p> <p>Paragraph 9.26 identifies that there is limited scope for expansion of the South Hampshire Urban Area with paragraph 9.27 recognising that whilst Winchester Town is the most sustainable settlement in the district, it is heavily constrained, leading to the need to identify new allocations alongside some existing allocations that are to be carried forward. Given these constraints, there is an opportunity for any additional growth needed to be accommodated at the smaller but sustainable settlements such as Wickham. This is in line with the Vision which recognises that market towns and large villages need an appropriate level of growth to continue to thrive.</p> <p>A mixed approach to site allocations is necessary to achieve sustainable development and deliver the development required at the locations where it is most needed. This is consistent with the NPPF which identifies the need to increase the number of medium sized sites coming forward (paragraph 70).</p> <p>There is an opportunity for further housing need to be accommodated in Wickham through the extension of draft Policy WK5 Land at Mill Lane to include land to the north, which could potentially provide around an additional 60 homes.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Whilst Bloor Homes agrees with the principle of supporting the delivery of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area, it is considered that there is scope to provide additional growth in the Market Towns and Rural Areas, including Wickham, to both support the continued sustainability of settlements in these areas but also to provide for the identified shortfall in provision arising in the PfSH area.</p> <p>In light of this substantial increase in the identified shortfall in housing in the PfSH area, the housing requirement and distribution for Winchester District should provide additional flexibility, acknowledging established linkages with neighbouring authorities.</p> <p>Bloor Homes acknowledges that Winchester Town is the highest tier in the settlement hierarchy and therefore additional growth should be provided there, with the South Hampshire Urban Areas continuing to provide growth at the consented major development areas.</p> <p>However, there needs to be a balance between what is provided in these areas and what is provided elsewhere in the district.</p> <p>Paragraph 9.26 identifies that there is limited scope for expansion of the South Hampshire Urban Area with paragraph 9.27 recognising that whilst Winchester Town is the most sustainable settlement in the district, it is heavily constrained, leading to the need to identify new allocations alongside some existing allocations that are to be carried forward. Given these constraints, there is an opportunity for any additional growth needed to be accommodated at the smaller but sustainable settlements such as Wickham. This is in line with the Vision which recognises that market towns and large villages need an appropriate level of growth to continue to thrive.</p> <p>A mixed approach to site allocations is necessary to achieve sustainable development and deliver the development required at the locations where it is most needed. This is consistent with the NPPF which identifies the need to increase the number of medium sized sites coming forward (paragraph 70).</p> <p>There is an opportunity for further housing need to be accommodated in Wickham through the extension of draft Policy WK5 Land at Mill Lane to include land to the north, which could potentially provide around an additional 60 homes.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Whilst Bloor Homes agrees with the principle of supporting the delivery of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area, it is considered that there is scope to provide additional growth in the Market Towns and Rural Areas, including Wickham, to both support the continued sustainability of settlements in these areas but also to provide for the identified shortfall in provision arising in the PfSH area.</p> <p>In light of this substantial increase in the identified shortfall in housing in the PfSH area, the housing requirement and distribution for Winchester District should provide additional flexibility, acknowledging established linkages with neighbouring authorities.</p>

	<p>Bloor Homes acknowledges that Winchester Town is the highest tier in the settlement hierarchy and therefore additional growth should be provided there, with the South Hampshire Urban Areas continuing to provide growth at the consented major development areas.</p> <p>However, there needs to be a balance between what is provided in these areas and what is provided elsewhere in the district.</p> <p>Paragraph 9.26 identifies that there is limited scope for expansion of the South Hampshire Urban Area with paragraph 9.27 recognising that whilst Winchester Town is the most sustainable settlement in the district, it is heavily constrained, leading to the need to identify new allocations alongside some existing allocations that are to be carried forward. Given these constraints, there is an opportunity for any additional growth needed to be accommodated at the smaller but sustainable settlements such as Wickham. This is in line with the Vision which recognises that market towns and large villages need an appropriate level of growth to continue to thrive.</p> <p>A mixed approach to site allocations is necessary to achieve sustainable development and deliver the development required at the locations where it is most needed. This is consistent with the NPPF which identifies the need to increase the number of medium sized sites coming forward (paragraph 70).</p> <p>There is an opportunity for further housing need to be accommodated in Wickham through the extension of draft Policy WK5 Land at Mill Lane to include land to the north, which could potentially provide around an additional 60 homes.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/13/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>As outlined in paragraph 9.27, “Winchester City is the most sustainable settlement in the district, albeit also heavily constrained.” This is further reflected in the ‘Development Strategy and Site Selection’ (July 2024) document which forms part of the local plan evidence base. In paragraph 6.2, this highlights that “Winchester is the highest rated settlement hierarchy review as it contains a large number of facilities and services, including ‘higher order’ facilities and services they provide, so Winchester is at the top of the settlement hierarchy and is the most sustainable development location in the district.”</p> <p>In this context, it is further highlighted that the 2023 SHELAA identified 34 sites within or adjacent to the boundary of Winchester City. Together, these sites have an estimated capacity of 5,589 homes.</p> <p>By contrast, Policy H3, as currently drafted, is proposing new allocations to accommodate only 1,410 homes (representing 25% of the total housing distribution for Winchester City). The remainder of the distribution comprises the following:</p> <ul style="list-style-type: none"> <li>- Windfall allowance of 1,035 (18%)</li> <li>- Net completions in or adjoining settlements of 879 (16%)</li> <li>- Outstanding permissions (excluding Barton Farm) of 328 (6%)</li> <li>- Barton Farm allocation carried forward of 1,541 (27%)</li> </ul> <p>The housing distribution for Winchester City, despite being recognised as the principal focus for growth in the district, is primarily comprised on existing sites, allocations, an overreliance on Windfall sites and the allocation at Barton Farm. Notwithstanding the significant growth potential in and around Winchester City identified in the SHELAA, this is not reflected in the proposed housing distribution.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	In recognition of the role of Winchester City in the settlement hierarchy, the housing need and the spatial housing distribution, full use of available opportunities for the allocation of new sustainable, edge of settlement, development opportunities.
<b>What is your suggested wording or text for the policy?</b>	It is suggested that the proposed number of housing allocations for Winchester City be increased to address the overall housing requirement, pressure on the areas within South Hampshire to meet the unmet need of

	that sub-region and therefore pressure on the City to address local needs, also reflecting the areas sustainability for housing delivery.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TT-6
<b>Full reference number</b>	ANON-AQTS-32TT-6/2/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Taylor Wimpey Strategic Land (TWSL) support the principle of the Draft Plan’s spatial strategy for distributing housing across a hierarchy of settlements based on their relative sustainability. However, the Plan fails to achieve that for the reasons set out below, and as such should be revised in order for it to be found sound.</p> <p>The distribution proposed in the Draft Plan is unevenly weighted in favour of focusing the majority of new development in urban areas, with just 4,250 (25%) to be accommodated in the Market Towns and Rural Area (MTRA). This pattern of development is likely to lead to a growing concentration of services in the existing, larger, urban areas to the detriment of investment in the settlements across the rest of the District (the MTRA). This pattern of growth is also unsustainable because the likely gradual degradation of rural services will lead to a high number of people travelling to the larger urban areas to access services and facilities. This will give rise to an increase in the number of vehicles on the road with associated localised effects on air quality, ground water quality and ecology. It will also lead to less socially cohesive communities, as people will be less likely to venture out if there are reduced services to access.</p> <p>An increase in the housing requirement of the MTRA’s as a result of increasing the Plan period, accounting for unmet needs and a suitable buffer (see out comments in relation to Policy H1) would lead to far more sustainable pattern of development across the District and provide the population to support existing and future services in the less urban / rural locations. There is also an overreliance on existing, large and often complex allocations. The two allocations relied on in the South Hampshire Urban Areas are long standing allocations being developed by consortia and that have both been subject to delays during their respective build out periods as a result of issues associated with their size. It is not unlikely that the remaining phases will be subject to the same slow delivery pace, particularly whereby consortium member payment of the costs associated with the on-going delivery of large-scale joint infrastructure may need to be renegotiated.</p>

	<p>We also have concerns around the imbalanced spatial distribution of housing across the MTRA. Policy SP2 provides housing figures to be delivered in Winchester, South Hampshire Urban Areas, and the MTRA – for the MTRA about 3,850 homes. Policy H1 then repeats this distribution, although the MTRA figure is 3,825, not 3,850. Policy H3 then splits the 3,825 homes in the MTRA into commitments and new allocations spread between five market towns, five larger rural settlements, five intermediate settlements, and the remaining rural area. The five larger rural settlements are Colden Common, Denmead, Kings Worthy, Swanmore and Wickham.</p> <p>Policy H3 proposes new allocations of 610 homes to the five larger rural settlements. The table on page 389 of the Draft Plan states that each of these settlements were asked to identify new sites for 90-100 homes – at most this would add up to 500 new homes, not 610. The 610 total proposed allocation figure is skewed because it includes an allocation of 200 dwellings at Knowle (Policy KN1 – Ravenswood). Knowle is a small settlement in the rural area of Wickham Parish, not at Wickham. This undermines the spatial strategy which bases housing distribution on the sustainability of settlements, not parishes. There is also uncertainty around the deliverability of KN1. It should not be relied upon to meet the housing needs of the larger rural settlements. Of the remaining 410 dwellings, only 290 will deliver open market and affordable housing. This is because the 120 dwellings at two allocations in Kings Worthy (KW1 and KW2) are for older persons housing.</p> <p>We submit that the Plan should be amended so that its allocations better reflect its spatial strategy. The 200 home allocation at Knowle should be deducted from the larger rural settlements total, leaving 410 dwellings. To help address this shortfall, we suggest that a new greenfield allocation of land for 250 homes at Land at Springvale Road, Kings Worthy (ref. KW05) is included in the Plan.</p> <p>As set out elsewhere in these representations, site KW05 scored higher in the Integrated Impact Assessment than those sites allocated in the Draft Plan at Kings Worthy. KW05 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant constraints and lies adjacent to the settlement policy boundary. As such, it should be allocated for development to help address the imbalanced distribution of housing across the District identified above and the higher overall housing requirement (see comments in relation to Policy H1), and Policy H3 should be amended accordingly.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H3 should be amended to increase the amount of new allocations across the MTRA. See response to question below.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H3 should be amended to uplift the amount of new allocations across the MTRA to help meet the increased housing requirement set out in our response to Policy H1. We would welcome the opportunity to discuss the appropriate figure and how this is distributed across the MTRA at the Examination Housing hearing session. Land at Springvale Road, Kings Worthy (KW05), should be allocated for residential development to help meet some of this requirement.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting information (Illustrative concept masterplan)</a>  <a href="#">Supporting information (Copy of letter re: Land at Springvale Road, Kings Worthy)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/18/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor supports the overall vision however, expresses concerns as to how the vision can be achieved through the current proposed spatial distribution strategy. Bloor considers that the overall housing requirement should be increased in order for the plan to be deemed sound and that the distribution of this housing requirement should be revised to ensure consistency with the evidence base.</p> <p>Bloor raises no objection to a spatial strategy that delivers a balanced approach to housing that meets the needs of the Authority as a whole, however has concerns regarding the conflicts of Strategic Policy SP2 with the wider R19 LP objectives and policies and how the spatial strategy has been developed. The spatial strategy insufficiently prioritises Winchester Town and commits disproportionate growth to areas with limited active travel and public transport infrastructure. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy.</p> <p>The transport baseline summary report states “most existing housing developments within the SHUAs provide footpaths which are attractive enough for most people to consider short trips by foot, however the distance to destination reduces the attractiveness of trips being made by this mode. Public transport options currently consist of limited and infrequent bus services between settlements...combined with lower levels of service for public transport and active travel modes means that the existing population is likely to have a relatively high dependency on private car travel...” The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, “based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road</p>

network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality". Conversely, the transport baseline summary on numbered page 37 recognises that "the Winchester Town Area has the highest levels of transport accessibility across the District, with services and supporting infrastructure for public transport, walking and cycling in the district." This statistic mirrors those presented within Calibro's Transport Feasibility report (appendix 4) which identified that the equivalent Winchester Town Area comprises of more than 40% of the available jobs in the District – 11 times greater than the next largest area of employment. This is four times the size of the next largest cluster of job opportunities.

Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary provided on numbered page 37 of the Transport Assessment (August 2024) report. Consequently, delivering significant growth in other areas will inevitably result in the need to commute to the city over longer distance to access those opportunities. Such locations are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car – compounding existing congestion, delay, air quality and variance in public transport journey times within WTA. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions.

In addition to the above, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision. Indeed, the proposed allocations outside of the WTA are on low frequency bus routes with significant journey times into the WTA, where over half of all journeys would to travel to access employment.

Despite the fact that such explicit recognition that WTA is the most sustainable location for growth, has been provide throughout the various iterations of the evidence base, the spatial strategy proposes to deliver some 63.7% of growth outside of the Winchester Town Area, in the least sustainable locations in the District. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This political interference has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA.

	<p>The Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy. Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP's stated objectives but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.</p> <p>Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP's stated objectives but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.</p> <p>Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>



*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TA-K
<b>Full reference number</b>	ANON-AQTS-32TA-K/2/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Taylor Wimpey Strategic Land (TWSL) support the principle of the Draft Plan’s spatial strategy for distributing housing across a hierarchy of settlements based on their relative sustainability. However, the Plan fails to achieve that for the reasons set out below, and as such should be revised in order for it to be found sound.</p> <p>The distribution proposed in the Draft Plan is unevenly weighted in favour of focusing the majority of new development in urban areas, with just 4,250 (25%) to be accommodated in the Market Towns and Rural Area (MTRA). This pattern of development is likely to lead to a growing concentration of services in the existing, larger, urban areas to the detriment of investment in the settlements across the rest of the District (the MTRA). This pattern of growth is also unsustainable because the likely gradual degradation of rural services will lead to a high number of people travelling to the larger urban areas to access services and facilities. This will give rise to an increase in the number of vehicles on the road with associated localised effects on air quality, ground water quality and ecology. It will also lead to less socially cohesive communities, as people will be less likely to venture out if there are reduced services to access.</p> <p>An increase in the housing requirement of the MTRA’s as a result of increasing the Plan period, accounting for unmet needs and a suitable buffer (see out comments in relation to Policy H1) would lead to far more sustainable pattern of development across the District and provide the population to support existing and future services in the less urban / rural locations. There is also an overreliance on existing, large and often complex allocations. The two allocations relied on in the South Hampshire Urban Areas are long standing allocations being developed by consortia and that have both been subject to delays during their respective build out periods as a result of issues associated with their size. It is not unlikely that the remaining phases will be subject to the same slow delivery pace, particularly whereby consortium member payment of the costs associated with the on-going delivery of large-scale joint infrastructure may need to be renegotiated.</p>

	<p>We also have concerns around the imbalanced spatial distribution of housing across the MTRA. Policy SP2 provides housing figures to be delivered in Winchester, South Hampshire Urban Areas, and the MTRA – for the MTRA about 3,850 homes. Policy H1 then repeats this distribution, although the MTRA figure is 3,825, not 3,850. Policy H3 then splits the 3,825 homes in the MTRA into commitments and new allocations spread between five market towns, five larger rural settlements, five intermediate settlements, and the remaining rural area. The five larger rural settlements are Colden Common, Denmead, Kings Worthy, Swanmore and Wickham with Swanmore moving up the hierarchy – we support this.</p> <p>Policy H3 proposes new allocations of 610 homes to the five larger rural settlements. The table on page 389 of the Draft Plan states that each of these settlements were asked to identify new sites for 90-100 homes – at most this would add up to 500 new homes, not 610. The 610 total proposed allocation figure is skewed because it includes an allocation of 200 dwellings at Knowle (Policy KN1 – Ravenswood). Knowle is a small settlement in the rural area of Wickham Parish, not at Wickham. This undermines the spatial strategy which bases housing distribution on the sustainability of settlements, not parishes. There is also uncertainty around the deliverability of KN1. It should not be relied upon to meet the housing needs of the larger rural settlements. Of the remaining 410 dwellings, only 290 will deliver open market and affordable housing. This is because the 120 dwellings at two allocations in Kings Worthy (KW1 and KW2) are for older persons housing.</p> <p>We submit that the Plan should be amended so that its allocations better reflect its spatial strategy. The 200 home allocation at Knowle should be deducted from the larger rural settlements total, leaving 410 dwellings. To help address this shortfall, we suggest that that a new greenfield allocation of land for 225 homes at Land at Field Farm, Swanmore (ref. SWA10) is included in the Plan.</p> <p>As set out elsewhere in these representations, site SWA10 scored equivalent to, or better than the other five sites considered for allocation in Swanmore within the Integrated Impact Assessment (IIA). SWA10 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant constraints and lies adjacent to the settlement policy boundary. As such, it should be allocated for development to help address the imbalanced distribution of housing across the District identified above and the higher overall housing requirement (see comments in relation to Policy H1), and Policy H3 should be amended accordingly.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H3 should be amended to increase the amount of new allocations across the MTRA. See response to question below.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H3 should be amended to uplift the amount of new allocations across the MTRA to help meet the increased housing requirement set out in our response to Policy H1. We would welcome the opportunity to discuss the appropriate figure and how this is distributed across the MTRA at the Examination Housing round table session. Land at Field Farm, Swanmore (SWA10), should be allocated for residential development to help meet some of this requirement.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies and evidence base)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3BPV-M
<b>Full reference number</b>	ANON-AQTS-3BPV-M/3/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Bargate Homes support the principle of the Draft Plan’s spatial strategy for distributing housing across a hierarchy of settlements based on their relative sustainability. However, the Plan fails to achieve that for the reasons set out below, and as such should be revised in order for it to be found sound.</p> <p>The distribution proposed in the Draft Plan is unevenly weighted in favour of focusing the majority of new development in urban areas, with just 4,250 (25%) to be accommodated in the Market Towns and Rural Area (MTRA). This pattern of development is likely to lead to a growing concentration of services in the existing, larger, urban areas to the detriment of investment in the settlements across the rest of the District (the MTRA). This pattern of growth is also unsustainable because the likely gradual degradation of rural services will lead to a high number of people travelling to the larger urban areas to access services and facilities. This will give rise to an increase in the number of vehicles on the road with associated localised effects on air quality, ground water quality and ecology. It will also lead to less socially cohesive communities, as people will be less likely to venture out if there are reduced services to access.</p> <p>A more even distribution across the three main areas identified to accommodate housing would lead to far more sustainable pattern of development across the District and provide the population to support existing and future services in the less urban / rural locations. There is also an overreliance on existing, large and often complex allocations. The two allocations relied on in the South Hampshire Urban Areas are long standing allocations being developed by consortia and that have both been subject to delays during their respective build out periods as a result of issues associated with their size. It is not unlikely that the remaining phases will be subject to the same slow delivery pace, particularly whereby consortium member payment of the costs associated with the on-going delivery of large-scale joint infrastructure may need to be renegotiated.</p>

We also have concerns around the imbalanced spatial distribution of housing across the MTRA. Policy SP2 provides housing figures to be delivered in Winchester, South Hampshire Urban Areas, and the MTRA – for the MTRA about 3,850 homes. Policy H1 then repeats this distribution, although the MTRA figure is 3,825, not 3,850. Policy H3 then splits the 3,825 homes in the MTRA into commitments and new allocations spread between five market towns, five larger rural settlements, five intermediate settlements, and the remaining rural area. The five larger rural settlements are Colden Common, Denmead, Kings Worthy, Swanmore and Wickham. Waltham Chase previously fell into this tier of the settlement hierarchy but was downgraded at Regulation 18 stage to the intermediate settlement tier.

Policy H3 proposes new allocations of 610 homes to the five larger rural settlements. The table on page 389 of the Draft Plan states that each of these settlements were asked to identify new sites for 90-100 homes – at most this would add up to 500 new homes, not 610. However, Waltham Chase should also be asked to identify 90-100 dwellings and be classified as a larger rural settlement (as was originally proposed as part of the Local Plan preparation process) taking the total to circa 600 homes. Furthermore, the 610 total proposed allocation figure is skewed because it includes an allocation of 200 dwellings at Knowle (Policy KN1 – Ravenswood). Knowle is a small settlement in the rural area of Wickham Parish, not at Wickham. This undermines the spatial strategy which bases housing distribution on the sustainability of settlements, not parishes. There is also uncertainty around the deliverability of KN1. It should not be relied upon to meet the housing needs of the larger rural settlements. The 200 home allocation at Knowle should be deducted from the larger rural settlements total, leaving 410 dwellings. To help address this shortfall, we suggest that housing should be distributed across the larger settlements which have no new open market and affordable housing allocations, including Waltham Chase where Land at Lower Chase Road (SHELAA Site SH11) should be allocated for about 90 dwellings.

Notwithstanding that Waltham Chase should be reinstated into the larger rural settlements tier, the Regulation 19 Plan categorises it within the intermediate settlements tier alongside Hursley, Otterbourne, South Wonston and Sutton Scotney. Policy H3 proposes new allocations of only 155 homes across these five settlements. The table on page 389 states that all of these settlements were asked to identify new sites for 50-60 homes – this would add up to between 250 and 300 homes, not 155, therefore a shortfall of between 95 and 150 dwellings. This is in part due to an over-reliance on the rolling forward of historic allocations from the adopted Local Plan, including Morgans Yard in Waltham Chase (Policy WC1). We have concerns around the deliverability of Morgans Yard as set out further in our comments on Policy WC1.

Waltham Chase is a sustainable location for new development, with a range of services and facilities, including a primary school, regular bus services, a convenience store/post office, hairdressers and nursery.

	<p>The settlement hierarchy in the adopted Local Plan includes Waltham Chase as a 'larger village' within the MTRA tier of the settlement hierarchy. At the early stages of the Local Plan review, WCC asked Shedfield Parish Council to accommodate 90-100 dwellings in Waltham Chase. Shedfield Parish Council then suggested that Waltham Chase should be downgraded in the settlement hierarchy so that its requirement is reduced, which WCC acceded to. The 2022 SHR was prepared in the context of this request such that the downgrading of Waltham Chase in the settlement hierarchy is not due to the sustainability credentials of the settlement. The SHR has several shortcomings and its methodology and assessment should be updated to better reflect the level of services and facilities on offer at Waltham Chase. Bargate Homes' site, Land South of Lower Chase Road in Waltham Chase (SH11), has scored equivalent to, or higher than (allowing for corrections the site assessments) the site allocation at Morgan's Yard (WC1), which has been rolled forward as an allocation in the Draft Plan. Given WC1 has been considered suitable for allocation, there is no overriding reason why SH11 cannot be allocated to address the imbalanced distribution of housing across the District.</p> <p>Policy MTRA 2 of the Local Plan Part 1 (adopted in 2013) set out the provision of about 250 dwellings in each of the 'larger villages', which included Waltham Chase. The Local Plan Part 2 (adopted in 2017) went on to allocate a total of 275 dwellings at Waltham Chase across four sites (WC1-WC4) towards meeting the Plan's housing requirement over the period 2011-2031. The allocations at WC2-WC4 were built out in the early part of the Plan period, delivering a total of 174 dwellings. However, the allocation for 100 dwellings at WC1 has yet to deliver any dwellings. Policy H3 of the Draft Plan carries forward the Morgans Yard allocation, but reduces the number of dwellings at the site to 80, reflecting the resolution to grant planning permission for this amount in January 2024 (ref. 21/02439/FUL). The site has suffered from viability issues, largely as a result of substantial remediation costs. Despite a resolution to grant planning permission in January 2024 (almost seven years after it was first allocated), a S106 Agreement has yet to be entered into and planning permission has not been granted. As such, there is no clear evidence that homes will be delivered at the site and it does not therefore meet the definition of deliverable within Annex 2 of the NPPF. It should not be relied upon to meet the housing needs of Waltham Chase.</p> <p>In contrast, SH11 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant constraints and lies adjacent to the settlement policy boundary. Development would result in a logical rounding off of the settlement by continuing the existing pattern of development no further north than Lower Chase Road to the north, ensuring only negligible impact on the existing Gap. It should therefore be allocated for the development of around 90 dwellings and Policy H3 should be amended accordingly.</p>
<p><b>What modification(s) are necessary to make the</b></p>	<p>Policy H3 should be amended to increase the amount of new allocations across the MTRA and Waltham Chase should be moved to the larger rural settlements tier. See response to question below. Policy H3</p>

<p><b>policy legally compliant or sound?</b></p>	<p>should be amended to uplift the amount of new allocations across the MTRA by at least 30% (ie. to at least 1,255 dwellings) to help meet the increased housing requirement set out in our response to Policy H1. We would welcome the opportunity to discuss the appropriate figure and how this is distributed across the MTRA at the Examination Housing round table session.</p> <p>Policy H3 should also be amended to move Waltham Chase to the larger rural settlement tier and the new allocations total for this tier should be increased to allow for the allocation of 90 dwellings at Land South of Lower Chase Road (SHELAA ref SH11). The table on pages 389 and 390 should be updated accordingly. The Policies Map should also be amended to show the allocation of SH11.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H3 should be amended to uplift the amount of new allocations across the MTRA by at least 30% (ie. to at least 1,255 dwellings) to help meet the increased housing requirement set out in our response to Policy H1. We would welcome the opportunity to discuss the appropriate figure and how this is distributed across the MTRA at the Examination Housing round table session.</p> <p>Policy H3 should also be amended to move Waltham Chase to the larger rural settlement tier and the new allocations total for this tier should be increased to allow for the allocation of 90 dwellings at Land South of Lower Chase Road (SHELAA ref SH11). The table on pages 389 and 390 should be updated accordingly. The Policies Map should also be amended to show the allocation of SH11.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (comment on Policies and Evidence Base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Transport advice - Land north of Meon Green, Forest Road, Waltham Chase)</a></p> <p><a href="#">Supporting document 2 (Vision Document - Land South of Lower Chase Road, Waltham Chase)</a></p>



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	O'Flynn Group
<b>Personal reference number</b>	ANON-AQTS-32TE-Q
<b>Full reference number</b>	ANON-AQTS-32TE-Q/3/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>4.1 O'Flynn Group objects to Strategic Policy H3 (Distribution of Housing Development).</p> <p>4.2 Paragraph 60 of the NPPF (2023) states it is important that a sufficient amount and variety of land can come forward where it is needed. The Local Plan heavily weights its housing allocations to the south of the District, resulting in an unbalanced spatial distribution.</p> <p>4.3 As noted previously, the level of unmet need across the PfSH has remained above 10,000 since the production of the first spatial position statement in 2020 and yet the Council is only intending to provide 1,900 homes to help address meeting the shortfall. Despite testing a number of alternative growth options through the IIA, none of these considered the reasonable option of allocating a significant quantum of growth in the north of the District.</p> <p>4.4 It is unclear why the Council has not positively pursued an approach of tapping into sustainable locations in the north of the District which utilise strong public transport links or why a disproportionate level of development of housing is located in the south of the District. A strategic scale allocation in the north of the District would result in additional homes being delivered, achieving a balanced pattern of growth. It would also free up capacity in the south of the District to meet more of unmet need from South Hampshire in locations close to its urban edge. For example, the Council could allocate Micheldever Station in the north of the District to meet Winchester District's own needs, freeing up sites in the south to be allocated for PfSH unmet needs, but also providing a source of capacity for unmet needs by virtue of the direct train links that pass through the site.</p> <p>4.5 The Council has not actively explored this option or shown it to be a sustainable way of meeting housing needs.</p> <p>4.6 Further, no consideration has been given by the Council to whether or how there could be cross-boundary synergy between the proposal by Basingstoke to allocate land at Popham Airfield (north of the A303) for a new community of 3,000 homes. There is plainly an opportunity to make that proposal – if acceptable – more sustainable by using an allocation for a new 6,000 home town at Micheldever Station (as promoted) to unlock the connections to the rail station from Popham Airfield and create a synergy and support social and community infrastructure.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on Policies, Duty to Co-operate &amp; Evidence Base)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/11/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>9.41 Policy H3 describes the proposed spatial apportionment of housing in accordance with the spatial strategy, which is critiqued within wider submissions to the 2040 plan. Vistry and Taylor Wimpey disagree that the proposed spatial strategy and resultant distribution are sound, due to the failure to prioritise growth at Winchester and by maintaining a strategy that assigns a significant component of the ‘core’ housing requirement for Winchester derived from the standard methodology to the South Hampshire areas of the district. This serves to continue with an approach that has its origins in regional planning guidance (RPG9), that was continued with greater prescription by the long since revoked Southeast Plan. The South Hampshire Sub-Regional Strategy Area included the southern parts of Winchester district within the sub-region, pursuant to the provisions of Policies H1, H1a, H1b, and SH1, which allocated development to this area specifically. The adopted Local Plan and the emerging 2040 Plan largely continue this spatial response. While the spatial rationale has merit and may well be returned to in due course via future revisions to the planning system, the regulatory framework has changed.</p> <p>9.42 Regional planning was revoked by the Coalition Government, and through the advent of the duty to cooperate introduced via the Localism Act, the requirement to plan strategically across local authority boundaries is most often carried out with an obligation only relating to process rather than outcomes. Quantified spatial prescription exists now only in respect of individual planning authority areas, via application of the standard methodology, with a duty to discuss the accommodation of unmet housing needs from outside imposed by S.33A.</p> <p>9.43 As is widely understood, the obligation to make provision for housing from other local authority areas is not mandatory, only the requirement to cooperate in examining the capacity to meet such needs is obligatory. The extent to which cooperation has genuinely taken place is a matter of compliance that can result in failure of emerging plans at examination if sufficient consideration has not been given. As noted above, the duty to cooperate is concerned with process rather than outcome and consequently can be circumvented in terms of providing for the proper strategic planning of an area. Even where some regard is had to the duty, which Winchester City Council will assert is the case with the 2040 Plan, there is unlikely to be an effective response that fully addresses unmet needs (see response to Policy H1).</p>

	<p>9.44 As highlighted in the response to Policy H1, Winchester is one of the partner authorities able to identify land that could make a significant contribution to addressing the levels of unmet need that are, and will be, manifest. Having regard to the spatial arrangement of the district it would make obvious sense to treat the southern areas – the South Hampshire Urban Areas (SHUA) – as defined locations to meet the unmet needs that will arise in Havant, Portsmouth, Southampton, Gosport, and potentially other PfSH areas. Rather than treating housing that is already committed and due to be allocated in the SHUA area as contributing to meeting the ‘core’ minimum requirement for Winchester generated by the standard methodology, it would be more appropriate to assign it to meeting unmet needs from the PfSH area given the spatial and functional characteristics. Additional housing could then be allocated around Winchester, including the land to the north of Wellhouse Lane, and potentially elsewhere, in accordance with sustainable development objectives, to address the quantum of housing to meet locally arising needs generated by the standard methodology.</p> <p>9.45 The contention at paragraph 9.27 of the 2040 Plan that Winchester Town is heavily constrained is not accepted. Compared to partner authorities to the south the undeveloped areas around Winchester are unaffected by national/international designations that would preclude development. Previous submissions to the Regulation 18 consultation stages have alluded to this situation and have provided evidence in support of the contention.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The spatial apportionment of housing growth should be reassigned to help address the unmet housing needs of partner authorities within the South Hampshire area. The southern SHUA area of the district should be prioritised to address unmet housing needs that will arise principally from the neighbouring authorities of Havant, Portsmouth, Gosport, and Southampton. Local housing need applying to Winchester district should be distributed between Winchester Town and the MTRA areas of the district.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The spatial apportionment of housing growth should be reassigned to help address the unmet housing needs of partner authorities within the South Hampshire area. The southern SHUA area of the district should be prioritised to address unmet housing needs that will arise principally from the neighbouring authorities of Havant, Portsmouth, Gosport, and Southampton. Local housing need applying to Winchester district should be distributed between Winchester Town and the MTRA areas of the district.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a>  <a href="#">Supporting Document (Planning for South Hampshire)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/5/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H3</p> <p>Policy H3 sets out the settlement hierarchy for the district, and the numbers of new homes expected to be delivered by locations at each level of the hierarchy.</p> <p>Although the settlement hierarchy, and the spatial strategy is supported, it is noted that the geographical extent of the different elements of the hierarchy is not well defined. For example, it is not clear which area Winchester Town refers to. As is set out later in the draft Local Plan, the Sir John Moore Barracks allocation is identified as being part of the Winchester Town sub area. However, the allocation is located to the east of the settlement of Littleton, and covers much of the area between Littleton and Winchester. It could therefore be concluded that Littleton is considered to be part of the Winchester Town sub area.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	It is suggested that the relevant areas covered by these elements of the spatial strategy could be shown on the Policies Map.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Footstep Active Living Ltd
<b>Personal reference number</b>	BHLF-AQTS-32EE-8
<b>Full reference number</b>	BHLF-AQTS-32EE-8/2/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Southdown is a sustainable settlement with a range of facilities and services within walking distance. The NPPF#70 acknowledges that smaller sites “can make an important contribution to meeting the housing requirement of an area, and are often built up relatively quickly”. Mindful of the ‘brownfield first’ approach championed by the Local Plan, small-scale development opportunities that are below the threshold size for allocation; which would provide infill and rounding off opportunities; that are physically, functionally and visually related to the existing urban areas; should be released through a review of the settlement boundary. This echoes the 2014 Settlement Boundary Review (which formed part of the evidence base for the current Adopted Local Plan Part 2) which added “where there are any obvious and suitable candidates, boundaries could be adjusted to accommodate them and provide a degree of flexibility within the housing supply”. Land at George Becketts Nursery extends to approximately 3.5ha and comprises land and buildings in horticultural use, a dwelling house, and associated land and buildings in retail use. The retail element fronting the highway is no longer required (“The site”). This area represents previously developed land (PDL). The site (edged in red on the accompanying plan) adjoins the settlement boundary of Southdown. It is located in a highly sustainable location being walkable to a range of local facilities and services (including primary school – 20 minute walk; and a convenience store – 10 minute walk; as well as close to public transport links (frequent bus route – 2 minute walk; and Shawford train station – 25 minute walk). Settlement boundaries should have a degree of permanence to avoid constant change over time. The site is flanked on either side by residential development which visually and physically separates the site from undeveloped land to the south. There is also a mature belt of trees/hedgerow separating the site from the undeveloped land to the south. When travelling south along Otterbourne Road, after the site there is an abrupt end to the urban fabric and a clear transition to a more undeveloped landscape. The tree/hedgerow group creates a logical and defensible boundary and establishes a logical and semi-natural edge to the urban fabric. An alternative means of access to the nursery also reinforces this settlement edge and provides a permanent defensible boundary.</p> <p>The 2014 Review advised that small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area could be</p>



	released through a review of the settlement boundary.. Further, it advises that curtilages that are contained, are visually part of the urban area and are separated from the open countryside will also be included. This site continues to meet these criteria and presents an opportunity to make “efficient use of land and buildings” and to “prioritise the use of previously developed land/buildings in accessible locations”.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend settlement boundary.
<b>What is your suggested wording or text for the policy?</b>	Amend settlement boundary to include the site frontage at George Beckett Nurseries
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Location Plan)</a> <a href="#">Supporting document 2 (form commenting on H3)</a> <a href="#">Supporting document 3 (Form commenting on D6)</a> <a href="#">Supporting document 4 (Form commenting on H4)</a> <a href="#">Supporting document 5 (Form commenting on NE7)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	George Whalley
<b>Personal reference number</b>	BHLF-AQTS-32EY-V
<b>Full reference number</b>	BHLF-AQTS-32EY-V/5/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>We object to Policy H3 which is not justified or consistent with the Local Plan settlement hierarchy. The policy currently directs a disproportionate level of growth to lower order and less sustainable rural settlements including lower intermediate rural settlements. This includes the proposed allocations in Sutton Scotney and South Wonston. A higher proportion of growth should be directed to the most sustainable settlements in the hierarchy including within the Market Town of Bishops Waltham.</p> <p>Land at Mill Chase provides an opportunity to deliver about 50 dwellings on land adjoining the settlement boundary of Bishops Waltham. Allocation of this site in the Plan is consistent with the settlement hierarchy and is a more sustainable approach than directing growth to constrained intermediate rural settlements that lack the key facilities to support growth. The site (c. 3.4ha) is located approximately 650m south of Bishops Waltham Town Centre and is immediately adjacent to the settlement boundary. There are a number of bus stops within comfortable walking distance including main bus routes from the centre of Bishops Waltham within a 10 minute walk. Also, within a 10-minute walk (800m) from the site access are multiple amenities such as schools, places of worship, medical care, and community centres. Supermarkets including Hylands, Co-op, and Sainsbury's Local, as stated in the Vision Statement.</p> <p>The site is located in flood zone 1 and is at the lowest risk of flooding. The development will include a sustainable drainage solution (SuDs) combining surface water attenuation with biodiversity enhancement. A transport assessment was undertaken for the site by Pell Frischmann in November 2023 to assess the sustainability of the site in relation to accessibility to local services / facilities and to assess site access arrangements. A Heritage Statement has been prepared in January 2024 to inform the site master plan. Development of the site will not result in significant harm to heritage assets including the Bishops Waltham Conservation Area and nearby listed buildings. The Bishops Waltham Conservation Area and Scheduled Bishops Palace are located some distance to the north-west of the site and the proposed development will</p>

not result in harm to their setting. The provision of a landscape and heritage buffer adjacent to the site prevents harm to the setting of nearby listed buildings, as stated in the Vision Statement.

A habitat survey and Biodiversity Net Gain Assessment was undertaken for the site in November 2023. The Moors Site of Special Scientific Interest (SSSI) and Local Nature Reserve are located to the east of the site, beyond Winchester Road. The proposal includes the enhancement of grassland woodland, scrub and hedgerows and 10% BNG can be achieved in accordance with local policy requirements, as detailed in the Vision Statement. The Site is not covered by any statutory landscape designation. The South Downs National Park (SDNP) encompasses the landscape to the north and east of Bishop's Waltham, extending to the northern side of the B2177 Winchester Road. The site is well screened by an existing mature tree belt along the Winchester Road which limits the intervisibility between the site and the National Park and provides a robust separation between the SDNP and the site.

The Local Plan defines settlement gaps in the district which includes the Bishops Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap. The site is located adjacent to the southern settlement boundary and the northern edge of the Bishops Waltham and Waltham Chase settlement gap. Policy NE7 sets out that within local gaps development will be permitted that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements. The policy goes on to state that any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence. A Settlement Gap Review has been undertaken by LUC on behalf of the Council in July 2024 to inform preparation of the Local Plan. The study concludes that the gap between Bishops Waltham and Waltham Chase is relatively strong, with gap size and the presence of significant woodland or tree cover contributing to gap separation. The site maintains the integrity and current strength of the Bishops Waltham and Waltham Chase settlement gap. In accordance with Policy NE7 development of the site will retain the separate identity of Bishops Waltham and Waltham Chase, avoid coalescence and maintain the generally open and undeveloped nature of the gap. An arboricultural constraints assessment was undertaken in October 2023 to inform the preliminary layout, taking proper account of tree constraints. The proposed development will retain significant trees to minimise impacts on biodiversity and to protect the landscape character screening views into and out of the site.

Bishops Waltham is identified as a Market Town in the local plan settlement hierarchy and a focus for growth in the district outside of Winchester City and the South Hampshire Urban Areas. Growth should be primarily directed to the higher order settlements in the settlement hierarchy. Land at Mill Chase provides the opportunity to deliver c50 dwellings in the Market Town of Bishops Waltham. The site is of modest scale in this sustainable location would be deliverable in terms of suitability, availability and 'achievability'. The site is well connected by public transport services to Winchester, the rest of Hampshire and within comfortable

	<p>walking distance of a range of key services and local facilities that would help support a sustainable community. The site does not have a significant impact on landscape character and is not located within or adversely affect ecological sites of international, national or local ecological importance. The site will maintain the integrity of the Bishops Waltham and Waltham Chase settlement gap.</p> <p>Therefore, in accordance with the settlement hierarchy, Local Plan evidence and local constraints, land at Mill Chase should be allocated in the local plan and included within Policy H3 Spatial Housing Distribution. It can also be delivered within the next 5 years and provides a valuable contribution towards the local plan housing requirement and current shortfall in relation to unmet housing need in the area. A proposed allocation policy for the site is set out in Appendix 4.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Land at Mill Chase should be allocated in the local plan and included within Policy H3 Spatial Housing Distribution. It can also be delivered within the next 5 years and provides a valuable contribution towards the local plan housing requirement and current shortfall in relation to unmet housing need in the area. A proposed allocation policy for the site is set out in Appendix 4.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Supporting information (commenting on policies and proposed site)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	English Oak Care Homes
<b>Personal reference number</b>	BHLF-AQTS-32EJ-D
<b>Full reference number</b>	BHLF-AQTS-32EJ-D/4/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>omission site</p> <p>Land west and south of Shedfield Lodge – The Opportunity</p> <p>4.1 The site is located to the west and south of Shedfield Lodge which is located approximately 5km to the east of Botley. The whole site extends to approximately 1.92ha. The site is located immediately adjacent to Shedfield Lodge, an existing care home affiliated to English Oak Care Homes.</p> <p>4.2 The site is largely unconstrained and it presents a significant opportunity to provide a logical extension to the existing care home facility to assist in meeting the Specialist and Supported Housing needs of the local community as well as helping Winchester City Council meet its ongoing housing requirements, and the unmet need arising from the wider PfSH area.</p> <p>4.3 The aspiration is to provide a new care village which would comprise self-contained Specialist and Supported Housing for older people and those with dementia. The site could accommodate different types of housing and also provide on site facilities including a restaurant and other facilities for occupants. The site would be appropriately landscaped to provide enrichment for the occupants and also provide Biodiversity Net Gain.</p> <p>4.4 As expressed, there is a need to boost the housing provision in line with the Government's aspirations, and in particular housing for older people therefore we urge the council to look at the clear opportunity presented by the site adjacent to Shedfield Lodge.</p> <p>4.5 The site presents a rare opportunity for an unconstrained site in a sustainable countryside location to be developed to deliver much needed high-quality Specialist and Supported Housing for people within the District. The proposed development would be wholly consistent with the existing use of Shedfield Lodge. Please see the latter sections of the Need and Demand Report which provide further details on the site and present the opportunity and vision.</p> <p>4.1 In accordance with the definition of 'deliverable' within the NPPF (2023), the site is available for development now, is in a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years</p>

	following the sites allocation. see supporting information for further detail
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a> <a href="#">Supporting document 1 (need/demand report for Oak Care Village)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Heritage Property Southern Limited
<b>Personal reference number</b>	BHLF-AQTS-326E-S
<b>Full reference number</b>	BHLF-AQTS-326E-S/3/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The following local plan representation is submitted on behalf of our client Heritage Property Southern Limited, freehold owner of the site known as The Portsdown Main Site, James Callaghan Drive, Portsmouth, PO6 4EZ (your reference SWI03).</p> <p>The Council's response to our client's Draft Plan (Regulation 18) consultation submission contains factual errors and is misleading in respect of the provisions of the Section 106 agreement of the 28th September 2006 entered into by Winchester City Council, Hampshire County Council and The Secretary of State for Defence insofar as this relates to the Portsdown Main Site (referred to therein as 'Redundant Facilities at Portsdown Hill'.</p> <p>Allocation within emerging Portsmouth City Local Plan 2040.</p> <p>The Council's response states "The emerging Portsmouth City Local Plan allocates the part of the site within Portsmouth City Council for Research &amp; Development (class E(g)(ii) and/or manufacturing (class B2) uses (policy PLP10). The policy restricts development to the previously developed land, adjacent to Portsdown Technology Park, within Portsmouth City and requires a comprehensive landscape design strategy (amongst other requirements).</p> <p>By means of a Statement of Common Ground agreed between our client and Portsmouth City Council (<a href="https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Land-_West_of_Portsdown_Technology_Park_SCG_September-2024-Final_Signed.pdf">https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Land-_West_of_Portsdown_Technology_Park_SCG_September-2024-Final_Signed.pdf</a>) that part of the Portsdown Main Site which falls within the Portsmouth City Council administrative area is proposed to be allocated for "12,500m2 Research &amp; Development class E(g)(iii), manufacturing (class B2), and/or storage or distribution (class B8)." Furthermore, the provision relating to the location of development within the site is amended to "Focus development to the previously developed land adjacent to Portsdown Technology Park and minimise built structures on the northern downland slope".</p> <p>Appendix 5 of the Statement of Common Ground provides an agreed (other than proposed units 10 &amp; 11) Preliminary Site Layout Plan. This shows proposed units adjacent to both the southern and eastern boundary of that part of the site that is within the Winchester City Council administrative area. When viewed with the consented development to the western boundary of the site (Winchester City Council application reference</p>

	<p>21/02548/FUL), the promoted site is bordered on three sides by either approved or allocated commercial development.</p> <p>Section 106 Agreement of the 28th September 2006.</p> <p>This agreement was entered into in respect of a consent granted for the “major refurbishment of the two court buildings; insertions and additions into courtyards; new data centre, screening building and ancillary buildings/enclosures; 400 car parking spaces” at Portsdown West, a site some 1.7km west of Portsdown Main and which, at the time, was under the same ownership.</p> <p>It is understood that at the time redundant buildings located at Portsdown Main were subject to unauthorised entry, anti-social behaviour and vandalism. The agreement therefore required the demolition of said buildings, identified as buildings 13 (Old Engineering Block), 19 (Workshop Store), 27 (ERI Ground and First Floor) and 10 (CEL Ground and First Floor), totalling approximately 4,317m<sup>2</sup> of floorspace. The agreement specifically excluded “any of the Portsdown Mains car parking spaces”. The agreement does not purport, nor has any documentation been identified indicating that the Council sought, to make any change to the lawful use of the site nor to constrain future redevelopment.</p> <p>see supporting information for further detail</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Form and supporting information (commenting on policies)</a></p>



*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	OWEN JONES
<b>Personal reference number</b>	BHLF-AQTS-326Y-D
<b>Full reference number</b>	BHLF-AQTS-326Y-D/3/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Land at Hambledon Road DENMEAD see supporting information for further detail
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (Commenting on policies)</a> <a href="#">Supporting Information (Site promotion - Land at Hambledon Road, Denmead)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/8/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>There appear to be inconsistencies with the numbers set out within Policy H3 and the details provided as part of all site allocations, with Policy H3 referring to 15,115 units, whilst the detailed tables of the site allocations add up to 15,112 units, both exclusive of the 350 dwellings within the South Downs National Park (SDNP). Policy H3 further refers to 2,875 new allocations proposed, whilst the detailed site allocations add up to 3,125 dwellings. It should be ensured that the numbers align throughout the plan for consistency.</p> <p>Any local housing needs that are unable to be met in Winchester or South Hampshire Urban Areas, should be directed towards the most sustainable Market Towns. Kings Worthy has a total of 1,804 households and a population of 4,923 persons. The proposed level of growth represents a marginal increase in households by 5.5%, whereby there is considered to be scope for additional growth for additional allocations of a suitable scale.</p> <p>It is anticipated that, of the 15,645 dwellings, ca 14,463 dwellings may come forward within the plan period, whilst ca 1,002 dwellings are either anticipated to fall outside of the plan period or will unlikely be developed, as detailed in Appendix C. Based on an initial, high-level review of the allocations, the following sites are assumed to lead to protracted timescales beyond the plan period or insufficient evidence is provided to demonstrate deliverability, with further details set out in Appendix C:  W1 Barton Farm: W2 John Moore Barracks: W7 Central Winchester Regeneration: SH1, West of Waterlooville: SH2 North Whiteley: SH3 Land at Whiteley Green: BW1 The Vineyard/Tangier Lane: NA1 The Dean: NA2 Sun Lane: NA3 Neighbourhood Plan designated area: CC1 Clayfield Park: DEN1 Neighbourhood Plan designated area: KW2 Land adjacent Cart and Horses PH: WK1 Winchester Road: WK6 Land at Southwick Road / School Road: HU1 Neighbourhood Plan designated area: SU01 Land at Brightlands:</p> <p>To ensure the plan can be found sound, it is essential that sufficient evidence is provided to demonstrate that</p>

	<p>the sites are deliverable within the plan period. Furthermore, the uncertainty in relation to supply, specifically those which have been reduced or discounted (as above) highlight the Local Plan’s vulnerability and potential inability to maintain a deliverable five-year housing land supply within the early part of the plan period. Based on the above preliminary assessment of the allocated sites and their likely realistic delivery, it is considered that ca 1,002 dwellings will fall beyond the plan period or will unlikely be delivered. This reduces the housing land supply from 15,465 dwellings to 14,463 dwellings.</p> <p>To ensure that the draft WDLP is prepared in line with national policy, with particular consideration of the draft 2024 NPPF, it is strongly recommended to seek additional site allocations that will be able to deliver additional dwellings. Whilst it is understood that the draft NPPF 2024 seeks to ensure that local planning authorities adopt a hierarchy in relation to allocations, prioritising brownfield ahead of greenfield sites, it is considered that the draft WDLP has already maximised development potential across all brownfield sites. It is therefore recommended that the council undertake a review of additional sites to include for development, particularly on land that is sustainably located with good access to public transport, immediate services and facilities.</p> <p>The additional site east of Lovedon Lane could contribute to WDC meeting its local housing needs, which has been submitted in a previous Call for Sites and referred to in the previous representation submitted as part of the Issues and Options Regulation 18 consultation (as per Appendix B): In light of its sustainable location adjacent to the built-up area, this area should be prioritised to meet local housing needs and to effectively avoid unmet needs arising from the district. see additional info PDF omission site: Land east of Lovedon Lane, Kings Worthy. see vision document</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a></p>
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<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	James McAllister-Jones
<b>Personal reference number</b>	BHLF-AQTS-326A-N
<b>Full reference number</b>	BHLF-AQTS-326A-N/3/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>omission site Land at Paddock View, Littleton</p> <p>Our Site is within a sustainable edge-of-settlement location, directly adjacent to existing residential areas. The Strategic Housing and Economic Land Availability Assessment, which considered the Site in 2019, 2020, 2021 and 2023 under site reference LH04, concluded on all four occasions that the site is deemed deliverable, developable and available in accordance with NPPG. Furthermore, the suitability assessment confirmed that against the 24 environmental, physical, historic and policy constraints, Paddock View had no red and only 4 amber constraints. It should be noted that the assessment has concluded the Sir John Moore Barracks, which has been identified for development in the Plan, has six (6) amber constraints, against the SHELAA assessment and will result in coalescence between Littleton and Harestock. Despite the assessment, the Council have draft allocated this site, with poorer performance against these criteria, suggesting they are not adhering to guidance set out in the NPPG regarding identification of new development sites.</p> <p>Accordingly, the Site should therefore be allocated for residential use in the emerging Local Plan to meet the housing needs arising from the extension of the plan period and the current shortfall in provision. Our Vision Document attached shows how this will be delivered, as well as the landscape-led approach to placemaking, showing how our Site will be a natural extension to Littleton.</p> <p>see additional info PDF</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a> <a href="#">Supporting information (vision document)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Clayfield Developments Limited
<b>Personal reference number</b>	BHLF-AQTS-326S-7
<b>Full reference number</b>	BHLF-AQTS-326S-7/2/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Fillditch Farm is located within the Parish of Swanmore, approximately 1.4km of the main village settlement. While located within Swanmore Parish, the site is of closer proximity (approximately 0.5km) to the settlement of Waltham Chase (Shedfield Parish). The site is located to the east of Waltham Chase. There are good shopping facilities and access to secondary schooling within a reasonable walking distance of the site. The bus service is reasonable for a rural village, serving Winchester, Fareham and villages between for employment, leisure and shopping trips. The site is located to the south of Forest Road with established dwellings to its north and more recent residential development to its west. The site adjoins the Waltham Chase Meadows SSSI to its southwest. The site was identified and included within the 2020 &amp; 2021 SHELAA (SWA16), and in combination with SHELAA site SWA15 (Land South of Forest Road, Waltham Chase), offers a sustainable opportunity to contribute to plan area housing requirement.</p> <p>The site is located approximately 280m from a Primary School (St John the Baptist Church of England Primary School, Waltham Chase) and approximately 650m from Secondary School (Swanmore College). The site is situated approximately 2.7km from the nearest Doctor's Surgery (Bishops Waltham Surgery), however the site is well served by the X9 bus route which offers a two hourly service, and 69 bus route which offers an hourly service to Bishops Waltham, with a stop located within 300m of the site on Forest Road. Located to the south of Forest Road, development of the site would not significantly erode separation between existing settlements. The site, while not being within 800m of the District Centre of Bishops Waltham (emerging policy E3), it does benefit from good access (300m) to the X9, X10 &amp; 69 bus services offering regular weekday and weekend services to Bishops Waltham.</p> <p>Site feasibility masterplanning has been undertaken for the 6.24ha site, with appropriate consideration given to relevant national planning policy and guidance. Proposals have been revised to support this submission to take account of relevant proposed policies contained within the Regulation 19 consultation draft of the</p>



	<p>Winchester District Local Plan 2020 – 2040. Masterplanning for the site has been informed and is supported by the following commissioned reports:</p> <ul style="list-style-type: none"> <li>• Preliminary Ecological Assessment (Ecosupport, December 2022)</li> <li>• Archaeological Desk-Based Assessment (Border Archaeology, November 2022)</li> <li>• Landscape and Visual Appraisal (RHLA, October 2024)</li> </ul> <p>The Site provides the opportunity for new residential development within the settlement gap, reflecting the conclusions of the Strategic Housing and Employment Land Availability Assessment, which found the Site was ‘deliverable /developable’.” see additional info PDF</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form and letter (commenting on policy)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Chris Rees
<b>Personal reference number</b>	BHLF-AQTS-326G-U
<b>Full reference number</b>	BHLF-AQTS-326G-U/2/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>This representation demonstrates that the Council’s approach and resulting Policy H3 cannot be considered ‘justified’, nor consistent when applied in the assessment of development opportunities and the site selection process. The representation centres on the Village of Littleton and the wider Parish of Littleton and Harestock, which encompasses both the Village and the northern part of the City of Winchester. Littleton is the closest Village to Winchester City, with a separation distance of less than 800m at its closest point, and with the Parish Council covering both the Village and the northern part of the City itself, recognising the close relationship between the two areas.</p> <p>Littleton benefits fully from its own facilities, but also from this proximity to Winchester, with the local centres of both Weeke and Harestock within 2km of the Village; a distance recognised as one which would encourage walking and cycling to services and facilities. Despite this proximity and availability of services and facilities, the Village of Littleton is categorised by the City Council as one of the least sustainable in the District, scoring 10 and classed as a ‘Small Rural Settlement’ within the Settlement Hierarchy Paper (August 2024). This, we contend, and as evidenced within this Paper, is a complete misrepresentation, and not supported by the LPA’s own evidence and Spatial Strategy within the Regulation 19 Draft relating to the Sir John Moore Barracks. Before the Paper examines the LPA’s position in respect of the Barracks and the Nursery, it is necessary to also highlight another example of the skewed nature of the conclusions of the Settlement Hierarchy, which results in the Plan being unsound.</p> <p>This example concerns the village of Sutton Scotney, which scores 14 in the Council’s Settlement Hierarchy Assessment<sup>1</sup>, with the extra 4 points afforded by the LPA over Littleton being simply a Convenience Store and a Pre-School. As a result of this scoring, the LPA has allocated a greenfield site for 50-60 dwellings at Land at Brightlands within the Regulation Draft 19. This 50-60 greenfield allocation is located some 8km from the fringe of Winchester, with no supermarket, Primary or Secondary education facilities and no hourly bus</p>

service, and yet we are told by the LPA that this greenfield site represents a more sustainable form of development than a brownfield site within 2km of the aforementioned list of education, medical, retail and supermarket facilities.

Turning back to Littleton and the Barracks, as per Policy W2 of the Regulation 19 Draft, the Local Planning Authority advocates that Littleton & Harestock Parish is indeed a sustainable location for large scale residential development by way of the allocation of the Sir John Moore Barracks for 750-1,000 dwellings. Para 12.14 of the Local Plan identifies the location of the Barracks as being ‘...located between the settlement of Littleton and built-up area of Winchester Town, and approximately half of the site is located in the Settlement Gap (Policy NE7)’. (Para 12.14, Regulation 19 Draft). The latter part of this sentence is correct, with the southern portion of the land falling within the Local Gap as shown within Figure 1. However, it is false to state that the Sir John Moore Barracks Allocation falls ‘between Littleton and the built up area of Winchester’, given the majority of the Allocation as shown within Figure 1 extends to the east and northeast of the Village, thus extending further from the City of Winchester than much of the existing Village and the Littleton Nursery.

Indeed, as per the latest indicative Masterplanning for the Sir John Moore Barracks as shown in Figure 2, this includes housing within the northernmost extent of the Allocation; a distance significantly greater than that of the Littleton Nursery to the services and facilities of the most sustainable conurbation within the District. While the scale of the Sir John Moore Barracks and the Littleton Nursery is not comparable, its locations very much are, with the Local Planning Authority concluding that the Barracks is close enough to the City of Winchester so as to have a functioning relationship, and thus contribute towards the City’s ring fenced housing requirement.

In contrast, Littleton Nursery is, in the view of the LPA, located within an ‘unsustainable’ Village. This error goes to the heart of whether the Council’s site selection process is ‘justified’, and to illustrate this inconsistency further, Figure 3 provides a direct comparison between the two land parcels and the distances to the City and nearby services and facilities. For the purposes of this comparison, the central point of both the Nursery and the Barracks has been taken for the starting point of the concentric circles, which are drawn at 500m intervals. The Yellow Circles represent the Littleton Nursery, and the Red Circles the Sir John Moore Barracks, with both edged in the corresponding colour. Far from being remote and unsustainable, the majority of Littleton, inclusive of the Nursery site, falls within 2km of all of the services within Weeke and Harestock, including the Schools, GP Surgery, Pharmacy, Supermarkets and facilities. This is very much comparable, and indeed better than many of the other Towns and Villages within the District that are deemed ‘sustainable’ by the Local Planning Authority, and the Sir John Moore Barracks itself, which the Local Planning Authority has deemed to be a sustainable location.

	<p>The wording of Policy W2 requires the proposals for the Barracks to respect the 'Local Gap' between Littleton and Winchester, with the emerging Masterplan showing the housing set back from Harestock Road and limited to the existing built up area. As a development therefore, the future housing at the Barracks does not adjoin Winchester and is much more related to Littleton, to which it extends around its eastern flank and to the northeast.</p> <p>The Settlement Hierarchy cannot be a true reflection and thus justified if the interdependency of settlements in close proximity to one another has not been considered; particularly a Village such as Littleton, and the quantum and range of services and facilities within 2km of it. To do so results in a skewed and unjust assessment as evident in the case of Littleton, made even more unjust with the allocation of up to a 1,000 dwellings adjacent to it. Finally, in respect of the mid part of this response, it is not questioned that the future use of the Sir John Moore Barracks should be considered as part of the Local Plan process, but that to be considered 'sound', and be justified when considered against the reasonable alternatives, the future use of the Nursery should have been assessed on the same parameters, which it has not.</p> <p>Para 12.15 states in respect of the Sir John Moore Barracks that 'Part of the site comprises 'previously developed land' so it is important to make the full use of the site's potential, within the existing constraints' (Para 12.15, Reg 19 Draft). This is true, and yet the Littleton Nursery, which is 100% brownfield, has not benefited from this weighting and approach of seeking to make use of the site's potential. The LPA's response to this will be that brownfield sites in 'unsustainable' villages were not considered, however, as per this representation, this position belies the facts on the ground and the direct comparisons with the Barracks.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Form (commenting on policy H2)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Letter \(commenting on policy H2\)](#)  
[Form \(commenting on policy H3\)](#)  
[Letter \(commenting on policy H3\)](#)

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Brian Langer
<b>Personal reference number</b>	BHLF-AQTS-32Y8-F
<b>Full reference number</b>	BHLF-AQTS-32Y8-F/1/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	I fully support WCC's intention not to propose a Major Development Area in the area around Micheldever Station
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Shelly Webb
<b>Personal reference number</b>	BHLF-AQTS-32YX-F - Overton Parish Council
<b>Full reference number</b>	BHLF-AQTS-32YX-F - Overton Parish Council/1/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Apologies for not meeting the consultation deadline of 13th October, if possible, please could you include Overton Parish Councils comments:</p> <p>The parish of Overton is under threat from speculative developers who not concerned with our beautiful existing landscapes. Our chalk streams, our crumbling infrastructure or our determination to keep the character of a village that has existed since Saxon times.</p> <p>We are fortunate to have a large brownfield site that will meet the quota of housing required. Though we will still face the strain on an infrastructure that was built - on the requirements of a stagecoach route.</p> <p>The proposed 'Garden Village' at Popham and the proposed 'New town' at Micheldever are both a threat to some beautiful countryside – and to the roads that connect them.</p> <p>There will be no countryside left to enjoy – if fill in developments are given planning approval.</p> <p>OPC supports Winchester District Local Plan in not including development at Micheldever Station.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b>	No

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Michael Culhane
<b>Personal reference number</b>	BHLF-AQTS-32YN-5
<b>Full reference number</b>	BHLF-AQTS-32YN-5/1/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Land at Old Manor Nursery &amp; Old Orchard, Kilham Lane, SO22 5PS (SHELAA ref.WIN09) is a brownfield site. The proposed adjustment to the settlement boundary shown on the Site Allocations Plan (p308) to include WIN09 is supported accordingly.</p> <p>NPPF#70 acknowledges that smaller sites “can make an important contribution to meeting the housing requirement of an area, and are often built up relatively quickly”. Mindful of the ‘brownfield first’ approach championed by the Local Plan, small-scale development opportunities that are below the threshold size for allocation; which would provide infill and rounding off opportunities; that are physically, functionally and visually related to the existing urban areas; should be released through a review of the settlement boundary. This echoes the 2014 Settlement Boundary Review (which formed part of the evidence base for the current Adopted Local Plan Part 2) which added “where there are any obvious and suitable candidates, boundaries could be adjusted to accommodate them and provide a degree of flexibility within the housing supply”. Settlement boundaries should have a degree of permanence to avoid constant change over time. WIN09 is enclosed along the north-west/south-west boundaries by a group of protected trees which visually and physically separate the site from open countryside to the west. When travelling north along Kilham Lane, after WIN09 there is an abrupt end to the urban fabric and a clear transition to a more undeveloped landscape. The tree group creates a logical and defensible boundary to the site and establish a logical and semi-natural edge to the urban fabric.</p> <p>The 2014 Review advised that small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area will be included. Further, it advises that curtilages that are contained, are visually part of the urban area and are separated from the open countryside will also be included. The land at WIN09 continues to meet these criteria.</p> <p>WIN09 is located in a highly sustainable location being walkable to a range of local facilities and services (including primary school – 8 minute walk; convenience store – 6 minute walk), as well as close to a regular bus service (bus stop – 6 minute walk; park &amp; ride terminus – 9 minute walk).</p> <p>WIN09 is not located within a Conservation Area and is not within the setting of any listed buildings.</p>

	<p>The 2014 Review advised that small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area will be included. Further, it advises that curtilages that are contained, are visually part of the urban area and are separated from the open countryside will also be included. The land at WIN09 continues to meet these criteria.</p> <p>WIN09 is located in a highly sustainable location being walkable to a range of local facilities and services (including primary school – 8 minute walk; convenience store – 6 minute walk), as well as close to a regular bus service (bus stop – 6 minute walk; park &amp; ride terminus – 9 minute walk).</p> <p>WIN09 is not located within a Conservation Area and is not within the setting of any listed buildings. see PDF for further information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (Commenting on policy)</a></p>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Sovereign Network Group
<b>Personal reference number</b>	BHLF-AQTS-32YR-9
<b>Full reference number</b>	BHLF-AQTS-32YR-9/1/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>It is considered that the plan needs to allocate more sites to accommodate the required amount of housing in both the plan and the revised standard method which will require a significant increase in housing in the District. SNG is the landowner and prospective developers of the site known as Kings Worthy House and Kings Worthy Court, London Road, Kings Worthy, Winchester SO23 7QA (SHELAA ref: KW04). The site remains available, deliverable and achievable for residential development of approximately 30 dwellings. It is noted in the 2023 Strategic Housing and Employment Land Availability Assessment that the site is considered to have a capacity of approximately 31 dwellings (at a density of 30 dwellings per hectare), which SNG endorses.</p> <p>SNG has submitted a planning application for the redevelopment of the site for the demolition of Kings Worthy Court and redevelopment of 30 dwellings including the alteration/conversion of the Kings Worthy House with 6 apartments, associated car and cycle parking, landscaped areas including public open space, sustainable drainage measures, access and circulation roads (including retained vehicular access from Court Road) and associated works (reference: 24/00103/FUL). SNG is in the process of negotiating the planning application with planning officers and consultees and expects to be able to commence development of the site in 2025.</p> <p>It is noted that the Regulation 19 Local Plan does not propose to allocate the application site for residential development and the purpose of this letter is to object to that omission and request that further consideration is given to allocating the site for residential development for approximately 30 dwellings within the Local Plan. The inclusion of additional smaller sites within the allocations is considered essential to provide delivery whilst the larger allocations, which typically take far longer than expected to materialise, progress through the planning system.</p>

	<p>Furthermore, the revised NPPF standard method could see the housing requirement for Winchester rise by an additional 400 dwellings per annum. This will increase the pressure to provide more housing sites, particularly on previously developed land and at higher densities, still further.</p> <p>The site's most recent use as office accommodation has ended due to the vacation of the last tenants. The buildings on site are not suited to modern office requirements and there is an abundance of good quality office space in the vicinity with the nearest being at Royal Court, Church Green Close, Kings Worthy with vacancies totalling approximately 52,000 sq ft. Prior to commencing the planning application for the redevelopment of the site, the site was marketed for sale and there was no interest from developers to redevelop for employment uses. Given its location within a residential area, and the lack of interest from non-residential developers, it is considered that residential is the most appropriate and achievable use on the site. It would appear from the SHELAA response, that the Council acknowledges the development potential of the site. As detailed in the previous responses the proposed redevelopment would be in accordance with the policies in the draft Local Plan.</p> <p>To reiterate Sovereign is fully supportive of the residential development of the land at London Road (reference: KW04). The site is considered suitable for development as per Policy H3. There are no overriding constraints, and the site is available for development. The site will therefore provide a significant contribution to housing supply in Kings Worthy and Winchester as a whole.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Allocation of more smaller sites including SHELAA reference KW04 and increase the number of dwellings in larger rural settlements (policy H3)</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Form (Commenting on policies)</a>  <a href="#">Letter (Re omission site - Kings Worthy House and Kings Worthy Court)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	YMCA Fairthorne Manor Group   Philipa Spicer
<b>Personal reference number</b>	BHLF-AQTS-328Y-F
<b>Full reference number</b>	BHLF-AQTS-328Y-F/10/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Whilst we support the overall aims of Policy H3, insofar as it seeks to locate development in sustainable locations, we cannot support it entirely. We note that the village of Botley was not assessed as a settlement in the Settlement Hierarchy Report November 2022 and yet Fairthorne Manor is located close to Botley, with good walking and cycling opportunities owing to the new pedestrian and cycle path installed that connects Whiteley with Botley and its train station. As currently drafted, the local plan suggests that Fairthorne Manor and the wider Curdrige area is isolated and forms a lower tier settlement; whereas the reality ‘on the ground’ is very different.</p> <p>The importance of Botley and its influence on Fairthorne Manor needs to be considered and assessed. At present, the evidence base is unsound in our opinion. It is clear from the number of sites submitted to and assessed by the Council that Winchester City Council can provide further opportunities to accommodate a meaningful portion of the anticipated sub-regional unmet need, including on land to the west of Botley, being located in part of the District that falls within the PfSH boundary and being in close proximity to (and with excellent rail connectivity to) both Portsmouth and Havant; these being two LPAs that cannot meet their own housing needs. Our client’s site was put forward as part of the SHELAA for residential development of up to 125 dwellings. The Assessment made by officers found the site to be deliverable and developable, with no insurmountable constraints identified, as provided below.</p> <p>The team has reviewed the site’s potential, and we can confirm that it is our considered view that the site is capable of being developed as part of landscape, heritage and ecology led proposal. We, as a team, would welcome the opportunity to work collaboratively with officers and key stakeholders, including Heritage England to explore the full potential of our client’s site, but we set out our initial thoughts below.</p>

	<p>Notwithstanding the site's relatively clean score on the SHELAA site assessment, and its excellent proximity to Botley, we note that the site is not free from constraints. However, as the population around Fairthorne Manor expands, so too must its facilities. As communities seek out new ways to come together, Fairthorne Manor wants to adapt to this post Covid world, offering greater volume and diversity of activities; from adventurous pursuits, to opportunities to enjoy being together in the natural environment. Equally, many of the existing facilities are tired or coming to the end of their life. To continue to offer high quality, outdoor provision to the communities adjacent to us YMCA need to both expand and enhance their facilities.</p> <p>We also believe that YMCA can use their spacious grounds, extensive value-led approach, and commitment to community engagement, to develop new, low density housing which both supports the local area as well as contributes back into the Fairthorne Manor site, physically, emotionally and financially. YMCA need to ensure they have the financial capital to sustain this jewel in the Hampshire countryside into perpetuity. The Coronavirus pandemic has caused considerable financial harm to the YMCA and they need to wisely utilise their assets to set a more positive and financially stable course for the future.</p> <p>We consider that the site can deliver a sensitively designed development, within a well-screened site, with the highest levels of sustainability owing to the highest standards of construction coupled with the excellent 'walkability' of the site and the generous mix of uses proposed and existing – a true community hub development. As the site is located 'east of Botley' and within the PfSH area, it will be ideally placed to contribute to the anticipated increase in Winchester's level of planned housing land supply that will be required to address the growing level of sub-regional unmet need. As such, given the climate emergency, the cost of living crisis, the ongoing chronic housing affordability crisis; it is right that planners and place makers should explore further sites that are sustainable and achievable.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (Table of policies)</a> <a href="#">Letter (commenting on Policies and Evidence Base - includes vision document))</a> <a href="#">Supporting document 1 (Vision Document)</a> <a href="#">Supporting document 2 (Vision Document)</a></p>
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<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bellway Strategic Land   Daniel Poole
<b>Personal reference number</b>	BHLF-AQTS-3289-F
<b>Full reference number</b>	BHLF-AQTS-3289-F/6/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>By contrast, our client's site (BW12) is the only site promoted that benefits from such an enviable location close to the town centre and is situated between dwellings. In this context we consider that the development of our client's site would provide a logical medium-scale in-fill extension of the settlement.</p> <p>5.59 A diagram taken from the 'Vision' to show the location of the site relative to all of the services and amenities on its doorstep is shown overleaf.</p> <p>36</p> <p>Local services and facilities plan</p> <p>5.60 We note that the Integrated Impact Assessment (IIA) Report (July 2024) shows the Rareridge Lane site (BW17) and our client's site (BW12) as having an identical score. We disagree with this, and we invite officers and indeed we will invite the Planning Inspector to visit both sites to appreciate the stark differences and superiority of our client's site. For ease of comparison, the site assessment scores from the IIA are shown below.</p> <p>Extract of the Integrated Impact Assessment Showing the Assessments of BW12 and BW17</p> <p>5.61 Notwithstanding our view that the scores above are incorrect, the superior proximity of our client's site compared to Rareridge Lane should result in its priority for allocation for new development if the Council is wishing to promote sustainable development and reduce carbon. In our view the site scores for these two sites are as shown below:</p> <p>SiteRef.ParishAddressProposedUseIIA1IIA2IIA4IIA7IIA8IIA9IIA10IIA11IIA12IIA13IIA14BW12Bishop'sWalthamLand adjacent CrownHill House, BotleyRoadResidentialuse+++++?-?0?-00BW17Bishop'sWalthamLand north ofRareridge LaneResidentialuse++++0?---?0?--00</p> <p>37</p> <p>5.62 Our client's site was put forward as part of the SHELAA for residential development of up to 68 dwellings. The Assessment made by officers found the site to be deliverable and developable, with no constraints identified, as provided below.</p> <p>SHELAA Site Pro-Forma for the Appraisal Site</p> <p>38</p>

5.63 The site was assessed by officers and scored very well, with a 'green' score applied to all criteria except two, namely:

- The site is currently situated with the 'countryside' - but this is a matter that would be overcome by a proposed allocation of course.
- The site could potentially be underlain with sand or gravel - but the size of the site, its proximity to existing dwellings and a need to retain the existing hedgerows and trees that frame the site would, in my experience make the exploration of and extraction of minerals unviable due to the size of net area, damaging to the environment and undesirable from a residential amenity perspective.

As mentioned above the site has a relatively clean score on the SHELAA site assessment with a yield of 68 dwellings, excellent proximity to the town centre; but we acknowledge it is located within reasonable distance from Bishop's Waltham Palace and the Allan King Way PROW on the northern boundary of the site.

5.68 As such, and via a dedicated pre-application submission to Heritage England and meeting with their team, we presented a development proposals for the site that were informed by a strong landscape led and heritage led design concept.

5.69 The proposed vision, proposes a landscape edge to the site, with an arterial footpath and public open space route set between interspersed trees and the retained hedgerows that would provide filtered views between new homes and the surrounding landscape and townscape; and provide an attractive and appropriate buffer to the palace ruins and their

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extensive grounds. This approach was welcomed by Historic England and their pre-application comments are appended to these Representations.

5.70 We consider that the site can deliver a sensitively designed development, within a well-screened site, with high levels of sustainability owing to the highest standards of construction coupled with the excellent 'walkability' of the site.

5.71 These Representations demonstrate that our client's site would represent a valuable opportunity for a sustainably located medium-scale in-fill extension to Bishop's Waltham, and can be taken forward without causing any significant adverse effect on the local character and without giving rise to any level of settlement coalescence, or harm to the South Downs National Park.

5.72 We believe that taking this site forward would contribute to the overall need for 10% of dwellings within the Local Plan to come from smaller sites (as set out in paragraph 69 of the NPPF). Allocation of the site for new homes would also contribute to the increased level of housing land supply that Bishop's Waltham can and should be providing as part of its role as the largest and most sustainable settlement outside of Winchester itself.

5.73 Finally, as the site is located within the PfSH area, it will be ideally placed to contribute to the anticipated increase in Winchester's level of planned housing land supply that will be required to address the growing level of sub-regional unmet need.

	5.74 As such, given the climate emergency, the cost of living crisis, the ongoing chronic housing affordability crisis; it is right that planners and place makers should explore further sites that are sustainable and achievable. See additional PDF.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (with table)</a> <a href="#">Letter (commenting on policies - includes tables and pictures)</a> <a href="#">Supporting document 1 (Vision Document - Botley Road, Bishops Waltham)</a> <a href="#">Supporting document 2 (pre-application advice from Historic England)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bargate Homes   Jonathan Quarrell
<b>Personal reference number</b>	BHLF-AQTS-3288-E
<b>Full reference number</b>	BHLF-AQTS-3288-E/6/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Whilst we support the overall aims of Policy H3, we cannot support it entirely. Waltham Chase is scored down due to a flawed assessment. In our view, Waltham Chase has a greater amount of key services and facilities; and yet in our view, not enough development is being proposed around Waltham Chase. Only Morgans Yard is allocated. It is clear from the number of sites submitted to and assessed by the Council that Winchester City Council can provide further opportunities to accommodate a meaningful portion of the anticipated sub-regional unmet need, including on land around Waltham Chase, being located in part of the District that falls within the PfSH boundary and being in close proximity both Portsmouth and Havant; these being two LPAs that cannot meet their own housing needs.</p> <p>Our client's site (SH09) is promoted as a site that benefits from a good location and being free from constraints will be deliverable at pace. In this context we consider that the development of our client's site would provide a logical medium-scale in-fill extension of the settlement. The Integrated Impact Assessment (IIA) Report (July 2024) shows the Morgan's Yard site (SH56) and our client's site (SH09) as having an almost identical score. We disagree with this, and we invite officers and indeed we will invite the Planning Inspector to visit both sites to appreciate the stark differences and superiority of our client's site. The main scoring difference between Morgan's Yard and Forest Farm relates to the fact that Morgans Yard is a brownfield site, and Forest Farm is greenfield land.</p> <p>This score of IIA12 is effectively balanced out by the fact that Morgans Yard is a current employment site, and its loss to residential scores negatively. This effectively leaves the criteria of IIA10 and IIA11, and we note that both the scores for Morgans Yard and Forest Farm both show uncertainty in the likely effect. The result is that, the two sites scores are almost identical overall.</p>

	<p>In addition to Bargate Home’s in-house design team, our client has appointed a full sub-consultant team to promote the site, and this includes planning consultants, heritage consultants, landscape architects and transport planners. The team has reviewed the site’s potential, and we can confirm that it is our considered view that the site is capable of being developed as part of a landscape led proposal. As mentioned above the site has a relatively clean score on the SHELAA site assessment with a yield of 131 dwellings with good proximity to daily services and facilities (as evidenced by the Settlement Hierarchy). We have reviewed the initial work and master planning prepared by the design team, and for reasons of brevity, we will not extol the virtues of the Forest Farm Site here.</p> <p>These Representations demonstrate that our client’s site would represent a valuable opportunity for a sustainably located medium-scale extension to Waltham Chase, and can be taken forward without causing any significant adverse effect on the local character and without giving rise to any level of settlement coalescence, or harm to the South Downs National Park. We believe that taking this site forward would contribute to the increased level of housing land supply that Waltham Chase can and should be providing as part of its role as a growing settlement outside of Winchester itself.</p> <p>Finally, as the site is located within the PfSH area, it will be ideally placed to contribute to the anticipated increase in Winchester’s level of planned housing land supply that will be required to address the growing level of sub-regional unmet need. As such, given the climate emergency, the cost of living crisis, the ongoing chronic housing affordability crisis; it is right that planners and place makers should explore further sites that are sustainable and achievable.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Form (commenting on policies and evidence base)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Letter \(commenting on policies and evidence base - includes pictures and tables\)](#)  
[Supporting document 1 \(Map of site - Land at Winchester Road\)](#)  
[Supporting document 2 \(Briefing note - Winchester Settlement Gap\)](#)

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	BHLF-AQTS-328D-T
<b>Full reference number</b>	BHLF-AQTS-328D-T/3/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H3: Spatial Housing Distribution sets out how housing development will be distributed across the District. This establishes the Settlement Hierarchy, whereby housing provision is directed to the most sustainable settlements. Denmead is designated as a Larger Rural Settlement, reflecting the wide range of services and facilities in the village. While this hierarchical approach to the distribution of development is broadly supported, as set out later in these representations, it is considered that the amount of housing should be increased to reflect the facilities and services available in Denmead. This could be effectively achieved by increasing the number of dwellings to be delivered through direct allocations.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Bargate Homes consider that the plan should be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for a number of reasons, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing, which is considered further below.</p> <p>Policy H3 should be amended to increase the amount of housing to be delivered through new allocations in Larger Rural Settlements. The revised number should be based on up to date evidence in relation to capacity and supply. See submission for full details</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Bargate Homes consider that the plan should be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for a number of reasons, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing, which is considered further below.</p> <p>Policy H3 should be amended to increase the amount of housing to be delivered through new allocations in Larger Rural Settlements. The revised number should be based on up to date evidence in relation to capacity and supply. See submission for full details</p>
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on Policies and Evidence Base - includes pictures)</a> <a href="#">Letter (commenting on Policies and Evidence Base - includes pictures)</a>



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/14/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Gladman support the proposed spatial distribution of housing across the district which ensures the future sustainability and prosperity of all settlements in the hierarchy.</p> <p>Otterbourne has been allocated 77 dwellings between 2020-2040, with 55 dwellings allocated to Policy OT01: Land east of main Road. Gladman welcome this allocation which reflects Otterbourne's sustainability and the context that the settlement was not directed development within the adopted Local Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Supporting information (commenting on policies and proposed site)</a></p>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Croudace Homes
<b>Personal reference number</b>	BHLF-AQTS-328A-Q
<b>Full reference number</b>	BHLF-AQTS-328A-Q/5/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website.</p> <p>Strategic Policy H3 sets out the housing proposed for each spatial area as follows:  It is noted that Wickham is included in the 'Large Rural Settlements' spatial area and only just over a third of the housing provision for the area is coming from new proposed housing allocations. The housing sources for Wickham are set out on Page 453 of the Regulation 19 Local Plan and confirm that in fact only 100 homes of the 356 provision in Wickham are from new allocations. It is highlighted that Wickham is a sustainable settlement with many facilities and services with good connections to larger settlements and therefore it has capacity to take further growth.</p> <p>3.28 We fully support the allocation of the land at Southwick Road for 60 homes (indicative figure) in the Regulation 19 Local Plan. However, the inclusion of the land known as Ravenswood (Policy KN1) for 200 homes is questioned as to whether such provision should be counted in the housing numbers for the Local Plan. An outline planning application was submitted for the community led proposal to develop 200 new homes including affordable housing, with associated access, landscaping, parking and open space in 2018. The planning application is still pending a decision due to the requirement for a Section 106 agreement to be signed. As set out in paragraph 3.10 above, if there are concerns about the deliverability of sites, they should not be included as housing allocations.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Stuart Crossen
<b>Personal reference number</b>	BHLF-AQTS-328V-C
<b>Full reference number</b>	BHLF-AQTS-328V-C/5/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Land at Lanham Lane is an omission site which is put forward to assist in rectifying the significant soundness issues identified in relation to the draft plan. Kler Group Limited has been promoting the site since 2020, with the intention of assisting the Council in delivering housing in the emerging plan period so as to meet strategic requirements. The site is located at the western urban edge of Weeke that forms the western residential suburbs of Winchester. The site extends to approximately 9.5ha (23.4 acres), comprising of an irregular shaped arable field. The site is bound to the north by Deans Lane, to the east and southeast by residential development and open countryside to the north and west.</p> <p>In relation to settlement and built form, the site shares an immediate relationship with the western urban fringe of Winchester. Beyond the urban edge, built form is limited to a row of properties along Westview Road located west of the site. In terms of infrastructure the site sits south of the B3049 and B3420. The closest bus stop is presently located approximately 271m from the site and Winchester railway station is located approximately 1.9 miles east of the site. The site is not presently located within any land designations and is considered to be open countryside. There are no statutory heritage assets within or directly adjoining the sites boundary. The closest heritage asset to the site is Dean Prior, a Grade II Listed Building, however it is considered that due to existing built form and the distance from the site, this proposal would not impact the Listed Building.</p> <p>The ecological appraisal has been informed by a desktop study and ecological walkover of the site. Residential development at the site is unlikely to significantly impact upon any statutory ecological designations in the local area. Subject to a sensitive scheme design and buffering on site which will incorporate semi-natural habitats and potentially include SuDs. The on-site habitats are unlikely to pose a constraint to development, subject to the retention of exiting boundary vegetation wherever practicable. Consideration will need to be given to opportunities to achieve biodiversity net gain on site.</p>

	<p>The site is not within a Conservation Area; accordingly, the amenity value of the trees is not elevated to preserving or enhancing any unique or distracting interest linked to the setting. The assessment considers the landscape and visual baseline setting of the site, the location of the site and associated value, and the visual setting of the site through the consideration of a series of views. A Built Heritage and Archaeology Constraints and Opportunities Assessment has been prepared by RPS. The assessment considers the extent and nature of known heritage assets within the Study Site and surrounding area, providing relevant and up to date evidence to support the promotion of the Study Site for residential allocation.</p> <p>The site is located to the west of Winchester and has a frontage onto Lanham Lane. Lanham Lane runs from south to northeast along the eastern site boundary. The site is well located for travel by sustainable modes, with schools, employment, recreation facilities and key amenities all located within 2km pedestrian catchment from the site access. At the southern site boundary Lanham Lane is a Bridleway, and there is scope to provide a pedestrian and cycle connection to the Public Rights of Way network in this location. Access to the site would be taken via an extension of Teg Down Meads into the site at its junction with Lanham Lane, and the creation of a priority crossroads with junction table where Lanham Lane forms the minor arms. Both the junction and the required visibility splays can be achieved within the highway boundary or land under the control of the developer.</p> <p>In part policy H3 replicates the provisions of Policy SP2, which we have objected to elsewhere in these representations. Those objections – focussed upon the distribution of housing between the three spatial planning areas – apply in relation to H3 (in essence, the distribution should have a greater focus upon Winchester Town). For Winchester Town, of the 5,670 dwellings (which should be expressed as a minimum, and increased to reflect our objections to SP2), the requirement to allocate will similarly need to be increased from 7,747 dwellings to reflect our objections to H1.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Macra Ltd
<b>Personal reference number</b>	BHLF-AQTS-328W-D
<b>Full reference number</b>	BHLF-AQTS-328W-D/3/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>The Winchester District PSLP is not at present positively prepared on grounds that it does not seek to plan for its objectively assessed needs in full, but rather leaves to chance the delivery of ‘windfall development’ in settlements including Wickham, which have very limited, if any realistic opportunities which could come forwards in the plan period to deliver the quantum of homes suggested (50 homes). The PSLP also does not demonstrate clearly that appropriate regard has been had for the direction of the Framework to ensure that local people have the chance to shape the future of their area, and indeed Wickham and Knowle Parish Council have appropriately sought to engage with the process in undertaking public consultation and seeking the opinion of local persons on where they consider Wickham settlement should be seeing growth and where opportunities exist to deliver a highly sustainable and connected community for the future. The Parish Council have been clear that their preferred site is Land at Mayles Lane, Wickham (WI24) and indeed have engaged with Winchester Council to seek appropriate changes to the PSLP to reflect this. There is clear justification for the Parish Council’s approach, and the Council have offered no clear rationale why the site should not be progressed.</p> <p>We consider that the PSLP as drafted does fail some elements of the basic tests of soundness as set out at Paragraph 35 of the NPPF. We do however consider that this is a matter that can be appropriately rectified either pre-submission, or following submission to the Planning Inspectorate as part of the Examination in Public. We ask the Inspector, if the PSLP is submitted in its current form for Examination in Public (EIP), to invite the Council to review the proposed strategy for Wickham settlement having regard for the detailed submissions of Wickham and Knowle Parish Council, and the representations herein made in respect of Land at Mayles Farm, Wickham.</p> <p>Land at Mayles Farm, Wickham measures approximately 32.34 hectares (79.91 acres) and comprises two parcels of land, one to the east and one to the west of Mayles Lane. The site lies to the south of the larger</p>



rural settlement of Wickham and is located within the settlement gap positioned between the individual statements of Wickham, Knowle and Welborne Garden Village. The site is currently located outside of the defined settlement boundary and is therefore within 'open countryside' for planning purposes, however it is closely and strongly related to the existing built area of Wickham, and has built influences to the north, east and west, with ribbons of development present along both Mayles Lane to the west and Hoad's Hill to the east.

The site is well located in a sustainable and accessible position, south of the village. Whilst Mayles Lane does not feature a pavement, there are opportunities to create pedestrian linkages to enhance accessibility. Mayles Lane is subject to a 30mph speed limit and there are bus stops located on the junction between Mayles Lane and the A334 Fareham Road. Whilst the site is currently located outside of the defined settlement, as noted it is well related to the village of Wickham, abutting its southern boundary and within a short walking distance of local services and facilities within the core of the settlement. The site is sustainably located in this respect and provides clear opportunities to deliver both new and upgraded pedestrian and cycle links to support sustainable means of travel.

Wickham is a thriving rural village with a number of local shops, services, facilities and amenities. This includes a recreation ground, garage and convenience store, a county store/farm equipment supplier, a shopping centre, convenience stores, a number of pubs, cafes and restaurants, a hotel, skatepark, church, primary school and community centre. The area is well served by public transport, with a number of bus stops located around the village. Having regard for the proposed spatial strategy of the PSLP, it is clear that there is a need for housing growth at Wickham. The settlement has been allocated a minimum of 150 homes as part of the proposed spatial strategy, with 100 homes currently indicated to be delivered on strategic sites, and a further 50 required by windfall development.

The development of Land at Mayles lane, Wickham would comprise a logical expansion of the village, contributing to its future viability whilst preserving and respecting the important visual gap between Wickham, Knowle and Welborne Garden Village. The development would sit betwixt with other residential development along Mayles Lane and Hoad's Hill and would round off the southern boundary of Wickham settlement as opposed to creating a new projecting figure of development out into the landscape. alongside this the development would deliver significant public open greenspace preserving and ensuring the retention in perpetuity of the open gap between the settlements. There are clear and significant benefits which would be derived from the allocation of Land at Mayles lane, Wickham.

A Framework Masterplan has been prepared for Land at Mayles Farm, Wickham, by Pegasus Group and is submitted alongside this representation for the EIP Inspector's reference. The Framework Masterplan

	<p>indicates how the site might be brought forward for strategic development, comprising a scheme of around 100 dwellinghouses, and alongside this the delivery of a significant provision of public open greenspace. The Landscape Visual Impact Assessment (LVIA) prepared by UBU Design is enclosed alongside this representation for the EIP Inspector's reference. As a result of the development, the settlement gap between Wickham, Knowle and Welborne Garden Village would still be maintained at over half a kilometre, where measured from the bottom edge of the development to the northern edge of the Welborne Garden Village development.</p> <p>We consider that Land at Mayles Farm, Wickham comprises the best opportunity for housing growth at Wickham settlement, and we invite the EIP Inspector to consider allocating the site as an omissions site, having regard for the clear support from Wickham and Knowle Parish Council and the significant public benefits which would arise from the delivery of this site and a comprehensive and connected approach being taken regarding the provision of public open greenspace which will permanent preserve the settlement gap between Wickham, Knowle and Welborne without prejudice to its purposes or function.see PDF for further detail</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Form (listing policies and submitted document)</a>  <a href="#">Letter (commenting on Policies and Evidence base)</a>  <a href="#">Supporting documents (Landscape Appraisal and Maps)</a></p>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/15/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates broadly supports the spatial strategy, as set out in these submissions, but believes that there is clearly greater capacity for development in Winchester District.</p> <p>Omission site: Land to the rear of Thody's, New Farm Road, New Alresford.</p> <p>10.1 As is set out at the beginning of these submissions Wates is of the firm view that Land to the rear of Thody's, New Farm Road is a suitable, sustainable, and deliverable site for residential development.</p> <p>10.2 Wates' opinion of the site is supported by the assessment of the site in the Strategic Housing &amp; Economic Land Availability Assessment (SHELAA). Under reference NA01 where the conclusion is that:</p> <p>"The site is deemed as deliverable/developable."</p> <p>10.3 Wates' notes that the majority of environmental constraints, historical constraints, policy constraints and physical constraints are 'scored' as a 'green' in the SHELAA assessment. This effectively means there are only very limited negative effects identified.</p> <p>10.4 The only 'amber' concerns are about: Tree Preservation Orders; the site's countryside location (outside the settlement boundary); a Waste Consultation Zone; archaeology and access (all matters that can be managed and mitigated through development).</p> <p>10.5 On the face of the SHELAA assessment — there are no impediments to development of the site. see PDF for further detail</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The Council should, in light of the increased housing needs identified in these submissions, and foreshadowed in the WMS, adjust the housing targets and distribution in proposed Strategy Policy H3.</p> <p>8.20 Land to the rear of Thody's should be allocated for development.</p>
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/16/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant Yes</p> <p>Positively prepared Yes</p> <p>Sound No</p> <p>Justified No</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective No</p> <p>Compliant with national policy Yes</p> <p>8.18 Wates broadly supports the spatial strategy, as set out in these submissions, but believes that there is clearly greater capacity for development in Winchester, and in Sutton Scotney.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The Council should, in light of the increased housing needs identified in these submissions, and foreshadowed in the WMS, adjust the housing targets and distribution in proposed Strategy Policy H3.</p> <p>8.20 There is greater capacity for development at Land at Brightlands.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (Commenting on policies)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/15/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Wates broadly supports the spatial strategy, as set out in these submissions, but believes that there is clearly greater capacity for development in Winchester. Wates, however, firmly believes that Winchester has a greater capacity for development than is presented in the Local Plan, not least if Pudding Farm is included as an allocation. This would reflect the proposed allocations W2 – Sir John Moore Barracks and W4 - Land West of Courtenay Road, which are both in 'strategic gaps' but these gaps do not outweigh the need for new homes. Increasing allocations at Winchester could go some way to meeting the potential under supply identified in these submissions. Wates also notes that central Winchester brownfield sites have a long history of non-delivery, therefore more greenfield sites will be needed to bolster delivery: All of which would help to ensure development is s delivered in the most sustainable locations.</p> <p>Wates also believes that its vision for Pudding Farm aligns with the Council's aspirations for Winchester. As is set out in the Vision Document, the site can provide housing, as a scale that provides for some local needs, but can deliver quickly and critically, the housing can be provided alongside significant areas of open space that will preserve the urban edge of Winchester and avoid merging into any surrounding settlements. Being specific about the justification of 'green gaps', their function and quality is necessary in policy and can be enshrined through a site-specific allocation which delivers specifically protected open space – rather than a potential arbitrary open space or settlement boundary. Pudding Farm, Worthy Road. Pudding Farm, Worthy Road is a suitable, sustainable, and deliverable site for residential development.</p> <p>There are no known constraints which would prevent development in this location. The site is well related to Winchester and would constitute sustainable development in an area where there is an identified local housing need. Wates has competed a considerable amount of work to date such that they could, if the site were allocated, proceed to submit a planning application in a timely fashion. Wates has a</p>



	<p>good track record in progressing the development of their sites in a quick and efficient manner therefore the site is capable of being delivered swiftly.</p> <p>Wates has reviewed the supporting Integrated Impact Assessment (IIA) for the Local Plan and is concerned that there is a lack of consistency between the SHELAA site assessments and those in the IIA. Many of the sustainability challenges identified in the IIA are either overstated, entirely manageable or mitigatable, or have not been appropriately balanced with the benefits of development. Having reviewed the IIA; Pudding Farm, Worthy Road would appear to be appropriate to allocate for development. None of the constraints to development are insurmountable, and in fact, much of the assessment supports the sites as suitable and sustainable for development. The vision document at Appendix A of these submissions clearly demonstrates how development can be sustainably delivered at Pudding Farm, Worthy Road, and it is respectfully requested that it is allocated in the Local Plan.</p> <p>Land at Pudding Farm provides an excellent opportunity to deliver new housing and/or Care Village very close to local supporting facilities including Winchester city centre. In addition to providing much needed new housing in a suitable location, the site offers the opportunity to create a new country park and/ or solar farm to help the Council to achieve carbon neutrality, increase biodiversity and the health and wellbeing of its residents. The Land at Pudding Farm is a small to medium sized site which the NPPF clarifies, at paragraph 70, can make an “important contribution” to meeting housing requirements, as it can be built out relatively quickly and is not reliant on significant infrastructure delivery. Within this context, first consideration should be given to the Land at Pudding Farm. Vision document is available to view on the Local Plan website.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The Council should, in light of the increased housing needs identified in these submissions, and foreshadowed in the WMS, adjust the housing targets and distribution in proposed Strategy Policy H3. 8.20 Land at Pudding Farm should be allocated for development.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Form (refers to letter)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Letter \(Commenting on policies\)](#)

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Montare LLP & Weatherstone Properties Ltd
<b>Personal reference number</b>	BHLF-AQTS-328J-Z
<b>Full reference number</b>	BHLF-AQTS-328J-Z/1/H3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	See report and appendix for full details. Disagree with the council's overall development strategy. Also recommend that the council pause work on the local plan and await the new NPPF which will undoubtedly require more site allocations to be identified. The site being promoted at Olivers Battery should be included as a site allocation in the emerging local plan.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	See report and appendix for full details. Include the site being promoted as an allocation for residential development and open space/bio-diversity area
<b>What is your suggested wording or text for the policy?</b>	The promoted site should be added to the list of allocated development sites.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (commenting on policy - response detailed in letter)</a> <a href="#">Letter (commenting on policies and site promotion)</a> <a href="#">Supporting Information (Land at Texas Drive, Oliver's Battery)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Ibex Homes Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QE-M
<b>Full reference number</b>	BHLF-AQTS-32QE-M/5/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H3- Spatial Housing Distribution  OBJECT -  see additional PDF for further information  2.17 Ibex supports and agrees with the spatial distribution of housing and in turn the hierarchy of settlements. Bishops Waltham is a Market Town, along with New Alresford. Market Towns are highly sustainable settlements, with a number of shops and services and serving populations in the area rather than just the settlement itself. It is Ibex's opinion that Bishop's Waltham is capable of delivering more than the current allocated 100 units at Land North of Rareridge Lane.  It is clearly evident that Winchester needs to find further housing sites and Market Towns are capable of accommodating this growth, in particular Bishop's Waltham.  2.19 The Council face needing to find additional sites to meet their plan housing needs and increasing the housing requirements for Bishop's Waltham as a sustainable settlement, high in the settlement hierarchy. is a logical and reasonable method of increasing housing supply during the plan period.  OMISSION SITE - Mitre Building, Botley Road.  Ibex Homes Limited own a site west of Botley Road called the Mitre Building. The Mitre Building is currently in business use. Ibex wish to promote the site for residential uses, capable of contributing 5 units to the housing land supply.  3.2 The current building is not capable of conversion and therefore the promotion of the site is on the basis of demolition of existing building and structures and the construction of 5 sympathetically designed new build dwellings.  3.3 The Mitre Building is set within a small enclave of buildings which are all in residential use. Returning this site to residential use, and subject to a sensitively designed scheme at planning application stage, would be entirely compatible with the character and appearance of the area.  3.4 No new vehicle access would need to be provided, with utilisation and formalisation of the existing access serving Mitre Building and Thickets House, and Thickets Lodge. The promotion site is also capable of connecting to the existing infrastructure network, subject to any necessary local upgrades.</p>

	<p>3.5 The site is located in Flood Zone 1 and is not subject to any statutory or local designations. There are, therefore, no technical constraints to delivering the site. It is a logical, available, deliverable and achievable site for residential development within an existing residential area.</p> <p>3.6 The Mitre Building should be considered for allocation during the main modifications stage of the plan, as it is necessary for the Council to re-consider and boost housing delivery during the plan period, especially within the first five years of plan adoption due to the increase in housing need through the new (currently draft) proposed Standard Method under the NPPF, as set out in Section 2 of these Representations. In order for the Plan to be found Sound and Legally Compliant there are a number of fundamental changes required:</p> <p>4.1.1 Change 1 - Soundness: There is a need to revisit the minimum housing requirement in the Plan in line with the evidence base and in particular dealing with unmet need and the worsening affordability in the district.</p> <p>4.1.2 Change 2 - Soundness: The Council must revisit its housing delivery strategy and address the clear shortfall in supply across the whole Plan period and particularly within the first 5-years through the allocation of more sites that are ready and able to deliver in the early part of the Plan period.</p> <p>4.1.3 Change 3- Soundness: The Council is required to review and amend the policies in relation to the representations made in Section 2.</p> <p>4.1.4 Change 4 – Soundness: Ibex Homes Limited Promotion Site, Mitre Building, Botley Road, should be allocated for approximately 5no. Dwellings and is capable of delivery in the first 5-years of the Plan</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on letter and proposed site)</a>  <a href="#">Supporting information (Location Plan)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/9/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Harding Holding supports and agrees with the spatial distribution of housing and in turn the hierarchy of settlements. Bishops Waltham is a Market Town, along with New Alresford. Market Towns are highly sustainable settlements, with a number of shops and services and serving populations in the area rather than just the settlement itself. Bishop’s Waltham is capable of delivering more than the current allocated 100 units at Land North of Rareridge Lane.</p> <p>Harding Holding Limited own a site east of Botley Road, abutting the town centre. It is currently used as pastureland and the farm buildings lay redundant. The land is currently unmanaged. Harding Holding are owners of the land show wish to promote the site for residential development of upto 100 units, for business uses within the converted redundant farm buildings, and for supermarket retail use. This promotion site is capable of delivering retail uses within walking distance of the town centre, in highly sustainable location. The development of the site for the proposed uses would result in planning benefits beyond that which would normally be required of a planning application.</p> <p>A new supermarket in Bishops Waltham would allow the retention of business within the town and prevent both the flow of people and their money to places outside the district or in a car to larger shopping areas. Bishop’s Waltham has a very limited retail offer for grocery consumption, there is one single small supermarket, Sainsburys, in the town, but Harding Holdings research (available on request) demonstrates a large migration of local spending, well outside the 20minute neighbourhood but also into adjacent districts. Grocery retail development would support WCC’s ambitions for 20minute neighbourhoods, alongside other business uses.</p>



	<p>Botley Road has no footpath beyond Bishops Lane and there is insufficient land within the highway to provide one. The site will provide a connection from Bishops Lane and also connect with other footpaths adjacent to the site including a PROW. This would include providing a safe cycle access to the site.</p> <p>Thickets Farm includes farm barns and stores, all of which are redundant. The re-use of these buildings for commercial uses would involve development on brownfield land and reduce the need for the Council to allocated green field sites.</p> <p>The Promotion Site location is highly sustainable. Land West of Botley Road, Thickets Farm, is a logical site for development, and for allocation in the Winchester District Local Plan. It is a site that is available for development and if developed would deliver significant planning benefits to the community and the economic vitality of Bishop's Waltham and the wider district, alongside delivering much needed housing including affordable housing. There are no known technical constraints for the site, that cannot be managed or mitigated in the application process. Further surveys would be required, but these are only required to provide sufficient confidence for Planning Officers at any future application stage.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (Commenting on policies and evidence base)</a>  <a href="#">Supporting information (Map)</a></p>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Persimmon (South Coast)
<b>Personal reference number</b>	BHLF-AQTS-32Q9-8
<b>Full reference number</b>	BHLF-AQTS-32Q9-8/2/H3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	See report for full details. It is considered that the council's development strategy is unsound and the site being promoted at Land North of Anmore Road should be included as a site allocation.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	See report for full details. We consider that the Council has not considered all reasonable alternatives in its spatial strategy, and should be considering further sustainable sites, especially in the rural areas to the south of the District, within the PfSH sub-region. The Site north of Anmore Road, Denmead, would make a valuable contribution to the supply of housing adjacent to a sustainable settlement. It would contribute to the PfSH housing market need which is has a significant unmet housing need.
<b>What is your suggested wording or text for the policy?</b>	Include the site 'Land North of Anmore Road, Denmead in the list of development allocations.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (Copy of form - refers to letter)</a> <a href="#">Supporting document 1 (Commenting on policies and proposed site)</a> <a href="#">Supporting document 2 (Vision document - Land North of Anmore Road, Denmead)</a>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Croudace Homes (Alison Walker)
<b>Personal reference number</b>	BHLF-AQTS-32QZ-9
<b>Full reference number</b>	BHLF-AQTS-32QZ-9/6/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Croudace supports the concepts of spatial distribution and the hierarchy of settlements. It does not however agree with the Council’s distribution of dwellings for Larger Rural Settlements as it is its opinion that it is quite evident those settlements are capable of delivering more than indicated in the table in Policy H3. These settlements are well serviced, with schools and a range of medical facilities, shops and community facilities. They are capable of supporting increased housing in a sustainable manner. It is clearly evident that Winchester CC needs to find further housing sites and Larger Rural Settlements are capable of accommodating this growth, in particular Colden Common.</p> <p>Land East of Highbridge Road (SHELLA Reference: CCO3) has not been allocated in the Winchester Local Plan. It is a sustainably located site in the envelope of the existing settlement of Colden Common and close to all the village’s main services and facilities. It is a site that was not selected by the Parish Council when the City Council asked it to narrow the outcome of the SHELAA, which produced 11 sites. There is no technical reason as to why this site was rejected and was chosen through local preference alone. The site is comparable in the IIA outcomes to proposed allocated sites. The Development Strategy and Site Selection 2024 Topic Paper includes the email response from the Colden Common Parish Council which confirms that there is no technical reason, rather a deemed landscape sensitivity.</p> <p>Winchester CC is facing a significant increase in housing need so for the reasons stated in Section 4 of this representation, it is clear that further housing is required for this plan to be sound. The site at Land East of Highbridge Road, Colden Common, represents a reasonable, logical, sustainable site to be allocated to provide additional housing in the context of the Plan’s immediate review, the site should be allocated in this plan. Noting the Parish Council’s concerns about landscape, Croudace has instructed a Landscape Consultant to provide advice and contribute to the indicative masterplan and Vision Document that accompanies this Representation. The detailed appraisal of Croudace’s site confirms that it does comprise a</p>

	<p>suitable and sustainable location for accommodating housing (a conclusion the Council's SHELAA does not necessarily disagree with) and that the technical concerns raised by the Council can be appropriate addressed through a sensitive residential development proposal. Furthermore the technical appraisal work has determined that a number of material planning benefits can be delivered for the local community alongside additional housing.</p> <p>Land East of Highbridge Road is a logical site for development, and for allocation in the Winchester District Local Plan. It is site that is available for development and if developed would deliver significant planning benefits to the community, alongside delivering much needed housing. The masterplan has been design led with significant input from the start from heritage and landscape specialists in order to develop a scheme that respects the character, appearance and history of the site's context. There are no known technical constraints to development that cannot be satisfactorily/sensitively mitigated. Further surveys are required, but these are only required to provide sufficient confidence to Planning Officers at any future application stage.</p> <p>The site has previously scored very well in the IIA, and comparable with other allocated sites in the plan in Colden Common on IIA outcomes. It has not been allocated because of the Parish Council's perceived, and untested, conclusions regarding landscape sensitivities. The Parish Council did also not consider the sustainability of the site. Given the need for further planned housing, based on the representations made in section 4 above, this site represents a logical and deliverable site for Winchester CC to allocate through the main modifications process. see PDF for further information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Form (refers to letter)</a>  <a href="#">Letter (commenting on policies and evidence base)</a></p>

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 1 \(Vision Document\)](#)

[Supporting document 2 \(Map - Land east of Highbridge Road, Colden Common\)](#)

[Supporting document 3 \(Indicative layout\)](#)

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Hannah Young
<b>Personal reference number</b>	BHLF-AQTS-32QC-J
<b>Full reference number</b>	BHLF-AQTS-32QC-J/4/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The Site promoted by Persimmon comprises circa. 10.2 ha of land to the east of Botley railway station (Site CU15). The site is bound by the railway line to the south, Outlands Lane to the east and the A334 to the north. It comprises agricultural land which as set out in the Call for Sites submission is of low ecological value.</p> <p>2.1.2 Botley Railway Station lies immediately to the west of the site, providing direct and regular services between Portsmouth and London. In close proximity to the railway station is a petrol station with an associated convenience retail store; alongside an established employment site at Hillsons Road, to the south of the railway line.</p> <p>2.1.3 Curdrige village is located to the north of the site. The Plan identifies Curdrige as a Rural Area settlement with no defined settlement boundary.</p> <p>2.1.4 Botley is located to the west. This is located in Eastleigh District, and is a Tier 3 settlement (below Eastleigh, a Tier 1 settlement; and Chandler's Ford and Hedge End; Tier 2). Botley is established and offers a range of services. The Persimmon Site has a logical relationship with Botley, accessed directly via the A334.</p> <p>2.1.5 Botley Bypass is a new strategic 1.8 km road which extends from Winchester Street eastwards, crossing the River Hamble to a new roundabout at the junction between the A334 and the A3051, which is located to the south of the</p> <p>Persimmon Homes is one of the UK's most successful housebuilders, committed to the highest standards of design, construction and service. With its headquarters in York, the Group is made up of a network of 29 regional operating businesses to allow national coverage. Persimmon has a proven record of being able to deliver dwellings in a timely manner to meet the needs of planning policy.</p> <p>2.2.2 Persimmon South Coast is promoting the site East of Botley Station (SHELAA Site CU15) for residential purposes. Persimmon has contracted with the landowner to</p>



	<p>promote this Site on their behalf.</p> <p><b>2.3 DEVELOPMENT POTENTIAL</b></p> <p>2.3.1 As detailed in the Call for Sites, Persimmon is promoting a sustainable, residential led housing development on the site which can be delivered in the short term (i.e. within the next five years).</p> <p>2.3.2 A number of technical assessments have been carried out including into matters such as access, ecology, tree survey and drainage. These reports demonstrate that technical solutions to these matters can be designed into the scheme and there are no technical constraints which prevent development of the site. Further, this work has identified the opportunities and constraints which have informed the concept masterplan for the site. These reports have been provided to the Council previously and are therefore not included as part of this Consultation Response.</p> <p>2.3.3 It is anticipated that around 8 ha of the c. 10.2 ha site is suitable for residential development; taking into account the need for on-site open space, avoiding areas at risk from surface water flooding and leaving a noise buffer along the railway line. This provides the opportunity for between 250-350 dwellings based on an average density of c. 30-40dph which is considered appropriate for settlements such as Curdridge.</p> <p>2.3.4 Access is anticipated along the north western perimeter of the site boundary, served by a “bellmouth” junction with a right turn lane designed in accordance with CD 123 guidance. This would also provide the opportunity to improve pedestrian connectivity by providing a pedestrian refuges island across the A334.</p> <p>2.3.5 A second access onto the A334, located further to the east, has also been identified; to work in conjunction with the preferred access or as a standalone access for a smaller quantum of development.</p> <p>2.3.6 There are opportunities to improve exiting pedestrian routes for residents on Outlands Lane to the station and Botley village. This would be incorporated into the scheme. site. This has funding committed and is under construction.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (commenting on policies and proposed site)</a> <a href="#">Supporting document 2 (site deliverability statement)</a>



<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/44/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	No, I don't agree
<b>If no, please explain</b>	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
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies, policies map and evidence base)</a> <a href="#">Vision document (Land At Mill Lane, Wickham)</a>

<b>Policy/Evidence base document</b>	H3
<b>Name of respondent (or client)</b>	Tom Bell
<b>Personal reference number</b>	BHLF-AQTS-32Q2-1 - Portsmouth City Council
<b>Full reference number</b>	BHLF-AQTS-32Q2-1 - Portsmouth City Council/6/H3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The Standard Methodology has been used by Winchester City Council (WCC) to calculate a housing need of 13,565 additional dwellings within the District for the 2020 to 2040 Plan period. Further to this, Winchester has established a buffer of 1,900 homes to cater for unmet need in neighbouring authorities in South Hampshire. This additional buffer increases the total housing provision to 15,465.</p> <p>Winchester shares a common boundary with Portsmouth and the last Strategic Housing Market Assessment prepared by PfSH noted that some of the District's southern wards are in the Portsmouth Strategic Housing Market Area. The Portsmouth HEDNA (para 1.14 / 1.21) (Iceni 2023) agrees with the finding of an earlier 2014 study by GL Hearn which identified a Portsmouth HMA which included all of Portsmouth, Gosport and Havant as well as the eastern wards of Fareham Borough, the southern wards of Winchester District and parts of East Hampshire District. Both the City and District Councils have worked closely together as part of PfSH. Portsmouth intends to submit a Local Plan with a capacity-based housing target of 680 dwellings per annum totaling 13,603 dwellings over the 20 year plan period. This is a shortfall of approximately 4,377 dwellings over the plan period compared to the Council's Standard Method number of 899 per annum.</p> <p>The City Council has previously requested that its neighbours accommodate a portion of its unmet need. This included Fareham Borough Council, which agreed to accommodate 800 dwellings of unmet need from the city in its emerging Local Plan. These 800 dwellings help to reduce the 4,377 dwelling shortfall identified. The City Council would therefore like to reiterate the request made in the response to Winchester's Regulation 18 plan in December 2022, in its letter dated 11 January 2024 to Winchester City Council and referenced in the Statement of Common Ground between the two authorities (August 2024) that Winchester City Council earmarks a meaningful portion of its housing buffer towards meeting unmet need of the City of Portsmouth.</p> <p>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.</p>

	<p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul> <p>This suggested apportionment reflects that Portsmouth City, Havant Borough, Fareham Borough and the southeastern parishes of Winchester District fall within the same housing market area. The apportionment also reflects that PCC have been already allocated 800 dwellings towards unmet need by Fareham Borough Council in their adopted Local Plan. PCC considers that specific proportions and numbers provide additional certainty on the distribution of housing for the LPAs. The proposed apportionment will be subject to change in the event that an additional ask is made of Winchester regarding any unmet need or the housing target and/or unmet need allowance in the Winchester District Local Plan changes in the course of its examination.</p> <p>- Official Sensitive -</p> <p>It is proposed that the above is included in an addendum to the Statement of Common Ground between the two authorities to be agreed, signed and published in our respective Core Document Libraries.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

Local Plan Reference or document	Policy H4 Development Within Settlements	
Total Number of Representations received	21	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	9	4
Sound	4	14
Complies with Duty to Cooperate	10	3
<p><b>Summary of Representations</b></p> <p>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.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BCM-X/1/H4</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/61/H4</b></p> <p>ANON-AQTS-3BJD-V/7/H4</p> <p>ANON-AQTS-3BSY-T/81/H4</p> <p>ANON-AQTS-3B54-Q/5/H4</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/44/H4</b></p> <p>ANON-AQTS-32UF-S/1/H4</p> <p>ANON-AQTS-32UE-R/5/H4</p> <p><b>ANON-AQTS-32SB-K - Defence Infrastructure Organisation/8/H4</b></p> <p>ANON-AQTS-322T-4/6/H4</p> <p>ANON-AQTS-3BB1-1/1/H4</p> <p>BHLF-AQTS-32EE-8/3/H4</p> <p>BHLF-AQTS-32EY-V/7/H4</p> <p>BHLF-AQTS-328Q-7/15/H4</p> <p>BHLF-AQTS-3283-9/1/H4</p> <p>BHLF-AQTS-328P-6/4/H4</p> <p>BHLF-AQTS-328W-D/4/H4</p> <p>BHLF-AQTS-328X-E/18/H4</p> <p>BHLF-AQTS-328H-X/1/H4</p>		



BHLF-AQTS-32QE-M/8/H4  
BHLF-AQTS-32QY-8/12/H4

**Main issues raised in representations received in regulation 19 consultation**

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

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	C Cahill
<b>Personal reference number</b>	ANON-AQTS-3BCM-X
<b>Full reference number</b>	ANON-AQTS-3BCM-X/1/H4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H4 point B.  Infill Sites outside a development boundary but within a sustainable distance for walking to a settlement centre are being excluded.  There are infill sites which are highly sustainable, not isolated in the countryside, being excluded due to their being no infill policy outside a defined settlement boundary.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Inclusion of a policy for infill sites outside a defined settlement boundary.  These infill sites meet all the criteria for an infill site where there is no development boundary. But are currently rejected, as they being treated as in the countryside due to the lack of infill policy for suitable sites outside a development boundary.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Policy H4  D. Outside the settlements shown in point A. Infill sites which meet the following will be allowed:</p> <ol style="list-style-type: none"> <li>1. Consists of infilling of a small site</li> <li>2. Is located within an existing dwellings</li> <li>3. Is within a continuously developed road frontage</li> <li>4. Would be compatible with the layout, built form and character of the surrounding dwellings</li> <li>5. Located within a 20 minute neighbourhood of settlement centre</li> <li>6. Would not involve the loss of important gaps between developed areas</li> </ol>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	No

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/61/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The housing requirement for the Winchester Town is set out in the table within the policy H3. Paragraph 9.27 identifies Sir John Moore Barracks (SJMB) as one of the key sites allocated to meet that requirement which is described as a previously developed site. The Parish Council is concerned that as written the Plan gives the impression that all of the site is previously developed land which is not the case. It objects to the wording of the supporting text.</p> <p>Object to paragraph 9.27 and the reference to the Sir John Moore Barracks (SJMB) site being previously developed land.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend paragraph 9.27 delete the reference to the Sir John Moore Barracks.
<b>What is your suggested wording or text for the policy?</b>	Amend paragraph 9.27 delete the reference to the Sir John Moore Barracks.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies)</a></p>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Christine Gardner
<b>Personal reference number</b>	ANON-AQTS-3BJD-V
<b>Full reference number</b>	ANON-AQTS-3BJD-V/7/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I object to building 150 dwellings at the end of Courtenay Road, Winchester. (SHELAA HW09). This area has suffered enough, with Barton Farm. The area suggested is meant to be open land between the settlements of Winchester and Headbourne Worthy/Kings Worthy. It must not have the extra traffic which would come if a road link to Barton Farm was allowed. This would become a rat run. Extra homes would spoil the environment of Courtenay Road.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Do not build extra homes at the end of Courtenay Road.
<b>What is your suggested wording or text for the policy?</b>	Extra homes at the end of Courtenay Road, Winchester, should not be built. This part of North Winchester has been spoiled enough. The hundreds of homes on Barton Farm should be sufficient, & there should be no traffic link to Courtenay Road from Barton Farm, which would come if extra homes were built there.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/81/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B54-Q
<b>Full reference number</b>	ANON-AQTS-3B54-Q/5/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Blenheim Strategic Partners support the principle of draft Policy H4 for development within specific settlements, including Bishop's Waltham. The draft allocation at Land north of Rareridge Lane will contribute towards development within the Market Town and towards the borough's housing targets.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/44/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council supports this policy
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Caroline Jezeph
<b>Personal reference number</b>	ANON-AQTS-32UF-S
<b>Full reference number</b>	ANON-AQTS-32UF-S/1/H4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H4 Development within Settlements</p> <p>The principles behind this policy were established many years ago and are now perpetuated in emerging Policy H4. In the currently adopted Local Plan it is Policy MTRA3 which provides for infilling. In the Regulation 19 Plan the policy has been partly reworded and is now Policy H4.</p> <p>Policy H4A provides for development only within the defined boundaries of settlements which are listed and shown on the Policies Map. Although this appears logical on first reading it is in fact unduly restrictive. It assumes that there are no sites outside a settlement boundary which could be considered for infilling development.</p> <p>In defining settlement boundaries choices must be made regarding the alignment of the boundary. This requires decisions to be made as to whether a particular piece of land 'in' or 'out' of the settlement boundary. Once the decision is made the boundary is fixed. Under Policy H4A there is no provision for development, such as infilling, to be located outside of the defined boundary.</p> <p>Thus, Policy H4A provides no opportunity for planning judgement to be exercised. For example, a site may be outside of the settlement boundary, but surrounded by existing dwellings and in close proximity to a new housing allocation. It may also be highly sustainable, close to the commercial centre of a 'Larger Rural Settlement' with bus routes passing by. Under Policy H4 here is no provision for the development of the site. An example that demonstrates this is Broad View Cottage, Kidmore Lane, Denmead PO7 6JU, which is at appeal. The proposed conversion of an annexe to a separate dwelling house is refused on policy grounds that it lies outside the settlement boundary. Yet it is highly sustainable. The property lies just 300m from the shops, services and buses serving Denmead.</p> <p>The illogicality of H4 is even more evident when reading H4B</p> <p>This part of the policy also perpetuates the provisions of MTRA3 in that it provides for infilling in settlements where there is no defined boundary.</p> <p>Why are there no defined boundaries to some settlements? This is usually because the settlement is small and perhaps dispersed. It is also usually the case that the settlement is of a lower order having fewer services available. Indeed, such settlements are more remote and less sustainable.</p>

	<p>How then is an assessment made as to whether the site is 'in' the settlement which has no boundary? Arguably the site could be in the 'countryside' or it may be in the 'undefined settlement'. The decision relies on the planning judgement of the decision maker. One decision maker may consider the site to be 'countryside' whilst another may decide it is within the 'undefined settlement'.</p> <p>Thus, proposals for sites in more remote less sustainable settlements rely on the planning judgement of the decision maker. On the other hand, there is no such opportunity to make a planning judgement with regard to more sustainable sites adjacent to the urban area. This is nonsense.</p> <p>Sustainability is a key driver. The National Planning Policy Framework addresses this in section 2 Achieving sustainable development. It states at paragraph 11:</p> <p>11. Plans and decisions should apply a presumption in favour of sustainable development.</p> <p>For plan-making this means that:</p> <p>a) all plans should promote a sustainable pattern of development</p> <p>Conclusion</p> <p>Policy H4 relies on the decision makers judgement for assessment of settlements without a boundary, but it provides for no planning judgement to be made in respect of more sustainable sites excluded by a boundary. This policy fails to promote a sustainable approach. It should be reworded so that there is some flexibility to allow for infilling in sustainable locations.</p> <p>Fareham Borough Council's recently adopted Local Plan 2037 contains a sensitive and sustainable infilling policy at Policy HP2 New Small-Scale Residential Development Outside the Urban Areas. There is much to commend the criteria based approach and wording of this policy. The decision to permit infilling outside a settlement boundary is based on a number of criteria relating to sustainability, character of the area, design etc.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy H4 relies on the decision makers judgement for assessment of settlements without a boundary, but it provides for no planning judgement to be made in respect of more sustainable sites excluded by a boundary. This policy fails to promote a sustainable approach. It should be reworded so that there is some flexibility to allow for infilling in sustainable locations.</p> <p>Fareham Borough Council's recently adopted Local Plan 2037 contains a sensitive and sustainable infilling policy at Policy HP2 New Small-Scale Residential Development Outside the Urban Areas. There is much to commend the criteria based approach and wording of this policy. The decision to permit infilling outside a settlement boundary is based on a number of criteria relating to sustainability, character of the area, design etc.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy H4 relies on the decision makers judgement for assessment of settlements without a boundary, but it provides for no planning judgement to be made in respect of more sustainable sites excluded by a boundary. This policy fails to promote a sustainable approach. It should be reworded so that there is some flexibility to allow for infilling in sustainable locations.</p>

	Fareham Borough Council's recently adopted Local Plan 2037 contains a sensitive and sustainable infilling policy at Policy HP2 New Small-Scale Residential Development Outside the Urban Areas. There is much to commend the criteria based approach and wording of this policy. The decision to permit infilling outside a settlement boundary is based on a number of criteria relating to sustainability, character of the area, design etc.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Vistry Group (land at Fairthorne Grange Farm and Brindle Farm, Curbridge, Whiteley)
<b>Personal reference number</b>	ANON-AQTS-32UE-R
<b>Full reference number</b>	ANON-AQTS-32UE-R/5/H4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Comment on paragraph 9.26.</p> <p>As evidenced by the council's Strategic Housing and Economic Land Availability Assessment 2023 there is scope for expansion of North Whiteley.</p> <p>Vistry Group has promoted its land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road through earlier stages of plan making, including the preparation and submission of a Vision document which outlines the opportunity on this 23.8ha site adjoining North Whiteley. The site is referenced as CU32 in the Strategic Housing and Economic Land Availability Assessment 2023 as 'deliverable/developable' with an indicative capacity of 356 homes and the Vision document for Vistry presents a concept with the potential to deliver around 430 homes. The site is part of a wider area at North Whiteley that has seen recent infrastructure investment, and will see further investment, and the opportunities associated with this should be optimised. It is urged that this site CU32 be allocated now as part of a strategy that can deliver and maintain an upward housing trajectory and better address need arising in South Hampshire as part of the duty to co-operate.</p> <p>Vistry Group wishes to participate on this matter at the local plan examination.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend paragraph 9.23 to identify that there is further scope to expand the North Whiteley strategic site, notably through the allocation of Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road (site reference CU32 in the Strategic Housing and Economic Land Availability Assessment 2023).
<b>What is your suggested wording or text for the policy?</b>	Amend paragraph 9.23 to identify that there is further scope to expand the North Whiteley strategic site, notably through the allocation of Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road (site reference CU32 in the Strategic Housing and Economic Land Availability Assessment 2023).
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Defence Infrastructure Organisation
<b>Personal reference number</b>	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
<b>Full reference number</b>	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/8/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	1.46 Policy H4 addresses policy matters promoting new development within settlements/settlement boundaries as defined in the Reg 19 policy map. In similar circumstances to our requested changes to Policy NE14 above, the SJMB allocation should be included within a settlement boundary, and included as a settlement listed in Policy H4, we consider that Policy H4 should be amended to ensure that there is no conflict with Policy W2. In our view, achieving the requirements of Policy H4 would be challenging whilst delivering a large-scale residential masterplan for the site, in accordance with Policy W2.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Our requested changes are as follows to Policy H4, 1st paragraph, and settlement group labelled A (p.223): “Development that accords with the Development Plan will be permitted in the following groups of settlements or in Site Allocation areas: “A. Within the defined boundaries of the following settlements, as shown on the Policies Map: Bishop’s Waltham, Colden Common, Compton Down, Denmead, Hursley, Kings Worthy, Knowle, Littleton, Micheldever, Micheldever Station, New Alresford, Old Alresford, Otterbourne, Sir John Moore Barracks, South Wonston, Southdown, Southwick, Sparsholt, Sutton Scotney, Swanmore, Waltham Chase, Whiteley, Wickham, Winchester Town.”
<b>What is your suggested wording or text for the policy?</b>	Our requested changes are as follows to Policy H4, 1st paragraph, and settlement group labelled A (p.223): “Development that accords with the Development Plan will be permitted in the following groups of settlements or in Site Allocation areas: “A. Within the defined boundaries of the following settlements, as shown on the Policies Map: Bishop’s Waltham, Colden Common, Compton Down, Denmead, Hursley, Kings Worthy, Knowle, Littleton, Micheldever, Micheldever Station, New Alresford, Old Alresford, Otterbourne, Sir John Moore Barracks, South Wonston, Southdown, Southwick, Sparsholt, Sutton Scotney, Swanmore, Waltham Chase, Whiteley, Wickham, Winchester Town.”
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	



<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/6/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H4a</p> <p>Policy H4a sets out those settlements with settlement boundaries, and reiterates the approach to settlement boundaries set out in Policy SP3.</p> <p>We have set out our concerns regarding the use of settlement boundaries in the draft Local Plan in our comments on Policy SP3. We note that Littleton is named in Policy H4a as a settlement with a settlement boundary – which further emphasises the need for clarity in the Local Plan around the status of Littleton in respect of the strategic allocation at Sir John Moore Barracks.</p> <p>We would reiterate our comments regarding Policy SP3, and suggest that Policy H4a could usefully set out that in terms of settlements with settlement boundaries, development that accords with the other policies of the Local Plan will be permitted within settlement boundaries, or on infill and rounding off sites which directly adjoin settlement boundaries.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We would reiterate our comments regarding Policy SP3, and suggest that Policy H4a could usefully set out that in terms of settlements with settlement boundaries, development that accords with the other policies of the Local Plan will be permitted within settlement boundaries, or on infill and rounding off sites which directly adjoin settlement boundaries.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	No

*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Charles William Bone
<b>Personal reference number</b>	ANON-AQTS-3BB1-1
<b>Full reference number</b>	ANON-AQTS-3BB1-1/1/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I did not wish to comment on this but the system has defeated me
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Footstep Active Living Ltd
<b>Personal reference number</b>	BHLF-AQTS-32EE-8
<b>Full reference number</b>	BHLF-AQTS-32EE-8/3/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	We object to the wording of the policy (A) as drafted which only supports development “within the defined boundaries of the following settlements...” on the basis that the settlements listed are the most sustainable rural settlements and development opportunities exist on suitable and accessible sites beyond, but adjoining, some settlement boundaries, including Southdown.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy text needs to be amended to be more flexible, and/or settlement boundaries need to be reviewed to include suitable and accessible sites.
<b>What is your suggested wording or text for the policy?</b>	If settlement boundaries are not reviewed, or further housing allocations made, draft policy H4 should be amended to add “...within or adjoining the defined boundaries of the following settlements...” in order to help boost the supply of housing in sustainable locations.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Supporting document 1 (Location Plan)</a> <a href="#">Supporting document 2 (form commenting on H3)</a> <a href="#">Supporting document 3 (Form commenting on D6)</a> <a href="#">Supporting document 4 (Form commenting on H4)</a> <a href="#">Supporting document 5 (Form commenting on NE7)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	George Whalley
<b>Personal reference number</b>	BHLF-AQTS-32EY-V
<b>Full reference number</b>	BHLF-AQTS-32EY-V/7/H4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Policy H4 – Development within Settlements</p> <p>2.72 We object to Policy H4 which is not justified as the proposed settlement boundary for Bishops Waltham does not include Land at Mill Chase which is a sustainable site for allocation in the local plan and inclusion within the settlement boundary. Our response to Policy H3 sets out the full justification for allocating the site in the local plan and inclusion within the Bishops Waltham settlement boundary.</p> <p>2.73 In summary, Land at Mill Chase provides the opportunity to deliver c50 dwellings in the Market Town of Bishops Waltham. The site is of modest scale and is deliverable in terms of suitability, availability and 'achievability'.</p> <p>2.74 The site is accessibility to local services / facilities and public transport providing connections to Winchester and the rest of Hampshire. The site relates positively to the settlement edge and is relatively unconstrained in relation to landscape, settlement gap, heritage, ecology and BNG, flood risk and transport impacts.</p> <p>2.75 The site can be delivered within 5 years and will make a significant contribution to the local plan housing requirement and provide a greater contribution towards definitive unmet housing need in the area which is currently not provided for.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Supporting information (commenting on policies and proposed site)</a>



<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/15/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H4 highlights defined settlements boundaries and how they are a key tool to indicate where built development is.</p> <p>Gladman acknowledge the interactive policy map shows in the Regulation 19 the settlement boundary to have been extended around Otterbourne to include the new site allocation OT01- east of Main Road.</p> <p>Additionally, within the Regulation 19 plan the settlement boundaries shown on page 478 on the map of Otterbourne includes the new site allocation OT01 to be within the proposed settlement boundary.</p> <p>Gladman support the above policy as a result with the allocation of new housing now included within the settlement boundary and therefore consistent across policies in the wider plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Supporting information (commenting on policies and proposed site)</a></p>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Ms. Stevenson
<b>Personal reference number</b>	BHLF-AQTS-3283-9
<b>Full reference number</b>	BHLF-AQTS-3283-9/1/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Policy H4 Part B. in the proposed submission Local Plan (Regulation 19) confirms that development in villages with no defined settlement boundary - such as Durley - will be limited to infilling of small sites within a continuous developed road frontage, where this would be compatible with the layout, built form and character of the village and would not involve the loss of important gaps between developed areas.</p> <p>The December 2023 National Planning Policy Framework ('the Framework'), at paragraph 83, confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Furthermore, the Framework sets out the Government's objective of 'significantly boosting the supply of homes' (paragraph 60).</p> <p>Policy H4 Part B. as currently worded is likely to provide only very limited opportunities for development in these villages, severely restricting any housing growth.</p> <p>For example, by restricting growth to 'infilling on small sites within a continuously developed frontage', it does not consider the dispersed character of many settlements in the rural area. The Council assess our client's land (Ref: DU01) in the SHELAA (2023) as 'deliverable/developable' for a small-scale residential development and acknowledges that it is surrounded by existing residential and industrial development – albeit, this site would not come forward via Policy H4 as it would not meet the rigid policy requirements. Indeed, it is considered that almost all the sites promoted at Durley in the SHELAA would not meet the requirements of Policy H4. The lack of housing growth will not help to preserve and enhance services/facilities and will ensure that places such as Durley fall into a 'sustainability trap' and become dormant communities.</p> <p>This approach is flawed and will have serious implications for these rural communities, contrary to the aims of national policy. It does not support the vitality of these rural communities since it fails to identify opportunities for these villages to grow and thrive.</p> <p>With the above in mind, it is considered that Policy H4 Part B. should be more flexibly worded to encourage sites to come forward for new homes that are closely related to the existing settlement/built-up areas; situated within a reasonable distance to the available services and facilities (taking into account that in a rural area in</p>

	<p>accordance with paragraph 109 of the Framework); and are appropriate in scale and character/appearance of the area.</p> <p>It is considered that this would ensure that the Local Plan supports these rural communities in accordance with national policy. Furthermore, additional windfall development will help the Council boost the supply of housing across the district, particularly pertinent while an early review of the Local Plan is prepared to address the expected significant increase in Local Housing Need from the Government's proposed standard method.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<p><b>Have you submitted supporting information?</b></p> <p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Form (H4)</a></p>

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Messrs Jenssen & Collins
<b>Personal reference number</b>	BHLF-AQTS-328P-6
<b>Full reference number</b>	BHLF-AQTS-328P-6/4/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	We object to the wording of the policy (A) as drafted which only supports development “within the defined boundaries of the following settlements...” on the basis that these are the most sustainable rural settlements and development opportunities exist on suitable and accessible sites beyond, but adjoining, some settlement boundaries.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy text needs to be amended to be more flexible, and/or settlement boundaries need to be reviewed to include suitable and accessible sites.
<b>What is your suggested wording or text for the policy?</b>	If settlement boundaries are not reviewed, or further housing allocations made, draft policy H4 should be amended to add “...within or adjoining the defined boundaries of the following settlements...” in order to help boost the supply of housing in sustainable locations.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form 1 (OT01 and H2)</a> <a href="#">Form 2 (H4)</a> <a href="#">Form 3 (Settlement Boundary review - Otterbourne)</a> <a href="#">Form 4 (SP2)</a>

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Macra Ltd
<b>Personal reference number</b>	BHLF-AQTS-328W-D
<b>Full reference number</b>	BHLF-AQTS-328W-D/4/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Whilst we consider that the overarching direction and function of the policy is appropriate, we consider that the Policies Map relating to Wickham settlement should be appropriately updated to reflect the inclusion of the urban area of proposed strategic allocation, Land at Mayles Farm, Wickham, within the settlement boundary. We have enclosed a proposed plan titled ‘Wickham Modified Settlement Boundary’ (Appended at ABs1) for the ease of reference. The proposed boundary excludes that land which it is suggested will comprise part of the connected framework of open greenspace at the southern end of Wickham settlement and which will form a cohesive country park style designation with the Welborne Garden Village SANG. The proposed revised settlement boundary will ensure that the ‘settlement gap’ between Wickham, Knowle and Welborne Garden Village is maintained as open in perpetuity.</p> <p>As we discuss in response to Policy NE7 – Settlement Gaps, it is not considered that the allocation of Land at Mayles Farm, Wickham will prejudice the role or function of the proposed settlement gap. The allocation of the land will instead, as a matter of fact, enable public access to a significant area of additional open greenspace, which can be transferred into public ownership and provide certainty that this land will remain open in perpetuity. The proposed approach to the land provides certainty of the openness of the gap, and will in no manner undermine or prejudice its function or lead to the coalescence of the settlements. Alongside this, the proposed approach will ensure that there is no need to modify the settlement gap in the future, which has clearly occurred within successive development plans whereby Winchester Council have latterly released land from the settlement gaps for development.</p> <p>The proposed development will round off the existing settlement boundary and indeed maintain the function of a significant belt of land which will run between the settlement and the development at Welborne Garden Village and Knowle village to the south. The difference with the allocation of Land at Mayles Farm, Wickham, is that the land within the settlement gap will be formally designated as open space, made available and</p>

	<p>accessible to the public and transferred into public ownership to ensure that it can be kept permanently open. There is clear and demonstrable benefit in such an approach.</p> <p>In line with the other representations made in respect of the PSLP, we ask therefore that the Inspector consider formally the introduction of Land at Mayles Farm, Wickham as an omissions site either in replacement of strategic sites: Site WI02 – Land at Mill Lane, Wickham; and, Site WI03 – Land at Southwick Road/School Road, which we do not consider to be appropriately justified, or in supplement to these. As we have evidenced, there is no justification provided at this stage for how the 50 dwelling windfall allowance at Wickham will be met within the plan period, without an expansion of the settlement boundary as there is a fundamental lack of opportunities within the settlement boundary to deliver infill development and there are no deliverable brownfield sites, as the Winchester Council brownfield land register confirms. There is no likelihood that this house need will be met without a further modification to the settlement boundary and indeed that should occur at the strategic plan making stage with the formal allocation of Land at Mayles Farm, Wickham to meet this need.</p> <p>see PDF for further detail</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Form (listing policies and submitted document)</a>  <a href="#">Letter (commenting on Policies and Evidence base)</a>  <a href="#">Supporting documents (Landscape Appraisal and Maps)</a></p>



*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/18/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Wates' opinion is that settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is carefully considered in the Council's final drafting exercises before the Local Plan is published to ensure that they are still generally fit for purpose. Wates submits that the Councils will need to reflect on the operation of settlement boundaries and how they comply with the Planning Practice Guidance as follows:</p> <p>"The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness."</p> <p>Paragraph: 009 Reference ID: 67-009-20190722</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a>

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Whiteley Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328H-X
<b>Full reference number</b>	BHLF-AQTS-328H-X/1/H4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response.</b></p> <p>Full response on website including attachments</p> <p>The Local Plan has not given sufficient consideration to the provision of small sites for development. The policies are too restrictive and place severe restraints on the provision of small sites and this is contrary to the Government’s explicit and mandated requirements. The Local Plan policies provide for infilling in some settlements under Policy H4 but the Settlement Gaps Policy (NE7) adds an additional hurdle for infilling.</p> <p>This Policy allows the possibility of infilling in settlements where there are no defined settlement boundaries. Sites that are in Settlement Gaps must satisfy many more issues. These settlements include sites in the Meon Gap, Kingsworthy Gap and the Swanmore- Bishops Waltham and other Gaps. It can be appreciated that this Policy provides a “light touch’ to the development of infilling in settlements where there are no defined settlement boundaries. The criteria are established in Section B. It can be seen that there are fewer hurdles for infilling in settlements where there are no defined settlement boundaries. Elsewhere, countryside policies will apply and only development appropriate to a countryside location will be permitted, as specified in Policy SP3.</p> <p>Policy H4B hasn’t provided any clarity on what constitutes an infilling gap. The criteria are vague. It states that the proposal consists of infilling of a small site ... within a continuously developed road frontage. The previous Policy MTRA3 was criticised for this weakness but the wording has been carried forward essentially unchanged. Small sites have been proposed for development only to find that the Council has hidden criteria that are not based upon the policy. Planning applications and appeals have revealed that the infilling gaps should only be wide enough to provide space for two dwellings. This incongruity remains because the revised Policy hasn’t provided any additional criteria leaving developers still uncertain as to what will be supported.</p>

	<p>There are many sites in the District that could meet the new government's guidance if the infilling policy was made more flexible. The development of small sites is beneficial for the local economy. It provides jobs for local people and there is the possibility of training people in the skills in the building trades that are desperately needed. The Council is in effect opposed to this. This is not justified.</p> <p>In conclusion, the policies of the Local Plan Regulation 19 remain unjustifiably restrictive. The criteria set out for infilling needs to be modified to meet the government's guidance in the emerging NPPF. This places considerable emphasis on the provision of sites for small developers. It recognises the benefits this brings to the local economy. Policy H4 should be modified to allow the release of more small sites. The provision of small sites is severely restricted by the Gap Policies which in effect prevent development. The policies of the emerging Local Plan have the effect of restricting development in the most sustainable locations and favouring the least sustainable areas.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Revisions to Policy H4 and other linked policies to facilitate release of land for development of small sites. Removal of the very restrictive policy regime.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (NE7 - refers to letter)</a>  <a href="#">Form (small sites)</a>  <a href="#">Letter 1 (Comments on NE7)</a>  <a href="#">Letter 2 (Comments on H3 and H4)</a>  <a href="#">Letter 3 (re Land adjoining Lodge Green, Whiteley Lane)</a>  <a href="#">Supporting Document 1 (Landscape appraisal - Figures)</a>  <a href="#">Supporting Document 2 (Landscape and visual impact appraisal)</a></p>

<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Ibex Homes Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QE-M
<b>Full reference number</b>	BHLF-AQTS-32QE-M/8/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Policy H4- Development within Settlement Boundaries</p> <p>OBJECT</p> <p>2.20 Ibex cannot agree with this policy wording. Bishops Waltham is expected to deliver 99 dwellings through windfall permissions during the plan period. The Bishops Waltham settlement boundary has been extended to include the allocations within the Town, but these are drawn tightly around these allocations and existing development leaving no additional land within the settlement boundary for new housing. It is quite clear that there is very limited capacity within the confines of the existing settlement boundary, given that the allocations site on the outer edges and therefore it is not clear where the windfall dwellings are able to be located. There is no capacity study for Bishops Waltham to demonstrate how these dwellings could be located.</p> <p>2.21 This policy should be supported by evidence that demonstrates Bishops Waltham is able to provide its windfall development. If the Council is unable to demonstrate that there is sufficient capacity, the settlement boundary should be extended to accommodate further allocations/ residential growth.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on letter and proposed site)</a> <a href="#">Supporting information (Location Plan)</a></p>
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<b>Policy/Evidence base document</b>	H4
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/12/H4
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Harding Holdings cannot agree with this policy wording. Bishops Waltham is expected to deliver 99 dwellings through windfall permissions during the plan period. The Bishops Waltham settlement boundary has been extended to include the allocations within the Town, but these are drawn tightly around these allocations and existing development leaving no additional land within the settlement boundary for new housing. It is quite clear that there is very limited capacity within the confines of the existing settlement boundary, given that the allocations site on the outer edges and therefore it is not clear where the windfall dwellings are able to be located. There is no capacity study for Bishops Waltham to demonstrate how these dwellings could be located.</p> <p>4.60 This policy should be supported by evidence that demonstrates Bishops Waltham is able to provide its windfall development. If the Council is unable to demonstrate that there is sufficient capacity, the settlement boundary should be extended to accommodate further allocations/ residential growth.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Form (refers to letter)</a>



<p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p><a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Supporting information (Map)</a></p>
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<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.

Local Plan Reference or document	Policy H5 Meeting Housing Needs	
<b>Total Number of Representations received</b>	21	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	14	5
<b>Sound</b>	8	13
<b>Complies with Duty to Cooperate</b>	16	3
<p><b>Summary of Representations</b></p> <p>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.</p> <p>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.</p> <p>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.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BCM-X/2/H5  ANON-AQTS-3BSY-T/92/H5  ANON-AQTS-3291-8/9/H5  ANON-AQTS-3B5A-4/8/H5  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/48/H5</b>  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</p>		

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

**Main issues raised in representations received in regulation 19 consultation**

- 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.

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	C Cahill
<b>Personal reference number</b>	ANON-AQTS-3BCM-X
<b>Full reference number</b>	ANON-AQTS-3BCM-X/2/H5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy H5 paragraph:Self build and custom build housing The above paragraph only detail sites over 50 dwellings. Self builders often want to build on small sites. These are often in sustainable locations and can be located outside a defined settlement boundary.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The wording only provides for self / custom build on sites over 50 dwellings. The inclusion of small infill sites entirely dedicated to self build and custom build homes. Inclusion of Exception infill sites outside a settlement boundary meeting specific criteria for self build only using sustainable sites
<b>What is your suggested wording or text for the policy?</b>	Policy H5 Paragraph self build and custom build housing Addition of To support self and custom build on sites of less than 5 dwellings on sites outside a defined settlement boundary. 1. Site must be within / adjacent to existing built form 2. Site must be within a 20 minute neighbourhood area 3. Entire site must be for self build dwellings 4. Site must be available to meet local requirements for self build and custom building.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/92/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/9/H5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>No evidence has been published which demonstrates a need for 6% Self and Custom Build (SCB) housing on sites of over 50 dwellings. The Feb 2020 SHMA notes ‘in recognition of the level of demand in the District, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It is considered that schemes could come forwards on both small and larger sites in the District; and the policy should be flexible to provide for opportunities as and when they arise on suitable sites.’ The 2024 SHMA update provides no additional information on this matter.</p> <p>It must be recognised that not all allocations and settlements would be suitable for SCB, or the 6% target which may threaten the delivery of housing required to address HMA and local needs. FH ask whether the 6% is a total of all new homes, or exclusive of affordable homes, i.e. just the open market housing component?</p> <p>FH do not consider that the policy wording provides the flexibility as advised and no narrative has been provided to demonstrate the trigger point of sites of 50 dwellings, or proportion being required. The policy is not justified.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>No evidence has been published which demonstrates a need for 6% Self and Custom Build (SCB) housing on sites of over 50 dwellings. The Feb 2020 SHMA notes ‘in recognition of the level of demand in the District, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It is considered that schemes could come forwards on both small and larger sites in the District; and the policy should be flexible to provide for opportunities as and when they arise on suitable sites.’ The 2024 SHMA update provides no additional information on this matter.</p> <p>It must be recognised that not all allocations and settlements would be suitable for SCB, or the 6% target which may threaten the delivery of housing required to address HMA and local needs. FH ask whether the 6% is a total of all new homes, or exclusive of affordable homes, i.e. just the open market housing component?</p> <p>FH do not consider that the policy wording provides the flexibility as advised and no narrative has been provided to demonstrate the trigger point of sites of 50 dwellings, or proportion being required. The policy is not justified.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>No evidence has been published which demonstrates a need for 6% Self and Custom Build (SCB) housing on sites of over 50 dwellings. The Feb 2020 SHMA notes 'in recognition of the level of demand in the District, a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It is considered that schemes could come forwards on both small and larger sites in the District; and the policy should be flexible to provide for opportunities as and when they arise on suitable sites.' The 2024 SHMA update provides no additional information on this matter.</p> <p>It must be recognised that not all allocations and settlements would be suitable for SCB, or the 6% target which may threaten the delivery of housing required to address HMA and local needs. FH ask whether the 6% is a total of all new homes, or exclusive of affordable homes, i.e. just the open market housing component?</p> <p>FH do not consider that the policy wording provides the flexibility as advised and no narrative has been provided to demonstrate the trigger point of sites of 50 dwellings, or proportion being required. The policy is not justified.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a></p> <p><a href="#">Supporting document 2 (Location Plan)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Illustrative masterplan)</a></p> <p><a href="#">Supporting document 5 (Access and Transport Report)</a></p> <p><a href="#">Supporting document 6 (Landscape and visual study)</a></p> <p><a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a></p> <p><a href="#">Supporting document 8 (Interim Ecology Assessment)</a></p> <p><a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a></p> <p><a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a></p> <p><a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a></p> <p><a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a></p>



<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/8/H5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>BSP recognise and support the provision of self-build and custom build homes within Winchester and their role in aiding the council to meet its housing need requirements through the new local plan period. However, in preparing a sound and flexible local plan, this needs to be reflected in policy wording, particularly in relation to affordable housing.</p> <p>Any plots delivered for self-build homes should not be subject to requirements for affordable housing. The Policy meets a specific demand and legal requirement and should be separated from the overall number of dwellings which would be subject to the percentage affordable target.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The policy should be expanded to acknowledge that the percentage of self-build homes should not account towards the overall affordable housing requirement.
<b>What is your suggested wording or text for the policy?</b>	Additional wording/supporting paragraph: The provision of self-build or custom build homes on a development site is not expected to contribute towards the overall number of dwellings which would be subject to the percentage affordable target.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/48/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	x
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/13/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>This comment has been summarised – see supporting information for full response</p> <p>Proposed Policy H5 will need to be revised to improve its effectiveness and practical implementation as a development management tool.</p> <p>Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and the local area. A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent should be 3-bedroom or larger. Whilst this may be achievable on some sites, Vistry Partnerships are concerned that applying a ‘blanket requirement’ will not be effective in practice.</p> <p>Similarly, at limb ‘ii’, the policy envisages that “At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses”. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement.</p> <p>Furthermore, at limb ‘iii’ the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations,. For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage, landscape and rural character, as well as the NPPF Section 12 ‘Achieving Well-Designed Places’.</p> <p>As a separate requirement, Policy H5 proposes that developments of 50 dwellings or larger should be required to provide 6% of those dwellings as self-build plots. Vistry Partnerships do not agree that all larger developments should be required to provide a proportion of new homes as self-build plots. Based on experience elsewhere, the inclusion of self-build plots within larger developments can create significant problems during the construction stage, and uptake uptake of self-build plots tends to be limited in-practice. As such, Vistry Partnerships recommend that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.</p> <p>Concerning ‘specialist and supported housing’, Vistry Partnerships agrees the plan should make provision for specialist accommodation for older persons. Indeed, the SHMA 2024 identifies a requirement for such accommodation, with Table 5.7 (page 80) identifying a need for 1,004 market ‘housing with support’ units (i.e.</p>

	<p>retirement living) over the period 2020 – 2040, in addition to 540 ‘housing with care’ units (both market and affordable), as would be met through extra care housing formats. Table 5.7 also identifies a need for a further 547 care home/nursing home beds by 2040.</p> <p>However, rather than requiring all residential schemes of 50 or more dwellings to provide such specialist accommodation (an approach unlikely to be effective in practice), the new Local Plan should instead allocate specific additional sites for such. This will provide more certainty that the identified need for specialist accommodation will be addressed. This is indeed the approach recommended in paragraph 6.40 of the SHMA 2020;</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Overall, Vistry Partnerships consider that Policy H5 (as presently drafted), is not consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft policy therefore requires substantial revision in order to render it more flexible and practical. In conclusion, the policy should be reworded to:</p> <ul style="list-style-type: none"> <li>• Remove the blanket requirement for 30% of all affordable dwellings for rent to be 3-bedroom or larger and replace with more flexibility incorporated on a site-by-site basis and/or to be based upon most up to date evidence on housing need;</li> <li>• Remove the blanket requirement for 65% of affordable homes to be 2 or 3 bedroomed houses and replace with more flexibility incorporated on a site-by-site basis and/or to be based upon most up to date evidence on housing need;</li> <li>• Remove the blanket requirement for at least 30% of market housing to be provided as 1 and 2-bedroom dwellings and replace with more flexibility incorporated on a site-by site basis and/or to be based upon most up to date evidence on housing need; and</li> <li>• Introduce the need for self-build plots on a site-by-site basis depending on factors such as viability.</li> </ul>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Overall, Vistry Partnerships consider that Policy H5 (as presently drafted), is not consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft policy therefore requires substantial revision in order to render it more flexible and practical. In conclusion, the policy should be reworded to:</p> <ul style="list-style-type: none"> <li>• Remove the blanket requirement for 30% of all affordable dwellings for rent to be 3-bedroom or larger and replace with more flexibility incorporated on a site-by-site basis and/or to be based upon most up to date evidence on housing need;</li> <li>• Remove the blanket requirement for 65% of affordable homes to be 2 or 3 bedroomed houses and replace with more flexibility incorporated on a site-by-site basis and/or to be based upon most up to date evidence on housing need;</li> <li>• Remove the blanket requirement for at least 30% of market housing to be provided as 1 and 2-bedroom dwellings and replace with more flexibility incorporated on a site-by site basis and/or to be based upon most up to date evidence on housing need; and</li> <li>• Introduce the need for self-build plots on a site-by-site basis depending on factors such as viability.</li> </ul>

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base - includes tables)</a> <a href="#">Supporting document 1 (Affordable Housing Statement)</a> <a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a> <a href="#">Supporting document 3 (Vision Document 2)</a> <a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a> <a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a>

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/11/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>This comment has been summarised – see supporting information for full response</p> <p>Policy H5 should be revised to improve its effectiveness and practical implementation as a development management tool.</p> <p>Firstly, the policy should be clearer that the mix of housing provided through development should consider not only the latest evidence of need but also the characteristics of the site and the local area.</p> <p>A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent should be 3-bedroom or larger. Whilst this may be achievable on some sites, Catesby is concerned that applying a ‘blanket requirement’ will not be effective in practice, as the appropriate dwelling mix will (as previously stated) depend on localised / site-specific considerations and the Plan-wide evidence of need. Similarly, at limb ‘ii’, the policy envisages that “At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses”. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.</p> <p>Furthermore, at limb ‘iii’ the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities. For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage, landscape and rural character, as well as the NPPF Section 12 ‘Achieving Well-Designed Places’.</p> <p>As a separate requirement, Policy H5 proposes that developments of 50 dwellings or larger should be required to provide 6% of those dwellings as self-build plots. Catesby does not agree that all larger developments should be required to provide a proportion of new homes as self-build plots. Based on experience elsewhere, including self-build plots within larger developments can create significant problems during the construction stage and uptake of self-build plots, therefore, tends to be limited in practice. As such, Catesby recommends that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where the landowner has promoted them for this purpose.</p>

	<p>Concerning ‘specialist and supported housing’, Catesby agrees that the plan should make provision for specialist accommodation for older persons. Indeed, the SHMA 2024 identifies a requirement for such accommodation, with Table 5.7 (page 80) identifying a need for 1,004 market ‘housing with support’ units (i.e., retirement living) over the period 2020 – 2040, in addition to 540 ‘housing with care’ units (both market and affordable), as would be met through extra care housing formats. Table 5.7 also identifies a need for a further 547 care home/nursing home beds by 2040.</p> <p>However, rather than requiring all residential schemes of 50 or more dwellings to provide such specialist accommodation (an approach unlikely to be effective in practice), the new Local Plan should instead allocate specific additional sites for such. This will provide more certainty that the identified need for specialist accommodation will be addressed. This is indeed the approach recommended in paragraph 6.40 of the SHMA 2020;</p> <p>Land South of Titchfield Lane, Wickham, is suitable for such a development and is promoted flexibly for either care / extra care accommodation, conventional residential development, or a combination of both. Catesby is in receipt of market advice, which confirms that operators are strongly demanding a care home / extra care development at this site. This provides a clear indication of deliverability.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Overall, Catesby considers that Policy H5 (as presently drafted) is not justified or consistent with national planning policies, nor will it be effective at the development management stage. The policy should be reworded to:</p> <ul style="list-style-type: none"> <li>• Lift the requirement for 30% of all affordable dwellings for rent to be 3-bedroom or larger;</li> <li>• Remove the requirement for 65% of all affordable homes to be 2 or 3-bed houses and replace;</li> <li>• Remove the requirement for at least 30% of market housing to be provided as 1 and 2-bedroom dwellings;</li> <li>• Identify and allocate sites promoted for self-build developments and remove the requirement for conventional development sites to provide self-build plots; and,</li> <li>• Identify and allocate sites specifically promoted to include specialist accommodation for older persons.</li> </ul>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Overall, Catesby considers that Policy H5 (as presently drafted) is not justified or consistent with national planning policies, nor will it be effective at the development management stage. The policy should be reworded to:</p> <ul style="list-style-type: none"> <li>• Lift the requirement for 30% of all affordable dwellings for rent to be 3-bedroom or larger;</li> <li>• Remove the requirement for 65% of all affordable homes to be 2 or 3-bed houses and replace;</li> <li>• Remove the requirement for at least 30% of market housing to be provided as 1 and 2-bedroom dwellings;</li> <li>• Identify and allocate sites promoted for self-build developments and remove the requirement for conventional development sites to provide self-build plots; and,</li> <li>• Identify and allocate sites specifically promoted to include specialist accommodation for older persons.</li> </ul>



<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a> <a href="#">Supporting document 2 (Vision Framework)</a> <a href="#">Supporting document 3 (Concept Plan)</a> <a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a>

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	West Waterlooville Developments Limited (Grainger PLC)
<b>Personal reference number</b>	ANON-AQTS-3B5G-A
<b>Full reference number</b>	ANON-AQTS-3B5G-A/6/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	<p>West Waterlooville Developments Limited (WWDL) recognises the importance of planning for future housing needs, yet requests some additional flexibility be introduced so that the policy wording does not hinder the delivery of extant outline consents.</p> <p>Current policy wording states 'unless compelling evidence is provided to the contrary, proposals should include for a reasonable mix of dwellings sizes' before setting out percentage requirements of the particular house sizes to be provided.</p> <p>The considerations of housing mix should be responsive to local market requirements, along with considerations to the scale and context of the site. Additional wording within the supporting text would be welcome to ensure that developers are able to respond to market requirements throughout the life of the plan.</p> <p>As with wording provided within policy CP2 of the current WCC Local Plan Part 1, the wording of the policy should introduce an allowance for a variation to the housing mix to be justified 'where local circumstances, or, other relevant planning considerations dictate' allowing the policy to be clear on what 'compelling evidence' may be comprised of and in order to recognise that variances in housing mix across the district will be required to ensure the viability and deliverability of housing.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#"><u>Supporting Document (Site Delivery Statement - Berewood)</u></a></p>
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<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/38/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Bloor Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. It is considered a range of housing types and tenures can be delivered as part of the Land at Mill Lane, Wickham site (Draft Policy WK5). However, there is the potential to expand the draft allocation to provide approximately 60 additional homes on land north of the proposed allocation. This would enable an increase in the range of housing types and tenures to be delivered on site, making most efficient use of land and increasing the affordable housing offer.</p> <p>In respect of dwelling size and tenure, Bloor consider the criteria set out to be overly specific, and lacking flexibility. The mix of units to be provided on any site should be based on the latest SHMA and reflect local characteristics. Consideration should also be given to the implications of these criteria for the efficient use of land, their appropriateness for each site and the market for the homes to be provided.</p> <p>As previously highlighted in our Regulation 18 representations concerning Strategic Policy H5, the proposed requirement for at least 6% self-build and custom build properties is introducing further technical challenges to an already complex planning system, which will ultimately hinder the delivery of much needed homes and facilities. The health and safety complications of delivering such properties should not be underestimated and there is limited evidence that self / custom build properties are working in practice. The reality is that the additional burden such properties place on developments is significant, placing additional management time / cost / resource on projects with potentially no customer interest or uptake at the end of the process. The existence of a register is not sufficient evidence to justify such a need exists as it is simply a list with no criteria-based requirement.</p> <p>The section on acceptable and adaptable homes should be retitled 'accessible and adaptable homes'. Bloor Homes consider that the policy needs to allow sufficient flexibility to factor in site circumstances for example topography etc. as this could affect levels, requiring retaining structures etc. As currently drafted it is insufficiently flexibly to reflect individual site circumstances. Furthermore, it is Bloor's experience that M4(3) properties are not of great interest to prospective purchasers and are more expensive to build.</p>

	<p>The requirement for schemes of 50 or more homes to include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units must be applied flexibly and be based on a needs analysis supported by appropriate evidence. Consideration should also be given to the impact of this requirement on the viability of a scheme.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Bloor Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. It is considered a range of housing types and tenures can be delivered as part of the Land at Mill Lane, Wickham site (Draft Policy WK5). However, there is the potential to expand the draft allocation to provide approximately 60 additional homes on land north of the proposed allocation. This would enable an increase in the range of housing types and tenures to be delivered on site, making most efficient use of land and increasing the affordable housing offer.</p> <p>In respect of dwelling size and tenure, Bloor consider the criteria set out to be overly specific, and lacking flexibility. The mix of units to be provided on any site should be based on the latest SHMA and reflect local characteristics. Consideration should also be given to the implications of these criteria for the efficient use of land, their appropriateness for each site and the market for the homes to be provided.</p> <p>As previously highlighted in our Regulation 18 representations concerning Strategic Policy H5, the proposed requirement for at least 6% self-build and custom build properties is introducing further technical challenges to an already complex planning system, which will ultimately hinder the delivery of much needed homes and facilities. The health and safety complications of delivering such properties should not be underestimated and there is limited evidence that self / custom build properties are working in practice. The reality is that the additional burden such properties place on developments is significant, placing additional management time / cost / resource on projects with potentially no customer interest or uptake at the end of the process. The existence of a register is not sufficient evidence to justify such a need exists as it is simply a list with no criteria-based requirement.</p> <p>The section on acceptable and adaptable homes should be retitled ‘accessible and adaptable homes’. Bloor Homes consider that the policy needs to allow sufficient flexibility to factor in site circumstances for example topography etc. as this could affect levels, requiring retaining structures etc. As currently drafted it is insufficiently flexibly to reflect individual site circumstances. Furthermore, it is Bloor’s experience that M4(3) properties are not of great interest to prospective purchasers and are more expensive to build.</p> <p>The requirement for schemes of 50 or more homes to include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units must be applied flexibly and be based on a needs analysis supported by appropriate evidence. Consideration should also be given to the impact of this requirement on the viability of a scheme.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Bloor Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. It is considered a range of housing types and tenures can be delivered as part of the Land at Mill Lane, Wickham site (Draft Policy</p>

	<p>WK5). However, there is the potential to expand the draft allocation to provide approximately 60 additional homes on land north of the proposed allocation. This would enable an increase in the range of housing types and tenures to be delivered on site, making most efficient use of land and increasing the affordable housing offer.</p> <p>In respect of dwelling size and tenure, Bloor consider the criteria set out to be overly specific, and lacking flexibility. The mix of units to be provided on any site should be based on the latest SHMA and reflect local characteristics. Consideration should also be given to the implications of these criteria for the efficient use of land, their appropriateness for each site and the market for the homes to be provided.</p> <p>As previously highlighted in our Regulation 18 representations concerning Strategic Policy H5, the proposed requirement for at least 6% self-build and custom build properties is introducing further technical challenges to an already complex planning system, which will ultimately hinder the delivery of much needed homes and facilities. The health and safety complications of delivering such properties should not be underestimated and there is limited evidence that self / custom build properties are working in practice. The reality is that the additional burden such properties place on developments is significant, placing additional management time / cost / resource on projects with potentially no customer interest or uptake at the end of the process. The existence of a register is not sufficient evidence to justify such a need exists as it is simply a list with no criteria-based requirement.</p> <p>The section on acceptable and adaptable homes should be retitled ‘accessible and adaptable homes’. Bloor Homes consider that the policy needs to allow sufficient flexibility to factor in site circumstances for example topography etc. as this could affect levels, requiring retaining structures etc. As currently drafted it is insufficiently flexibly to reflect individual site circumstances. Furthermore, it is Bloor’s experience that M4(3) properties are not of great interest to prospective purchasers and are more expensive to build.</p> <p>The requirement for schemes of 50 or more homes to include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units must be applied flexibly and be based on a needs analysis supported by appropriate evidence. Consideration should also be given to the impact of this requirement on the viability of a scheme.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Crest Nicholson Partnerships and Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32UU-8
<b>Full reference number</b>	ANON-AQTS-32UU-8/10/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>[Please see formatted submission sent by email] - tracked changes cannot be shown in Citizenspace or in this Excel spreadsheet)</p> <p>Policy H5 includes amongst other things requirements relating to accessible and adaptable homes, which state:</p> <p>“Subject to site suitability, on sites of 10 homes or more 5% of all new market homes should be built to wheelchair adaptable standards to meet the requirements of Building Regulations M4(3)(2)(a) and 10% of all new affordable homes should be built to wheelchair accessible standards to meet the requirements of Building Regulations M4(3)(2)(b).</p> <p>Subject to site suitability, all new homes not built as wheelchair user dwellings to meet the requirements of Part M4(3) should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2).”</p> <p>The construction of a proportion of homes that meet accessible and adaptable standards is supported by Crest Nicholson as it will help create safe, accessible environments and promote inclusion and community cohesion in accordance with Paragraph 135 of the Framework. However, it is not clear whether the Council have provided robust evidence to demonstrate that the policy will be viable, particularly the requirement for all dwellings that don't meet the M4(3) standard to meet M4(2). This will be necessary for the Local Plan to be justified and effective.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>We suggest the wording is amended to reflect the previous version of the Local Plan, as follows:</p> <p>“All affordable dwellings, and 25% of market dwellings should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2), subject to site suitability.</p> <p>For schemes of 50 dwellings or more, 4% of all dwellings should be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3), subject to site suitability.”</p>
<b>What is your suggested wording or text for the policy?</b>	<p>We suggest the wording is amended to reflect the previous version of the Local Plan, as follows:</p> <p>“All affordable dwellings, and 25% of market dwellings should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2), subject to site suitability.</p>



	For schemes of 50 dwellings or more, 4% of all dwellings should be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3), subject to site suitability.”
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (commenting on policies and evidence base)</a> <a href="#">Supporting document 2 (Policy SP1 comments)</a> <a href="#">Supporting document 3 (Policy CN1 comments)</a> <a href="#">Supporting document 4 (Policy CN3 comments)</a> <a href="#">Supporting document 5 (Policy D1 comments)</a> <a href="#">Supporting document 6 (Policy D3 comments)</a> <a href="#">Supporting document 7 (Policy T1 comments)</a> <a href="#">Supporting document 8 (Policy NE5 comments)</a> <a href="#">Supporting document 9 (Policy H5 comments)</a> <a href="#">Supporting document 10 (Policy SH2 comments)</a> <a href="#">Supporting document 11 (Integrated Assessment (Sustainability Appraisal))</a>

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	McCarthy Stone & Churchill Living
<b>Personal reference number</b>	ANON-AQTS-3274-9
<b>Full reference number</b>	ANON-AQTS-3274-9/5/H5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Accessible & adaptable homes & Specialist & Supported Housing
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>This comment has been summarised – see supporting information for full response</p> <p>The policy sets out a requirement that, on sites of 10 homes or more, 5% of all new market homes should be built to wheelchair adaptable standards to meet the requirements of Building Regulations M4(3)(2)(a)</p> <p>We would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and the PPG.</p> <p>M4(3) Housing has a cost implication and may serve to reduce the number of dwellings and reduce viability. The cost of providing such housing has not been included within the Viability Report in respect of older persons' housing.</p> <p>Despite the draft plan requiring 5% of older persons' housing to be built for M4(3), we note that an additional cost figure of £115 sq.m shown in Appendix 1, Assumptions Summary of the August 2024 Local Plan Viability Report, has been used for M4(3) housing. This equates to an additional cost of £5,750 per unit. Additional M(4) 3 costs would include fixtures and fittings, services and controls and increased room dimensions and layout which add up to 30% more floorspace with a corresponding reduction in density, sales values and affordability of such housing. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement and the cost is likely to be much greater than the £115 per sqm used in the study. Indeed, we note that Dixon Searle have used higher figures for other Local Plan Viability studies across the country. For example, in Horsham a value of £10,307 or 5% of build cost was used.</p> <p>A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing. Older people's housing and particularly extra care housing should therefore be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.</p>

	<p>Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that “the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support’, the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons’ housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons’ housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person’s housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons’ scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan.</p> <p>Specialist and Supported housing</p> <p>We welcome the amendment to the policy removing the reference to ‘there is an identified need’. However, our preference would still be for a stand-alone policy to meet the substantial need for older person’s housing to be introduced. Example provided in full representation.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or</i></p>	<p>Yes  <a href="#">Letter (Commenting on policies)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Obsidian Strategic Asset Management Ltd
<b>Personal reference number</b>	ANON-AQTS-32NA-D
<b>Full reference number</b>	ANON-AQTS-32NA-D/1/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>This representation responds to Policy H5 (Meeting Housing Needs) and seeks policy refinement to a) identify needs for specialist housing for older people; and b) subsequent allocation of sites to meet this need. This will ensure Policy H5 is effective and consistent with national policy.</p> <p>In support of these representations, we have submitted via email (<a href="mailto:planningpolicy@winchester.gov.uk">planningpolicy@winchester.gov.uk</a>) the following supporting documents, and we would be grateful if these could be uploaded alongside these representations:</p> <ol style="list-style-type: none"> <li>a. Representations Letter</li> <li>b. Vision Document</li> <li>c. SPRU Briefing Note on Need for Specialist Housing for Older People</li> <li>d. Glanville Technical Note on Transport</li> <li>e. Glanville Technical Note on Flood Risk and Drainage</li> <li>f. Landscape Technical Note by Cornus Landscape Planning and Design</li> </ol> <p>The draft Plan in its present form, proposes only two sites to meet specialist accommodation for older people with an indicative combined yield of 150-170 units. This compares to the SHMA that identifies a need for 998 homes with access to support, such as sheltered housing or retirement living; 620 homes with care provided (both market and affordable provision) to be met through provision of extra care housing; and around 800 care or nursing home bedspaces in the shorter time frame to 2036.</p> <p>Accordingly, in the absence of any significant degree of allocation for specialist older persons housing, we object to the current strategy as it is passive, relying on other sites providing ad hoc and uncoordinated provision. There is currently no clear pipeline of development of specialist homes, notwithstanding the acute need identified in the SHMA and our own evidence. Policy H5 therefore needs to be more specific and identify the quantum of specialist housing for older people required to be delivered; and identifying sites to deliver this requirement.</p> <p>In seeking these changes to Policy H5, we also provide details of our client's site at Headbourne Worthy (in the form of a Vision Document) that should be allocated as an additional housing site to meet the need for specialist 'retirement village' housing for older people, as justified below. The Vision Document is informed by</p>

	a number of technical documents that are also provided. These have confirmed the site is appropriate for development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	In the context of the above, we consider that the Local Plan (Policy H5) needs to identify a) a specific requirement for specialist housing for older people of at least 998 homes as evidenced by the SHMA (this is excluding the need for additional extra-care and care home accommodation identified); and b) identify a greater number of specialist housing sites for IRCs that can meet this demand. To this end, the land north west of Springvale Road, Headbourne Worthy (as identified within the enclosed Vision Document) should be allocated for specialist retirement housing in order to assist in meeting the lack of provision for specialist housing for older people. An experienced retirement housing provider is connected to the promotion of this land and can deliver the type of development advocated by the Mayhew Report. Moreover, the site would also allow the Council to deliver more traditional housing in the face of increasing housing needs (particularly given the recent proposed changes to the NPPF and standard methodology for calculating housing need) by freeing up existing housing resource that is being used by older people in the absence of more specialist accommodation.
<b>What is your suggested wording or text for the policy?</b>	Proposals for well designed specialist and supported housing will be supported where the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided. Numbers of people aged over 65 are projected to increase by 12,400 (49%) between 2016-36 with a substantial growth of 8,700 persons aged 75+. Accordingly, in order to ensure the increasing need for older persons housing is met, the Council has identified the following additional sites for retirement living, of typically between 100-200 units, that can provide 24/7 staffing and communal services and facilities, thereby being more effective in providing optimal care and living standards for older persons and reducing the cost and complexity of care coordination in otherwise dispersed developments. <ul style="list-style-type: none"> <li>• Land North West of Springvale Road, Headbourne Worthy</li> <li>• ..... (continuation of policy).</li> </ul>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (Commenting on policy H5 and site promotion)</a> <a href="#">Supporting Document 1 (Briefing Note on Need for Specialist Housing for Older People)</a> <a href="#">Supporting Document 2 (Flood Risk and Drainage Technical Note)</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting Document 3 \(Transport appraisal\)](#)

[Supporting Document 4 \(Landscape technical note\)](#)

[Supporting Document 5 \(Vision document - Land at Headbourne Worthy\)](#)

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/15/H5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Bargate Homes acknowledge the provision of self-build and custom build homes within Winchester and their role in aiding the council to meet its housing need requirements through the new local plan period. However, we feel that LPAs should not introduce mandatory requirements for developments of a certain size to provide a certain percentage or number of Self and/or Custom Build plots.</p> <p>Given the nature of this product, it is much better suited to specific developers rather than enforced on every developer and subsequently shoe-horned into a wider development. Self and Custom Build housing also means houses on larger developments are delayed in coming forward, adding to the housing crisis. Whilst we acknowledge it is important to have the choice of varying types of housing, larger development sites (40-250+) should focus on the delivery of housing in sequence as approved by the planning permission. LPAs should therefore allocate standalone sites for Self and Custom Build housing.</p> <p>Further, any plots delivered for self-build homes should not be subject to requirements for affordable housing, unless a developer wishes to deliver affordable self/custom build homes (i.e. discount market sale). The Policy meets a specific demand and legal requirement and should be separated from the overall number of dwellings which would be subject to the percentage affordable target.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The policy should add flexibility to confirm that self or custom build homes should only be delivered where feasible. It should also be expanded to acknowledge that the percentage of self-build homes should not account towards the overall affordable housing requirement.
<b>What is your suggested wording or text for the policy?</b>	<p>Where a proposal's characteristics make it unsuitable for self/custom build provision, for example, specialist/older person accommodation, exemption from the policy will be considered on an individual basis. This exemption should also apply where it is unreasonable or unfeasible to deliver self-build homes.</p> <p>Additional wording/supporting paragraph: The provision of self-build or custom build homes on a development site is not expected to contribute towards the overall number of dwellings which would be subject to the percentage affordable target.</p>
<b>Do you agree with how the policy will be monitored?</b>	



<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/21/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Policy H5 (meeting housing needs) sets out that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its occupiers. Bloor supports the use of the SHMA as the basis for determining dwelling size and tenure and the inclusion of the text “unless evidence of local needs or the circumstance of the site justifies an amended approach” as this will help ensure schemes which are needed by the local area are delivered. Policy H5 is noted to require schemes of fifty dwellings or more to include an element designed and marketed to meet the needs of older persons, or other local specialist needs. Bloor do not object to the requirement to deliver specialist housing, however, emphasise the importance of provision being in line with local needs, market intelligence and site viability. An assessment produced by Tetlow King Planning, on behalf of Bloor, reveals a significant provision of suitable specialist housing schemes for older people within a 5km radius of the site. Therefore the immediate local populations needs are considered to be met and Bloor consider that specialist accommodation would not be required on site.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Policy H5 (meeting housing needs) sets out that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its occupiers. Bloor supports the use of the SHMA as the basis for determining dwelling size and tenure and the inclusion of the text “unless evidence of local needs or the circumstance of the site justifies an amended approach” as this will help ensure schemes which are needed by the local area are delivered. Policy H5 is noted to require schemes of fifty dwellings or more to include an element designed and marketed to meet the needs of older persons, or other local specialist needs. Bloor do not object to the requirement to deliver specialist housing, however, emphasise the importance of provision being in line with local needs, market intelligence and site viability. An assessment produced by Tetlow King Planning, on behalf of Bloor, reveals a significant provision of suitable specialist housing schemes for older people within a</p>

	5km radius of the site. Therefore the immediate local populations needs are considered to be met and Bloor consider that specialist accommodation would not be required on site.
<b>What is your suggested wording or text for the policy?</b>	PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW. Policy H5 (meeting housing needs) sets out that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its occupiers. Bloor supports the use of the SHMA as the basis for determining dwelling size and tenure and the inclusion of the text “unless evidence of local needs or the circumstance of the site justifies an amended approach” as this will help ensure schemes which are needed by the local area are delivered. Policy H5 is noted to require schemes of fifty dwellings or more to include an element designed and marketed to meet the needs of older persons, or other local specialist needs. Bloor do not object to the requirement to deliver specialist housing, however, emphasise the importance of provision being in line with local needs, market intelligence and site viability. An assessment produced by Tetlow King Planning, on behalf of Bloor, reveals a significant provision of suitable specialist housing schemes for older people within a 5km radius of the site. Therefore the immediate local populations needs are considered to be met and Bloor consider that specialist accommodation would not be required on site.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a> <a href="#">Supporting document 1 (South Winchester Vision Document)</a> <a href="#">Supporting document 2 (Response to the delivery of housing)</a> <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a> <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a> <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a>

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Richard Doughty
<b>Personal reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council
<b>Full reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council/10/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support policy H5 and the need for affordable housing as it is very relevant to New Alresford. We also emphasize the need for social rented housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/7/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H5</p> <p>Policy H5 sets out the approach of the Local Plan to meeting the housing needs of residents. The policy includes support for older persons housing, which is welcomed. It is also noted and welcomed that paragraphs 9.8 and 9.13 specifically note the need to provide accommodation for older people, and that paragraph 9.8 in particular distinguishes 'older persons housing' from 'care accommodation'</p> <p>It is suggested that the reference to older persons housing in Policy H5 could usefully be broadened and defined to ensure that a variety of types and tenures of housing suitable for older people can be provided with the support of the Local Plan. For example, Blue Cedar Homes Ltd and a specialist provider of homes for older people, including retirement properties, which will satisfy the needs of a number of groups of older people in society. It would make the policy clearer and more effective if the differing types of older people's accommodation could be set out and their provision supported.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>It is suggested that the reference to older persons housing in Policy H5 could usefully be broadened and defined to ensure that a variety of types and tenures of housing suitable for older people can be provided with the support of the Local Plan. For example, Blue Cedar Homes Ltd and a specialist provider of homes for older people, including retirement properties, which will satisfy the needs of a number of groups of older people in society. It would make the policy clearer and more effective if the differing types of older people's accommodation could be set out and their provision supported.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	English Oak Care Homes
<b>Personal reference number</b>	BHLF-AQTS-32EJ-D
<b>Full reference number</b>	BHLF-AQTS-32EJ-D/5/H5
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H5 – Meeting Housing Needs</p> <p>3.13 This policy confirms that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its occupiers in line with the other policies in this Plan. It sets out that proposals for well-designed specialist and supported housing (including older persons housing) will be supported where the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided. Schemes of 50 dwellings or more should include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should be provided in the same proportion as the requirements for the site as a whole. The amount of specialist and supported housing should be in line with local needs, market intelligence and site viability. In applying this policy, the Council will take account of the nature of the scheme and the practicalities of providing and managing affordable units.</p> <p>3.14 The proposed policy is largely supported; however it is considered that each proposal for Specialist and Supported Housing should be judged on a case by case basis, particularly where the provision for dementia care is concerned. In some instances, occupants of the housing cannot undertake day to day tasks on their own and require around the clock care, it is therefore considered that such housing does not need to be well integrated in the local community and in close proximity to local services and facilities as there would be no benefit as a result.</p> <p>3.15 Strategic Policy H5 does not set out a specific housing provision for Specialist and Supported Housing which is disappointing. In light of the findings of SHMA, in particular Paragraph 6.6 which confirms that Winchester is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by nearly 50% over the 20-years to 2036. This compares with overall population growth of 21% and a more modest increase in the Under 65 population (increasing by 13%). From this it is evident that Winchester’s need for Specialist and Supported Housing is going to be</p>

	<p>significantly higher than the country's overall population growth and as such should be planning accordingly to meet this need.</p> <p>3.16 In addition, Paragraph 6.15 of the SHMA sets out: "Of particular note are the large increases in the number of older people with dementia (increasing by 74% from 2016 to 2036) and mobility problems (64% increase over the same period). Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population. When related back to the total projected change to the population, the increase of 3,100 people with a mobility problem represents 12% of the total projected population growth."</p> <p>3.17 This further confirms that there is a significant need to provide dementia care as part of the Specialist and Supported Housing. It is emphasised that the land south and west of Shedfield Lodge can provide a key contribution to meeting the current and future Specialist and Supported Housing needs in Winchester District. Further details on the opportunity are provided in Section 4 of this Statement.</p> <p>see further information in supporting information</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Letter (commenting on policies)</a>  <a href="#">Supporting document 1 (need/demand report for Oak Care Village)</a></p>



<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	James McAllister-Jones
<b>Personal reference number</b>	BHLF-AQTS-326A-N
<b>Full reference number</b>	BHLF-AQTS-326A-N/5/H5
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy H5: Meeting Housing Need</p> <p>Thakeham supports the general housing mix, and the accessible and adaptable requirements set out in this Policy. However, we do not believe the proposed requirement to deliver 6% self-build and custom build housing on sites over 50 dwellings is reasonable. Looking at the Site allocations within the emerging Plan, this would require delivery of 570 self or custom build homes.</p> <p>Given the latest published information states there are currently only 26 active individuals on the Council's self-build register, this suggests there is no real demand for self or custom build here.</p> <p>It is therefore clear that a requirement for 6% across all sites over 50 dwellings would be a significant over-supply and detrimental to delivery of other more needed housing types.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies and proposed site)</a></p> <p><a href="#">Supporting information (vision document)</a></p>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/17/H5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Gladman support 'dwelling size and tenure' provisions in Policy H5 which are supported by the SHMA document and the 2024 update.</p> <p>Gladman welcome the flexibility in the wording of Policy H5 which includes on sites of 50 or more dwellings to allow a minimum of 6% self-build plots which have been unsuccessfully marketed for 12 months to be made available on the open market or built out and sold by the developer.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Supporting information (commenting on policies and proposed site)</a></p>

*such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/21/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates notes that ‘needs’ work which underpins this policy as presented in “Winchester Strategic Housing Market Assessment (SHMA),” and supports the delivery of homes for all parts of the community.</p> <p>8.22 We note the need for accessible and adaptable homes and confirm that these can be provided at Land to the rear of Thody's.</p> <p>8.23 The Policy is ‘sound,’ but as with other proposed non-strategic policies of the Local Plan the Council will need to ensure its application is cautious to ensure it does not create an undue burden on the providers of accommodation for older people, to ensure timely delivery.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (commenting on policies and evidence base)</a></p>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/20/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website.</p> <p>Legally compliant Yes</p> <p>Positively prepared Yes</p> <p>Sound Yes Justified Yes</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective Yes</p> <p>Compliant with national policy Yes</p> <p>8.21 Wates notes that 'needs' work which underpins this policy as presented in "Winchester Strategic Housing Market Assessment (SHMA)," and supports the delivery of homes for all parts of the community.</p> <p>8.22 We note the need for accessible and adaptable homes and confirm that these can be provided at Land at Brightlands.</p> <p>8.23 The Policy is 'sound,' but as with other proposed non-strategic policies of the Local Plan the Council will need to ensure its application is cautious to ensure it does not create an undue burden on the providers of accommodation for older people, to ensure timely delivery.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>



<b>Policy/Evidence base document</b>	H5
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/19/H5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>8.21 Wates notes that 'needs' work which underpins this policy as presented in "Winchester Strategic Housing Market Assessment (SHMA)," and supports the delivery of homes for all parts of the community.</p> <p>8.22 We note the need for accessible and adaptable homes and confirm that these can be provided at Land at Pudding Farm.</p> <p>8.23 The Policy is 'sound,' but as with other proposed non-strategic policies of the Local Plan the Council will need to ensure its application is cautious to ensure it does not create an undue burden on the providers of accommodation for older people, to ensure timely delivery.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

Local Plan Reference or document	Policy H6 Affordable Housing	
Total Number of Representations received	22	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	13	2
Sound	5	11
Complies with Duty to Cooperate	14	1
<p><b>Summary of Representations</b></p> <p>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.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/68/H6  ANON-AQTS-3291-8/8/H6  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/40/H6</b>  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</p>		

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

**Main issues raised in representations received in regulation 19 consultation**

- 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.

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/68/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/8/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>FH support the delivery of affordable housing within the District. We support the recognition of higher costs associated with development of previously developed land and the reduced affordable housing targets for such circumstances. We are also supportive of the reduced targets where phosphate mitigation is required. While the reduced provision on viability grounds is supported, the Inspector should be aware that the SHMA identifies an affordable need significantly in excess of 40% of the total housing requirement. We reiterate our comments above from Policy H1, where we note the District's annual affordable need equates to over 82% of the Standard Method need for the District.</p> <p>Policy H6 is sound, However, in order to account for the reduced provision of affordable housing through H6, a significantly increased housing requirement is required if the acute affordable housing needs are to be met.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>FH support the delivery of affordable housing within the District. We support the recognition of higher costs associated with development of previously developed land and the reduced affordable housing targets for such circumstances. We are also supportive of the reduced targets where phosphate mitigation is required. While the reduced provision on viability grounds is supported, the Inspector should be aware that the SHMA identifies an affordable need significantly in excess of 40% of the total housing requirement. We reiterate our comments above from Policy H1, where we note the District's annual affordable need equates to over 82% of the Standard Method need for the District.</p> <p>Policy H6 is sound, However, in order to account for the reduced provision of affordable housing through H6, a significantly increased housing requirement is required if the acute affordable housing needs are to be met.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>FH support the delivery of affordable housing within the District. We support the recognition of higher costs associated with development of previously developed land and the reduced affordable housing targets for such circumstances. We are also supportive of the reduced targets where phosphate mitigation is required. While the reduced provision on viability grounds is supported, the Inspector should be aware that the SHMA identifies an affordable need significantly in excess of 40% of the total housing requirement. We reiterate our comments above from Policy H1, where we note the District's annual affordable need equates to over 82% of the Standard Method need for the District.</p>

	Policy H6 is sound, However, in order to account for the reduced provision of affordable housing through H6, a significantly increased housing requirement is required if the acute affordable housing needs are to be met.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a> <a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a> <a href="#">Supporting document 2 (Location Plan)</a> <a href="#">Supporting document 3 (Concept Plan)</a> <a href="#">Supporting document 4 (Illustrative masterplan)</a> <a href="#">Supporting document 5 (Access and Transport Report)</a> <a href="#">Supporting document 6 (Landscape and visual study)</a> <a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a> <a href="#">Supporting document 8 (Interim Ecology Assessment)</a> <a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a> <a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a> <a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a> <a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a>



<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/40/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We would like to see this policy have a local letting policy for Market Towns and larger rural settlements at the very least for the first let
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/12/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Vistry Partnerships agrees that a policy such as this is necessary to secure the provision of affordable housing. However, Vistry Partnerships are concerned that the policy wording creates a lack of certainty. This is particularly in respect of the proposals to reduce the affordable housing tariff, where developments are required to mitigate the impact of additional nitrates and phosphates on the River Itchen SAC.</p> <p>Whilst it is understood why the affordable housing tariff might need to be reduced to ensure viability, the proposal to reinstate a higher requirement in future (if and when the costs of nutrient-related mitigation reduce) is not likely to be workable and effective. Specifically, draft Policy H6 states that:</p> <p>“All affordable housing will be secured by use of a s106 agreement, which should include a requirement to increase of provision of affordable housing up to the 40% overall target (30% for previously developed sites) if the costs of nitrate and phosphate mitigation reduces significantly.”</p> <p>It is not clear how changes in cost would be measured and monitored in-practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective ‘value capture’ mechanism for the envisaged purposes.</p> <p>Indeed, noting that the evidence base is unclear when the cost of mitigation will reduce (if this occurs at all) an uplift in the overall housing requirement appears to be outright necessary to ensure that affordable housing needs are fully met.</p> <p>Draft Policy H6 sets out the affordable housing requirements with a 40% requirement for greenfield sites and 30% requirement for brownfield sites (in recognition of the increased development costs associated with brownfield land). With the Council’s priority on brownfield sites in the first half of the Plan period, only 30% affordable housing will be provided per site. This assumes a policy compliant amount will be provided, despite it being widely recognised that Brownfield sites frequently require additional work (such as ground remediation), as evidenced by the under-delivery of affordable housing during the Plan-period of the adopted LPP1.</p> <p>This will limit the ability for the Plan to address the specific needs of the District’s communities that are in need for affordable housing provision – contrary to the clear objective set out in paragraph 60 of the NPPF.</p>

	Another solution of addressing the affordability and affordable housing delivery problems within the District is to allocate a greater number of homes on greenfield sites. This would ensure the allocated sites have a requirement to deliver 40% affordable homes on each site thereby increasing the overall support of affordable housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Vistry Partnerships suggest that the affordable housing tariff be set at 25% and 35% (respectively for previously developed and greenfield sites), with this matter being revisited through the Local Plan Review mechanism and no later than 5-years of the anniversary of the Plan's adoption. In Vistry Partnerships view, and as previously noted, in order to off-set the resultant shortfall in affordable housing currently experienced by WCC, the Local Plan should increase the overall housing requirement and allocate additional land for development. The consequential increase in market housing provision will facilitate the viability and supply of new affordable homes.
<b>What is your suggested wording or text for the policy?</b>	Vistry Partnerships suggest that the affordable housing tariff be set at 25% and 35% (respectively for previously developed and greenfield sites), with this matter being revisited through the Local Plan Review mechanism and no later than 5-years of the anniversary of the Plan's adoption. In Vistry Partnerships view, and as previously noted, in order to off-set the resultant shortfall in affordable housing currently experienced by WCC, the Local Plan should increase the overall housing requirement and allocate additional land for development. The consequential increase in market housing provision will facilitate the viability and supply of new affordable homes.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and evidence base - includes tables)</a> <a href="#">Supporting document 1 (Affordable Housing Statement)</a> <a href="#">Supporting document 2 (Vision Document 1 - Pitt Vale)</a> <a href="#">Supporting document 3 (Vision Document 2)</a> <a href="#">Supporting document 4 (Landscape and Visual Technical Note)</a> <a href="#">Supporting document 5 (Biodiversity Net Gain Feasibility Report)</a>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Sandra McLaren
<b>Personal reference number</b>	ANON-AQTS-32UZ-D
<b>Full reference number</b>	ANON-AQTS-32UZ-D/3/H6
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Social Housing plans are not mentioned as a separate policy. There is a fundamental need for noticeable amount of social housing to be built in the short and medium term, never mind such plans for the long term. While Social Rent is mentioned in Policy H6 and in the Glossary definition of Affordable Housing, Social Housing is NOT the same as Affordable Housing - even Affordable Housing at a Social Rent.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Social Housing plans are not mentioned as a separate policy. There is a fundamental need for noticeable amount of social housing to be built in the short and medium term, never mind such plans for the long term. While Social Rent is mentioned in Policy H6 and in the Glossary definition of Affordable Housing, Social Housing is NOT the same as Affordable Housing - even Affordable Housing at a Social Rent.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Martin Miller, tor&co Ltd (Formerly Terence O'Rourke Ltd)
<b>Personal reference number</b>	ANON-AQTS-32UM-Z
<b>Full reference number</b>	ANON-AQTS-32UM-Z/6/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Paragraph 66 of the NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development provides solely for build to rent homes or provides specialist accommodation for a group of people with specific needs, such as purpose-built accommodation for the elderly.</p> <p>As currently drafted, Policy H6 of the plan (which deals with affordable housing) applies to all developments in the district which increase the supply of housing by ten dwellings or more, irrespective of whether the scheme seeks to provide housing for specific groups. This will disproportionately affect those types of scheme which are exempt under the NPPF, such as specialist accommodation for the elderly.</p> <p>Consequently, Policy H6 does not accord with national planning policy and should be re worded accordingly.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Paragraph 66 of the NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development provides solely for build to rent homes or provides specialist accommodation for a group of people with specific needs, such as purpose-built accommodation for the elderly.</p> <p>As currently drafted, Policy H6 of the plan (which deals with affordable housing) applies to all developments in the district which increase the supply of housing by ten dwellings or more, irrespective of whether the scheme seeks to provide housing for specific groups. This will disproportionately affect those types of scheme which are exempt under the NPPF, such as specialist accommodation for the elderly.</p> <p>Consequently, Policy H6 does not accord with national planning policy and should be re worded accordingly.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>'... In order to help meet affordable housing needs, all development which increases the supply of housing by 10 dwellings or more (or is on sites of over 0.5 hectares) will be expected to provide at least;</p> <ul style="list-style-type: none"> <li>i. 40% of the gross number of dwellings as affordable housing;</li> <li>ii. On previously developed land, in recognition of the increased development costs including costs of land, the proportion of affordable housing will be no less than 30%.</li> </ul> <p>Exemptions to this requirement should also be made where the site or proposed development:</p> <ul style="list-style-type: none"> <li>a) provides solely for Build to Rent homes;</li> <li>b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);</li> <li>c) is proposed to be developed by people who wish to build or commission their own homes; or</li> <li>d) is exclusively for affordable housing, a community-led development exception site or a rural exception site.</li> </ul> <p>in line with the NPPF (2023). ...'</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/10/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Catesby agrees that a policy such as this is necessary to secure the provision of affordable housing. However, Catesby is concerned that the policy wording creates a lack of certainty. This is particularly true of the proposals to reduce the affordable housing tariff, where developments are required to mitigate the impact of additional nitrates and phosphates on the River Itchen SAC.</p> <p>Whilst it is understood why the affordable housing tariff might need to be reduced to ensure viability, the proposal to reinstate a higher requirement in future (if and when the costs of nutrient-related mitigation are reduced) is not likely to be workable and effective. Specifically, draft Policy H6 states that:</p> <p>“All affordable housing will be secured by use of a s106 agreement, which should include a requirement to increase of provision of affordable housing up to the 40% overall target (30% for previously developed sites) if the costs of nitrate and phosphate mitigation reduces significantly.”</p> <p>It is not clear how changes in cost would be measured and monitored in practice, and therefore, it is uncertain whether schedules in a Section 106 Agreement would provide an effective ‘value capture’ mechanism for the envisaged purposes.</p> <p>Indeed, given that the evidence base is unclear about when the cost of mitigation will reduce (if this occurs at all), an uplift in the overall housing requirement appears to be outright necessary to ensure that affordable housing needs are fully met.</p> <p>Draft Policy H6 sets out the affordable housing requirements with a 40% requirement for greenfield sites and a 30% requirement for brownfield sites (in recognition of the increased development costs associated with previously developed land). The interrelationship with the envisaged ‘brownfield first’ approach also has to be considered, as the Council are effectively contending that for the first half of the Plan period (i.e. when PDL sites are to come forward, rather than greenfield allocations), only 30% of new dwelling will be affordable homes. This is assuming that PDL sites will be able to deliver a policy-compliant level of affordable housing when many are unlikely to be able to achieve this (as evidenced by the under-delivery of affordable housing during the Plan-period of the adopted LPP1).</p> <p>Overall, the approach proposed in Policy H6 is likely to hinder the Plan’s capacity to address the housing needs of different communities and groups. This is then contrary to the priorities of NPPF paragraph 60.</p>



	<p>To offset the shortfall in affordable housing, the Local Plan should increase the overall housing requirement and allocate additional land for development. The consequential increase in market housing provision will facilitate the viability and supply of new affordable homes.</p> <p>Furthermore, the Plan should be revised to allocate additional sites that have the potential to provide on-site nutrient mitigation. Land South of Titchfield Lane is one such site. It, therefore, merits proper consideration for allocation, as it could provide nutrient mitigation as an integral part of the scheme design without significant impacts on build costs. Consequently, it would also be possible to provide affordable housing as per the proposed policy requirement.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Catesby considers that the affordable housing tariff should be set at 25% and 35% (respectively for previously developed and greenfield sites), with this matter being revisited through the Local Plan Review mechanism.</p> <p>As previously noted, to address the shortfall in affordable housing currently experienced (and which the new Local Plan effectively proposes to perpetuate), the Local Plan should also increase the overall housing requirement and allocate additional land for development. The consequential increase in market housing provision will facilitate the viability and supply of new affordable homes.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Please see the above recommendations. The proposal to restrict the delivery of greenfield sites is contrary to national planning policy, not justified and likely to be ineffective. The concept should be removed from the policy wording specifically and the Plan as a whole.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a></p> <p><a href="#">Supporting document 2 (Vision Framework)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a></p>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/33/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Bloor Homes broadly supports the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district. At sites such as Land at Mill Lane, Wickham (Draft Policy WK5), Bloor Homes will aim to provide 40% affordable housing provision, equating to 16 units, thus making an important contribution to local need for affordable homes provided commercial considerations are balanced.</p> <p>However, we consider that this draft allocation should be expanded to include approximately 60 additional units on land to the north of the allocation, which has previously been promoted. This amendment would increase the total number of units to around 100, with up to 40 provided as affordable housing.</p> <p>It is also noted that for market-led housing schemes, targets are provided for affordable housing provision based on 'low cost home ownership' and 'social rent or affordable rent'. To ensure that the right type of affordable homes is delivered in the right locations, such targets should be applied flexibly based on local need and site- specific circumstances. This will also ensure that the local plan is responsive to potential shifts or changes in local affordable housing need over the duration of the plan period, as referenced at paragraph 9.42.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Bloor Homes broadly supports the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district. At sites such as Land at Mill Lane, Wickham (Draft Policy WK5), Bloor Homes will aim to provide 40% affordable housing provision, equating to 16 units, thus making an important contribution to local need for affordable homes provided commercial considerations are balanced.</p> <p>However, we consider that this draft allocation should be expanded to include approximately 60 additional units on land to the north of the allocation, which has previously been promoted. This amendment would increase the total number of units to around 100, with up to 40 provided as affordable housing.</p> <p>It is also noted that for market-led housing schemes, targets are provided for affordable housing provision based on 'low cost home ownership' and 'social rent or affordable rent'. To ensure that the right type of affordable homes is delivered in the right locations, such targets should be applied flexibly based on local need and site- specific circumstances. This will also ensure that the local plan is responsive to potential shifts</p>

	or changes in local affordable housing need over the duration of the plan period, as referenced at paragraph 9.42.
<b>What is your suggested wording or text for the policy?</b>	<p>Bloor Homes broadly supports the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district. At sites such as Land at Mill Lane, Wickham (Draft Policy WK5), Bloor Homes will aim to provide 40% affordable housing provision, equating to 16 units, thus making an important contribution to local need for affordable homes provided commercial considerations are balanced.</p> <p>However, we consider that this draft allocation should be expanded to include approximately 60 additional units on land to the north of the allocation, which has previously been promoted. This amendment would increase the total number of units to around 100, with up to 40 provided as affordable housing.</p> <p>It is also noted that for market-led housing schemes, targets are provided for affordable housing provision based on 'low cost home ownership' and 'social rent or affordable rent'. To ensure that the right type of affordable homes is delivered in the right locations, such targets should be applied flexibly based on local need and site- specific circumstances. This will also ensure that the local plan is responsive to potential shifts or changes in local affordable housing need over the duration of the plan period, as referenced at paragraph 9.42.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies, policies map and evidence base)</a></p> <p><a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	McCarthy Stone & Churchill Living
<b>Personal reference number</b>	ANON-AQTS-3274-9
<b>Full reference number</b>	ANON-AQTS-3274-9/4/H6
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>, in relation to housing need, the council's 2024 SHMA concludes the following in relation to housing for older people.</p> <p>Overall, the analysis suggests that there will be a need for housing with support (retirement/sheltered housing) in the market sector, but there is sufficient supply of affordable housing. The analysis also points to a strong potential need for housing with care (e.g. extra-care) in both the market and rented affordable sectors (87% market housing) (Paragraph 5.35)</p> <p>On the evidence of housing need alone, housing for older people must have a bespoke position in respect of affordable housing. The council's evidence base suggests it would be inappropriate to seek affordable housing on sheltered housing proposals and requiring a generic 30% from extra care housing would also be inappropriate.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>This comment has been summarised – see supporting information for full response</p> <p>The current policy, as worded, would require any proposal for specialist housing for older people to deliver policy compliant affordable housing or to provide a viability assessment if policy compliant on-site affordable housing was not achievable.</p> <p>Reference made to the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available at <a href="https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf">https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf</a> , and outlines concerns tha the viability work undertaken by the Council's consultants Dixon Searle to inform the Plan does not adequately reflect the costs and other factors relevant for speciality housing for older people.</p> <p>Policy costs –BNG</p> <p>Since the price of statutory BNG units have been published it has enabled it to be determined how much BNG may cost and this needs to be incorporated into the viability report at a realistic level. In addition, brownfield site BNG costs are often more substantial than Greenfield, but this very much depends on the site</p>

characteristics. For example, if an older persons' housing scheme consisting of 50 units on a 0.5 hectare site needed to purchase one off-site statutory credit, if this was for the cheapest low quality habitat type this would cost £84,000 or £1,680 per unit given that 2 credits are needed per unit. Older Persons housing schemes are ideally located on small windfall sites close to local facilities and it will most likely be that BNG requirements will need to be met largely or entirely off site by contribution.

Policy cost – M4 (3)

Despite the draft plan requiring 5% of older persons housing to be built for M4(3) and an additional cost figure of £115 sq. m shown in Appendix 1, Assumptions Summary of the August 2024 Local Plan Viability Report the council should note that any M4(3) requirement needs to be considered on top of M4(2), equating to an additional cost of £5,750 per unit. Additional costs include fixtures and fittings, services and controls and increased room dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values, and affordability of such housing. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement and the cost is likely to be much greater than the £115 per sqm used in the study. Indeed, we note that Dixon Searle have used a higher figure for other Local Plan Viability studies across the country. For example, in Horsham a value of £10,307 or 5% of build cost was used.

The inclusion of a requirement for older persons' housing to deliver affordable housing in line with policy H5 will therefore create an unrealistic over aspirational policy requirement that would no doubt result in protracted discussion at the decision-making stage. This would potentially be adversarial, requiring protracted negotiations with Council officers and their commissioned consultants, and result in difficulties with decision makers expecting policy compliancy. As a minimum, the policy should therefore be amended to make it clear that older person's housing is more challenging in viability terms with respect to affordable housing to ensure that the plan is deliverable, justified and consistent with national policy. However, ideally the viability study should be re-run using the correct assumptions.

Reference made to various other local plans which remove the requirement for older persons housing schemes to deliver affordable housing, Cil, etc on grounds of viability.

Overall, the analysis suggests that there will be a need for housing with support (retirement/sheltered housing) in the market sector, but there is sufficient supply of affordable housing. The analysis also points to a strong potential need for housing with care (e.g. extra-care) in both the market and rented affordable sectors (87% market housing) (Paragraph 5.35)

On the evidence of housing need alone, housing for older people must have a bespoke position in respect of affordable housing. The council's evidence base suggests it would be inappropriate to seek affordable housing on sheltered housing proposals and requiring a generic 30% from extra care housing would also be inappropriate.

Recommendation

	<p>In conclusion, whilst we welcome that the Council have tested sheltered and extra care housing in accordance with the PPG on Viability, we have concerns with regard to some of the assumptions that have been used and if amended would be likely to make sheltered and extra care housing not viable. As such the Viability Report should be re-run for sheltered and extra-care housing using the assumptions recommended above and the conclusion drawn out and included within the affordable housing policy as a modification. In reference to housing need alone, sheltered housing should be exempted from an affordable housing requirement and extra care housing provision should reflect the housing needs requirements and updated viability analysis.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>sheltered housing should be exempted from an affordable housing requirement and extra care housing provision should reflect the housing needs requirements and updated viability analysis.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/12/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>9.46 Policy H6 – Affordable Housing provides the latest policy response to the ‘key priority’ identified earlier in the 2040 plan. The challenge of providing sufficient levels of affordable housing to meet needs arising within Winchester district and at Winchester Town specifically has been a long established and chronic problem that remains unresolved. Reference to past rates of delivery shows that policy ambitions are not being realised: (See table within long-format representations submitted via email p.35)</p> <p>9.47 The delivery of affordable housing across the district since 2011 has consistently fallen short of the Council’s policy objectives, and only once in the last twelve years has affordable housing supply as a component of overall supply exceeded 40%. The average over this period has been 33%.</p> <p>9.48 The Council began examining affordable housing delivery against the adopted spatial strategy in its 2020/21 AMR, which shows the MDAs (policies W2, SH2 and SH3) delivered 158 of the 300 affordable homes constructed that year, 53% of the affordable housing completions in the district.</p> <p>9.49 Across the three MDAs an average of 43% of new homes delivered have been affordable, compared to just 22% at Winchester Town, and 36% within the MTRA demonstrating clearly the comparative effectiveness of the MDA strategy.</p> <p>9.50 The paragraphs preceding Policy H6 recognise and assess the problems faced by those trying to access the housing market in Winchester and note at paragraph 9.31 that the affordability of housing in Winchester district continues to be a major issue..therefore the delivery of affordable homes remains a critical priority. These statements naturally provoke the question: what therefore does the Council propose to do about this issue in policy-making terms that differs from the measures that have been taken before that have demonstrably failed to resolve the major/critical issue that the Council recognises and classifies as a ‘key priority’ it must tackle through the policies of this new Local Plan?</p> <p>9.51 The supporting text notes that viability is a key factor in securing delivery and that national policy now requires viability to be taken into consideration when formulating policies that require affordable housing provision. The Council’s own evidence in this regard, referred to in paragraph 9.45 of the supporting text, notes that larger sites will be more able to deliver affordable housing, and that a proportion of 40% should be achievable above the threshold. Notwithstanding, a range of caveats are applied identifying circumstances</p>

	<p>that may militate against provision in line with the need that exists. Policy H6 is then constructed to impose different levels of expected provision according to site characteristics.</p> <p>9.52 Noting that the Council has identified affordable housing delivery as a major/critical priority in policy making, Vistry and Taylor Wimpey highlight the far greater propensity of large MDA scale developments to deliver affordable housing. As has been consistently advocated throughout successive sets of representations to the emerging local plan, the most effective means available to the Council to address the major/critical/chronic problem associated with the affordability of housing within the district is to allocate a greater proportion of new housing to major housing sites, in preference to a pronounced reliance on small sites/windfall sites, which often fall below the threshold for delivery of affordable housing, as key components of the district housing strategy. Small housing sites and previously developed sites, as recognised by the latest iteration of the H6 affordable housing policy, are subject to greater viability challenges and so are less likely to deliver affordable housing, or to do so in quantities that meet the overall objective to tackle this major/critical issue.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>9.46 Policy H6 – Affordable Housing provides the latest policy response to the ‘key priority’ identified earlier in the 2040 plan. The challenge of providing sufficient levels of affordable housing to meet needs arising within Winchester district and at Winchester Town specifically has been a long established and chronic problem that remains unresolved. Reference to past rates of delivery shows that policy ambitions are not being realised: (See table within long-format representations submitted via email p.35)</p> <p>9.47 The delivery of affordable housing across the district since 2011 has consistently fallen short of the Council’s policy objectives, and only once in the last twelve years has affordable housing supply as a component of overall supply exceeded 40%. The average over this period has been 33%.</p> <p>9.48 The Council began examining affordable housing delivery against the adopted spatial strategy in its 2020/21 AMR, which shows the MDAs (policies W2, SH2 and SH3) delivered 158 of the 300 affordable homes constructed that year, 53% of the affordable housing completions in the district.</p> <p>9.49 Across the three MDAs an average of 43% of new homes delivered have been affordable, compared to just 22% at Winchester Town, and 36% within the MTRA demonstrating clearly the comparative effectiveness of the MDA strategy.</p> <p>9.50 The paragraphs preceding Policy H6 recognise and assess the problems faced by those trying to access the housing market in Winchester and note at paragraph 9.31 that the affordability of housing in Winchester district continues to be a major issue..therefore the delivery of affordable homes remains a critical priority. These statements naturally provoke the question: what therefore does the Council propose to do about this issue in policy-making terms that differs from the measures that have been taken before that have demonstrably failed to resolve the major/critical issue that the Council recognises and classifies as a ‘key priority’ it must tackle through the policies of this new Local Plan?</p> <p>9.51 The supporting text notes that viability is a key factor in securing delivery and that national policy now requires viability to be taken into consideration when formulating policies that require affordable housing</p>



	<p>provision. The Council's own evidence in this regard, referred to in paragraph 9.45 of the supporting text, notes that larger sites will be more able to deliver affordable housing, and that a proportion of 40% should be achievable above the threshold. Notwithstanding, a range of caveats are applied identifying circumstances that may militate against provision in line with the need that exists. Policy H6 is then constructed to impose different levels of expected provision according to site characteristics.</p> <p>9.52 Noting that the Council has identified affordable housing delivery as a major/critical priority in policy making, Vistry and Taylor Wimpey highlight the far greater propensity of large MDA scale developments to deliver affordable housing. As has been consistently advocated throughout successive sets of representations to the emerging local plan, the most effective means available to the Council to address the major/critical/chronic problem associated with the affordability of housing within the district is to allocate a greater proportion of new housing to major housing sites, in preference to a pronounced reliance on small sites/windfall sites, which often fall below the threshold for delivery of affordable housing, as key components of the district housing strategy. Small housing sites and previously developed sites, as recognised by the latest iteration of the H6 affordable housing policy, are subject to greater viability challenges and so are less likely to deliver affordable housing, or to do so in quantities that meet the overall objective to tackle this major/critical issue.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a>  <a href="#">Supporting Document (Planning for South Hampshire)</a></p>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Union4 Planning Ltd
<b>Personal reference number</b>	ANON-AQTS-32MQ-V
<b>Full reference number</b>	ANON-AQTS-32MQ-V/6/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H6</p> <p>Policy H6 sets the overall approach to affordable housing within the area. We cannot see a definition however, of the proposals to which the policy applies and this should be clarified as applying to all relevant proposals for housing within Class C3 of the TCP Use Classes Order. Under the terms of the NPPF, affordable housing should be provided in respect of new housing development above the small sites threshold and is specifically in relation to C3 uses. in the absence of such clarification the policy is potentially unsound.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Policy H6</p> <p>Policy H6 sets the overall approach to affordable housing within the area. We cannot see a definition however, of the proposals to which the policy applies and this should be clarified as applying to all relevant proposals for housing within Class C3 of the TCP Use Classes Order.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Policy H6</p> <p>Policy H6 sets the overall approach to affordable housing within the area. We cannot see a definition however, of the proposals to which the policy applies and this should be clarified as applying to all relevant proposals for housing within Class C3 of the TCP Use Classes Order.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies)</a></p>

*included in the representation.  
However, the links provided  
may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/10/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy H6 Affordable housing</p> <p>4.29 This policy is considered to be:</p> <ul style="list-style-type: none"> <li>• Legally compliant</li> <li>• Not Sound</li> <li>• In compliance with the duty to co-operate</li> </ul> <p>4.30 Whilst BSP generally support the inclusion of a level of affordable housing and, in particular, the short-term flexibility built within to reduce the provision of affordable housing to account for any mitigation in relation to phosphates (i.e. if required by development falling within the River Itchen SAC), there is significant concern that the required levels of affordable housing will not be achievable with the current strategy.</p> <p>4.31 The Focused SHMA Update (Iceni, July 2024) notes that the estimated need for social/affordable rented housing (per annum) is 368 for Winchester District and, inclusive of the area covered by the South Downs National Park (SDNP), is 411 social/affordable rented housing units (per annum) (as per Table 3.11 SHMA Update) for the years 2023 to 2040. Additionally, the SHMA Update estimates the annual net need for affordable home ownership at 147 units per annum (as per Table 3.19 SHMA Update), including the SDNP area. This equates to a total need of 9,486 affordable housing units (both rented and home ownership) across the district (including SDNP area), which would be 61% of the total proposed housing land supply, which is considered to be wholly unachievable. As a reference point, an average provision of 40% affordable housing based on the estimated need of 9,468 units from 2023 to 2040 would result in WDC requiring a supply of 23,715 dwellings, albeit noting that this would require an unachievable average provision of affordable housing and therefore would likely need to be substantially higher. For comparison, an average provision of 30% affordable housing would require a housing land supply of 31,620 dwellings.</p> <p>4.32 However, the average provision of affordable housing across the district will inevitably be substantially lower, partially due reduced affordable housing requirements on PDL (30%) and within the River Itchen SAC catchment area (35% greenfield / 25% PDL). Notwithstanding that the viability assessment 2024 reviewed site allocation W2 (Sir John Moore Barracks – PDL site with a 30% affordable housing requirement), evidence</p>

	<p>should be provided to demonstrate that large-scale greenfield sites, including strategic sites such as SH1, SH2 and W1 are likely to be able to achieve 40% affordable housing.</p> <p>4.33 The policy also proposes a set percentage of low-cost home ownership (35%) and Social Rent (65%) where market led schemes are being progressed.</p> <p>4.34 The policy should include flexibility so that the relevant tenure is delivered within the right location, in line with the most recent SHMA at the time of submission of the respective planning application. In particular, the text should be amended as follows (proposed amendment in red):  “For market led housing schemes, the affordable housing should generally be provided in accordance with the following proportions unless more recent evidence suggests alternative proportions (...).”</p> <p>4.35 The generic tenure split will not be applicable to certain parts of Winchester District given its geographic spread and varied market. This flexibility will also mean that the policy can accommodate changes within the market should demands for social rent change during the plan period.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (referring to letter)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	James McAllister-Jones
<b>Personal reference number</b>	BHLF-AQTS-326A-N
<b>Full reference number</b>	BHLF-AQTS-326A-N/4/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Policy H6: Affordable Housing</p> <p>Thakeham wholly supports the Council's target percentage requirement of 40% of new housing development to be affordable housing.</p> <p>It is noted that the policy also sets out the tenure split as 35% low-cost ownership and 65% social rented. Whilst Thakeham supports an appropriate mix of tenures in all our developments, this should not be a definitive requirement and should be based on evidenced local needs in Littleton.</p> <p>Therefore, the wording should be amended to "For market led housing schemes, the affordable housing should, subject to current need, be provided in accordance with the following proportions:"</p> <p>see additional info PDF</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a> <a href="#">Supporting information (vision document)</a>

*allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	YMCA Fairthorne Manor Group   Philpa Spicer
<b>Personal reference number</b>	BHLF-AQTS-328Y-F
<b>Full reference number</b>	BHLF-AQTS-328Y-F/11/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We support the Council’s desire to provide affordable housing via the Local Plan but we are concerned that the Council is not being ambitious enough to truly increase supply to reduce house prices.</p> <p>6.65 Paragraph 2.13 of the Winchester Strategic Housing Market Assessment Update Final Report (July 2024) acknowledges that “The national market is uncertain and since 2020 after a period of significant inflationary pressures and changes to housing and fiscal policy that have driven house prices upwards, house prices are beginning to fall nationally. In Winchester, there is little indication yet that house prices are beginning to fall, however, the rate at which they had historically been increasing has slowed. Affordability has improved slightly; however, Winchester remains significantly less affordable overall when compared to the County, Region, and Country as of 2023, with a tight rental market adding to affordability pressures in the City. Housing delivery in Winchester has improved strongly since 2018/2019. This may be contributing to some of the slower rates of house prices growth seen in recent years in Winchester and should this continue, this will assist in easing affordability pressures in Winchester” (underlining is our emphasis).</p> <p>6.66 This paragraph acknowledges that housing delivery has “improved strongly” and yet house process are not falling in line with neighbouring areas.</p> <p>6.67 In our view, this indicates a level of pent-up demand that is not being addressed by the adopted local plan, and we urge the Council to boost the supply of homes; which would give rise to a correlating rise in affordable housing provision.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	



<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (Table of policies)</a> <a href="#">Letter (commenting on Policies and Evidence Base - includes vision document))</a> <a href="#">Supporting document 1 (Vision Document)</a> <a href="#">Supporting document 2 (Vision Document)</a>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Bellway Strategic Land   Daniel Poole
<b>Personal reference number</b>	BHLF-AQTS-3289-F
<b>Full reference number</b>	BHLF-AQTS-3289-F/7/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We support the Council’s desire to provide affordable housing via the Local Plan but we are concerned that the Council is not being ambitious enough to truly increase supply to reduce house prices.</p> <p>5.76 Paragraph 2.13 of the Winchester Strategic Housing Market Assessment Update Final Report (July 2024) acknowledges that “The national <u>market is uncertain</u> and since 2020 after a period of significant inflationary pressures and changes to housing and fiscal policy that have driven house prices upwards, <u>house prices are beginning to fall nationally. In Winchester, there is little indication yet that house prices are beginning to fall, however, the rate at which they had historically been increasing has slowed.</u> Affordability has improved slightly; however, <u>Winchester remains significantly less affordable overall when compared to the County, Region, and Country</u> as of 2023, with a <u>tight rental market adding to affordability pressures in the City.</u> Housing delivery in Winchester has improved strongly since 2018/2019. This may be contributing to some of the slower rates of house prices growth seen in recent years in Winchester and should this continue, this will assist in easing affordability pressures in Winchester” (underlining is our emphasis).</p> <p>5.77 This paragraph acknowledges that housing delivery has “improved strongly” and yet house process are not falling in line with neighbouring areas.</p> <p>5.78 In our view, this indicates a level of pent-up demand that is not being addressed by the adopted local plan, and we urge the Council to boost the supply of homes; which would give rise to a correlating rise in affordable housing provision.</p> <p>5.79 Regardless of the affordable housing position, it must also be noted and recognised that greenfield sites, such as our client’s site are certain to deliver a policy compliant mix of affordable homes; whereas the percentage of affordable homes is typically lower on brownfield and windfall sites due to competing viability considerations.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (with table)</a> <a href="#">Letter (commenting on policies - includes tables and pictures)</a> <a href="#">Supporting document 1 (Vision Document - Botley Road, Bishops Waltham)</a> <a href="#">Supporting document 2 (pre-application advice from Historic England)</a>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Bargate Homes   Jonathan Quarrell
<b>Personal reference number</b>	BHLF-AQTS-3288-E
<b>Full reference number</b>	BHLF-AQTS-3288-E/7/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We support the Council’s desire to provide affordable housing via the Local Plan but we are concerned that the Council is not being ambitious enough to truly increase supply to reduce house prices.</p> <p>6.97 Paragraph 2.13 of the Winchester Strategic Housing Market Assessment Update Final Report (July 2024) acknowledges that “The national market is uncertain and since 2020 after a period of significant inflationary pressures and changes to housing and fiscal policy that have driven house prices upwards, house prices are beginning to fall nationally. In Winchester, there is little indication yet that house prices are beginning to fall, however, the rate at which they had historically been increasing has slowed. Affordability has improved slightly; however, Winchester remains significantly less affordable overall when compared to the County, Region, and Country as of 2023, with a tight rental market adding to affordability pressures in the City. Housing delivery in Winchester has improved strongly since 2018/2019. This may be contributing to some of the slower rates of house prices growth seen in recent years in Winchester and should this continue, this will assist in easing affordability pressures in Winchester” (underlining is our emphasis).</p> <p>6.98 This paragraph acknowledges that housing delivery has “improved strongly” and yet house process are not falling in line with neighbouring areas.</p> <p>6.99 In our view, this indicates a level of pent-up demand that is not being addressed by the adopted local plan, and we urge the Council to boost the supply of homes; which would give rise to a correlating rise in affordable housing provision.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policies and evidence base)</a> <a href="#">Letter (commenting on policies and evidence base - includes pictures and tables)</a> <a href="#">Supporting document 1 (Map of site - Land at Winchester Road)</a> <a href="#">Supporting document 2 (Briefing note - Winchester Settlement Gap)</a>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Croudace Homes
<b>Personal reference number</b>	BHLF-AQTS-328A-Q
<b>Full reference number</b>	BHLF-AQTS-328A-Q/6/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Policy H6 seek to delivery the affordable homes required over the plan period and sets out that the provision of affordable housing will be required for at least 40% of all new dwellings, on greenfield sites, subject to a number of criteria. We are supportive of the policy aspirations to provide an appropriate level of affordable housing, as Winchester District has one of the highest affordability ratios in the country outside London. 3.30 It is confirmed that Croudace Homes always strive to deliver a policy compliant level of affordable housing to ensure that their developments deliver homes for all.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a>

*may contain additional details,  
such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/17/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates notes that 'needs' work which underpins this policy as presented in "Winchester Strategic Housing Market Assessment and 2024 Update," and supports the delivery of homes for people who cannot access the housing market.</p> <p>8.25 The Local Plan viability work suggests that the provision of Affordable Housing at 40% of residential development is achievable, and therefore Wates supports this too. the caveats around previously developed land, and the need to mitigate the impact of additional phosphates on the River Itchen SAC are also noted. Wates expects that Land to the rear of Thody's can provide up to 40% affordable homes. Affordable housing will be evenly distributed within the site and designed to a high quality, so as to be indistinguishable from other development. The delivery of affordable housing, including mix and tenure, will be secured through a s106 agreement.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (commenting on policies and evidence base)</a></p>



*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/17/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>8.24 Wates notes that 'needs' work which underpins this policy as presented in "Winchester Strategic Housing Market Assessment and 2024 Update," and supports the delivery of homes for people who cannot access the housing market.</p> <p>8.25 The Local Plan viability work suggests that the provision of Affordable Housing at 40% of residential development is achievable, and therefore Wates supports this too. the caveats around previously developed land, and the need to mitigate the impact of additional phosphates on the River Itchen SAC are also noted.</p> <p>8.26 Wates expects that Land at Brightlands can provide up to 40% affordable homes including 35% as low cost home ownership, and 65% as Social Rent or Affordable Rent. Affordable housing will be evenly distributed within the site and designed to a high quality, so as to be indistinguishable from other development. The delivery of affordable housing, including mix and tenure, will be secured through a s106 agreement.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Andy Key
<b>Personal reference number</b>	BHLF-AQTS-3284-A
<b>Full reference number</b>	BHLF-AQTS-3284-A/13/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Fails on being effective.</p> <p>Inconsistent with the Transport policies. No mention of requirement to develop in an area served by affordable means of transport. Occupants of affordable housing are more likely to be in lower-income brackets and therefore less likely to have access to private cars, so have greater-than-average requirements for good public and active travel links. (For example, a Health Foundation study in 2024 found that in the poorest quintile of households, 28% have no access to a car.) This makes it especially important that affordable housing and mixed developments follow the policies laid out in the Transport section.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Add a paragraph to make it clear that affordable housing must have easy access to public transport and active travel networks.
<b>What is your suggested wording or text for the policy?</b>	<p>Add:</p> <p>“It is especially important that affordable housing developments have access to public transport and active transport links as defined in this Plan’s Transport policies. They are not exempt from those requirements.”</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	<p>Yes</p> <p><a href="#">Form (commenting on policies)</a></p> <p><a href="#">Letter (commenting on policies)</a></p>

*However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	F. McElderry
<b>Personal reference number</b>	BHLF-AQTS-328M-3
<b>Full reference number</b>	BHLF-AQTS-328M-3/3/H6
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	50% of houses should be affordable and this needs to be enforceable. The 'decent standard' needs to be specified and to require well insulated (i.e. passive) buildings.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policy)</a>

<b>Policy/Evidence base document</b>	H6
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/16/H6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Legally compliant Yes</p> <p>Positively prepared Yes</p> <p>Sound Yes</p> <p>Justified Yes</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective Yes</p> <p>Compliant with national policy Yes</p> <p>8.24 Wates notes that 'needs' work which underpins this policy as presented in "Winchester Strategic Housing Market Assessment and 2024 Update," and supports the delivery of homes for people who cannot access the housing market.</p> <p>8.25 The Local Plan viability work suggests that the provision of Affordable Housing at 40% of residential development is achievable, and therefore Wates supports this too. The caveats around previously developed land, and the need to mitigate the impact of additional phosphates on the River Itchen SAC are also noted. Wates expects that Land at Pudding Farm can provide up to 40% affordable homes including 35% as low cost home ownership, and 65% as Social Rent or Affordable Rent. Affordable housing will be evenly distributed within the site and designed to a high quality, so as to be indistinguishable from other development. The delivery of affordable housing, including mix and tenure, will be secured through a s106 agreement.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a>



**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[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

<b>Local Plan Reference or document</b>	Policy H7 Affordable Housing Exception Sites to Meet Local Needs	
<b>Total Number of Representations received</b>	4	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	3	1
<b>Sound</b>	2	2
<b>Complies with Duty to Cooperate</b>	4	0
<p><b>Summary of Representations</b>  Two respondents support the policy. One thought Winchester was already providing more housing than required for local needs.</p> <p>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 be included to assist delivery.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  ANON-AQTS-3BJD-V/4/H7  ANON-AQTS-3BSY-T/48/H7  <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/27/H7</b>  ANON-AQTS-32NX-4/1/H7</p>		
<p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Whether the policy sufficiently explains the role market housing can play in delivery;</li> <li>• The basis on which need is assessed; and</li> <li>• The role of community support.</li> </ul>		

<b>Policy/Evidence base document</b>	H7
<b>Name of respondent (or client)</b>	Christine Gardner
<b>Personal reference number</b>	ANON-AQTS-3BJD-V
<b>Full reference number</b>	ANON-AQTS-3BJD-V/4/H7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Winchester has done more than enough to supply local needs for housing, but Barton Farm has housed people from outside our district, who are taking homes which should have been for local people. We should not be required to supply any more homes in Winchester city, except for non-drivers.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Do not build any more dwellings in Winchester city, except perhaps converted shops for non-drivers. We are too crowded, and more homes mean more traffic, which we do not want.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H7
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/48/H7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H7
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/27/H7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H7
<b>Name of respondent (or client)</b>	English Rural Housing Association
<b>Personal reference number</b>	ANON-AQTS-32NX-4
<b>Full reference number</b>	ANON-AQTS-32NX-4/1/H7
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>This comment has been summarised – see supporting information for full response</p> <p>Drepresentation detailing the role of the English Rural Housing Association (EHRA); reference to research on rural housing needs and the role rural exception policies can play in helping to meet them.</p> <p>ERHA support the inclusion of a rural exception sites policy within the Local Plan as an important mechanism to deliver small scale rural affordable housing. However, modifications are required in order to address paragraphs 16 and 35 of the NPPF to ensure a positive framework is set for rural exception sites.</p> <p>Firstly, the policy title should be amended in line with the terminology in national policy to refer explicitly to Rural Exception Sites.</p> <p>The first paragraph of the policy gives additional support for ‘proposals that are community driven or gained the support of the community’. EHRA object to the inclusion of this statement. As demonstrated above in these reps, there is a rural affordable housing crisis across the country, including within this District.</p> <p>Significant additional proposals are needed to come forward if the affordable housing need identified in the SHMA is to be delivered. Community support is not always possible, and ERHA would not support a policy that uses this as a fundamental blockage to the delivery of rural exception sites given the national and local policies imperative to meet needs at the earliest opportunity. The suitability of land must be guided by land-use considerations. This sentence should be deleted.</p> <p>The first part of bullet point i) requires proposals to meet identified local need. This is supported however ERHA wish to highlight that there are a range of evidence sources that will be applicable to identify need including Local Housing Needs Surveys, as well as the Council’s Housing Register. ERHA consider that local housing need surveys can include those commissioned by a community, and those that are commissioned by an applicant. Flexibility is therefore needed to allow a range of sources to be used as evidence of need, including in paragraph 9.55 of the supporting text.</p> <p>Bullet point i) additionally limits development to meeting the needs of ‘the settlement to which that need relates’. It is also further stated in paragraph 9.50 of the supporting text that ‘The local needs to which this policy approach relates will be those arising from the Parish or settlement to which a proposal relates.’ ERHA object to this. There are often cases where exception sites may meet the needs of adjoining parishes,</p>

	<p>particularly where a range of smaller parishes or settlements and development in one will support a range of communities. The NPPF and the PPG at Reference ID: 67-011-20210524 confirms rural exception sites “can come forward in any rural location”. A flexible wording in bullet point i) is required to address these concerns. The final paragraph of the policy is supported. Whilst it is important to ensure the primary purpose is to provide affordable housing in perpetuity, in our experience it is becoming increasingly necessary for proposals to provide some market housing to make the proposal viable and deliverable in the short term, as a result of external factors such as higher build costs and land owner expectation, which must be balanced against delivering affordable housing at the restricted rents affordable to their tenants. This has recently become more evident through the regrading of many registered housing providers from V1 to V2, which reflects the broader decline of economic conditions and business capacity from the disconnect between rent levels and costs. It is recommended for the policy to incorporate and consider market housing to increase the viability of a proposal. The policy and supporting text at present makes no reference to this type of housing nor is there another policy that relates specifically to the deliverability of market housing. Some modifications are recommended to the Policy H7 text as summarised below.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Amend Policy H7 text as follows  Policy H7 – <del>Affordable Housing</del> <u>Rural</u> Exception Sites to Meet Local Needs  In order to maximise affordable housing provision to meet identified affordable housing needs the Local Planning Authority will exceptionally grant permission or allocate sites for the provision of affordable housing to meet the specific local needs of particular settlements, on land where housing development would not normally be permitted. <del>In particular, proposals that are community driven or have gained the support of the community will be looked upon favourably</del>  Development will only be permitted where:  i. The proposal is suitable in terms of its location, size and tenure to meet an identified local housing need <del>that cannot be met within the policies applying to the settlement</del> <u>of the Parish, or group of adjoining Parishes, to which that need relates;</u>  ii. The scheme is of a design and character appropriate to its location and avoids harm to the character of the area or to other planning objectives, taking account of the policy objective to maximise affordable housing provision; and  iii. The affordable housing is secured to meet long term affordable housing needs, and will remain available in perpetuity (subject to any legislative requirements).  Subject to the needs of the local community, the majority of the affordable homes should be for social or affordable rent (with rent levels being a maximum of the Local Housing Allowance level, unless otherwise agreed and evidenced by a viability appraisal). In exceptional circumstances a modest element of other tenures may be allowed on the most suitable identified sites in order to enable a development to proceed, providing no less than 70% of the homes proposed meet priority local affordable housing needs. In these circumstances the applicant should demonstrate that alternative forms of housing e.g self-build or Market</p>

	Housing are required due to the economics of provision, of which an independently verified viability assessment is required to support the application. The quantity, tenure and type of that housing should be limited to that which allows the affordable housing development to proceed.
<b>What is your suggested wording or text for the policy?</b>	<p>Amend Policy H7 text as follows</p> <p>Policy H7 – Affordable Housing <u>Rural</u> Exception Sites to Meet Local Needs</p> <p>In order to maximise affordable housing provision to meet identified affordable housing needs the Local Planning Authority will exceptionally grant permission or allocate sites for the provision of affordable housing to meet the specific local needs of particular settlements, on land where housing development would not normally be permitted. <del>In particular, proposals that are community driven or have gained the support of the community will be looked upon favourably</del></p> <p>Development will only be permitted where:</p> <ol style="list-style-type: none"> <li>i. The proposal is suitable in terms of its location, size and tenure to meet an identified local housing need <del>that cannot be met within the policies applying to the settlement</del> <u>of the Parish, or group of adjoining Parishes, to which that need relates;</u></li> <li>ii. The scheme is of a design and character appropriate to its location and avoids harm to the character of the area or to other planning objectives, taking account of the policy objective to maximise affordable housing provision; and</li> <li>iii. The affordable housing is secured to meet long term affordable housing needs, and will remain available in perpetuity (subject to any legislative requirements).</li> </ol> <p>Subject to the needs of the local community, the majority of the affordable homes should be for social or affordable rent (with rent levels being a maximum of the Local Housing Allowance level, unless otherwise agreed and evidenced by a viability appraisal). In exceptional circumstances a modest element of other tenures may be allowed on the most suitable identified sites in order to enable a development to proceed, providing no less than 70% of the homes proposed meet priority local affordable housing needs. In these circumstances the applicant should demonstrate that alternative forms of housing e.g self-build or Market Housing are required due to the economics of provision, of which an independently verified viability assessment is required to support the application. The quantity, tenure and type of that housing should be limited to that which allows the affordable housing development to proceed.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Letter (commenting on policy)</a>



*All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.*

[Supporting document 1 \(report on homelessness in the countryside\)](#)

[Supporting document 2 \(report on Land, landowners, and the delivery of affordable homes in rural areas\)](#)

[Supporting document 3 \(report on factors in the effective delivery of rural exception sites in england\)](#)

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

Amendment to criterion i of Policy H7 proposed to clarify that schemes may meet need of more than one settlement in the [Proposed Modifications](#).

Local Plan Reference or document	Policy H8 Small Dwellings in the Countryside	
Total Number of Representations received	2	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	2	0
Sound	2	0
Complies with Duty to Cooperate	2	0
<b>Summary of Representations</b> Both respondents supported this policy		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/8/H8 <b>ANON-AQTS-32CD-5 - Colden Common Parish Council/5/H8</b>		
<b>Main issues raised in representations received in regulation 19 consultation</b> Support for Policy H8.		

<b>Policy/Evidence base document</b>	H8
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/8/H8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H8
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/5/H8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support this policy
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No



<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.

Local Plan Reference or document	Policy H9 Purpose Built Student Accommodation	
Total Number of Representations received	8	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	5	2
Sound	2	6
Complies with Duty to Cooperate	5	2
<p><b>Summary of Representations</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Finally, two respondents were concerned that criterion v was unclear or unduly restricted the development of PBSA.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/83/H9</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/46/H9</b></p> <p>ANON-AQTS-32U5-8/5/H9</p> <p>ANON-AQTS-323A-J/7/H9</p> <p>ANON-AQTS-32ZJ-2/3/H9</p> <p>BHLF-AQTS-326P-4/8/H9</p> <p>BHLF-AQTS-3284-A/17/H9</p> <p>BHLF-AQTS-328K-1/18/H9</p>		
<p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Whether policy correctly considers the potential loss of open space;</li> </ul>		



- 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.

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/83/H9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/46/H9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	No comment but could not skip through this section
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Church Commissioners for England
<b>Personal reference number</b>	ANON-AQTS-32U5-8
<b>Full reference number</b>	ANON-AQTS-32U5-8/5/H9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy H9 states that, amongst other criteria, the housing needs of students will be supported where “the proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services” (point v). This wording should be amended to provide further clarity.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	This wording should be amended to provide further clarity as follows “the proposal is not on a site allocated for other uses, and where that allocation precludes such uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services” (point v).
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Steven Favell
<b>Personal reference number</b>	ANON-AQTS-323A-J
<b>Full reference number</b>	ANON-AQTS-323A-J/7/H9
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	While the council recognises the contribution students make to the local economy this is mostly to private business and the night time economy. Alongside this there are costs to the community in lack of council tax contributions, disruption and vandalism. There must be an expectation that education establishments provision adequate accommodation for students and there should be no reliance on private landlord HMOs.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	An expectation that establishments provision all of their accommodation requirements and accommodation provision should go hand in hand with any expansion aspirations. All parking requirements for student accommodation should be contained within the development site proposal.
<b>What is your suggested wording or text for the policy?</b>	There is an expectation that education establishments provision all of their accommodation requirements and there is no reliance upon private sector landlords. Expansion proposals shall include matching accommodation proposals. All student parking requirements are to provided within accommodation developments and there will be no entitlement to on street parking permits for such accommodation.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Helen Dawson
<b>Personal reference number</b>	ANON-AQTS-32ZJ-2
<b>Full reference number</b>	ANON-AQTS-32ZJ-2/3/H9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Community Infrastructure Levy should be changed so that purpose built student accommodation falls under its charging structure. These are commercial ventures with high occupancy with a burden on district resources and should contribute to the district.</p> <p>Students should be regarded in the plan as adults who can and will own cars. Policy should be set accordingly reflecting that a failure to provide parking will result in disruption to residents. Evidence of this can be seen in Stanmore and the ruining of the green on Greenhill Road. Consideration should be given to residential streets where the cumulative impact of student accommodation is to squeeze residential streets between purpose built accommodation blocks.</p> <p>For evidence reference, please see extensive objections to student accommodation on Greenhill Road in your planning portal.</p> <p>Distinction should be made between student accommodation built by the university and that of private enterprises.</p> <p>Student accommodation should meet the space standards. Students should not be treated as an underclass living in undersized provision.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Compliance to space standards.</p> <p>Change wording to reflect cumulative impact on ordinary residents</p> <p>Amend CIL to include this type of accommodation.</p> <p>Use evidence base for students owning vehicles and amend policy. Students are adults - telling them they can't have cars and pretending that a commercial landlord is acting in loco parentis should not form part of planning policy.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	



<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Tessa Robertson
<b>Personal reference number</b>	BHLF-AQTS-326P-4
<b>Full reference number</b>	BHLF-AQTS-326P-4/8/H9
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website.</p> <p>In the objections set out in our comments we contend that the current draft of the plan is unsound on the grounds either of being unjustified or ineffective and in some instances not consistent with the draft National Planning Policy Framework 2024 (NPPF).</p> <p>The universities make positive and significant contributions to Winchester, which add to its reputation as a historic centre for education and scholarship. However, the potential impact from such a financially competitive sector as PBSA on a town of Winchester's small size and sensitivity, where a delicate balance needs to be maintained among competing demands, must be carefully managed. If a spatial plan for Winchester Town is prepared it could help in indicating areas that would be suitable for this type of development.</p> <p>The Topic Paper on Student Accommodation refers to the anticipated increase in student numbers with the University of Winchester forecasting an increase over the long term of 3,000 students and Southampton University intending to grow its numbers in Winchester over the next 10 years wanting up to 500 PBSA bed spaces over the next 10 years.</p> <p>The Topic Paper recognises there needs to be control over the siting of PBSA in Winchester. It refers in paragraph 3.13 to the Homes for All consultation in 2021, which agrees there should be greater control over student housing. Also, paragraph 9.67 of Regulation 19 Plan refers specifically to the potential harm if PBSA are built in established residential areas, but this is not addressed in the policy.</p> <p>The Trust considers that Policy H9 is too permissive requiring PBSA only to be within easy walking distance of university facilities without any other criteria. This is too wide as the central area of Winchester is small and all of it is easily walkable by the able-bodied as is demonstrated by existing PBSA already spread across the city (from Winnall to Romsey Road). This policy therefore needs to be re-drafted to set stricter criteria and exclude PBSA from established residential areas.</p> <p>Examples of stronger criteria that could be adopted:</p> <ul style="list-style-type: none"> <li>• Encourage university and other educational bodies to prepare masterplans for approval by the local planning authority to guide accommodation and other university facilities.</li> </ul>

	<ul style="list-style-type: none"> <li>• In the absence of a masterplan, PBSA should normally be on a university campus or possibly adjacent to a campus. The Topic Paper in paragraph 3.14 refers to the 2021 Consultation, concluding that PBSA should be provided on or close to university campuses.</li> <li>• PBSA are unlikely to be acceptable in the middle of established predominantly residential areas but could be acceptable on the edge of such areas.</li> </ul> <p>Other conditions that would be appropriate to control the use of PBSA include:</p> <ul style="list-style-type: none"> <li>• a requirement to include a legal agreement between the developer, university and the local planning authority to restrict occupation to full time students enrolled on courses of one academic year or more.</li> <li>• The University of Winchester has clear policies preventing students from having cars on campus, and to support this policy which is in line with the current direction of travel policies for Winchester, on-site parking should be restricted to disabled, service and operational parking. Such a policy would not prevent short stay loading and unloading of students' possessions but would prevent longer term parking.</li> </ul>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (copy of form - response detailed in letter)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Andy Key
<b>Personal reference number</b>	BHLF-AQTS-3284-A
<b>Full reference number</b>	BHLF-AQTS-3284-A/17/H9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Fails on being effective and consistent with national policy and with the Transport policies in the Plan.</p> <p>“ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by existing / proposed walking, cycling or public transport routes;”</p> <p>This should be “walking, cycling and public transport”. Sustainable transport is about providing as many options as possible. It shouldn’t be acceptable to provide accommodation that (for instance) is accessible only by bus or car, not by bike or foot.</p> <p>“iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel, discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area”</p> <p>This is a self-contradictory policy. “Adequate” car parking provision only encourages private car use. Regulation can be used to limit on-street parking in the surrounding area.</p> <p>To meet the aims of the Transport policies, use of private cars needs to be discouraged.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Fails on being effective and consistent with national policy and with the Transport policies in the Plan.</p> <p>“ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by existing / proposed walking, cycling or public transport routes;”</p> <p>This should be “walking, cycling and public transport”. Sustainable transport is about providing as many options as possible. It shouldn’t be acceptable to provide accommodation that (for instance) is accessible only by bus or car, not by bike or foot.</p> <p>“iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel, discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area”</p> <p>This is a self-contradictory policy. “Adequate” car parking provision only encourages private car use. Regulation can be used to limit on-street parking in the surrounding area.</p> <p>To meet the aims of the Transport policies, use of private cars needs to be discouraged.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>“ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by existing / proposed walking, cycling or and public transport routes;”  “iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel. Car parking provision must be limited – and parking restrictions introduced in the surrounding area if necessary – in order to discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area. Like any other development, student accommodation developments must meet the Transport policies of this Plan.”</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policies)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	H9
<b>Name of respondent (or client)</b>	Winchester College
<b>Personal reference number</b>	BHLF-AQTS-328K-1
<b>Full reference number</b>	BHLF-AQTS-328K-1/18/H9
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Previous Representation made by Winchester College – Regulation 18 consultation</p> <p>Winchester College supports the principle of Policy H9. However, the College requests that the wording of the policy in (v) is amended to enable development on sites protected for open space if it can be demonstrated that no alternative sites are available and any loss of open space is mitigated by qualitative improvements to existing open space e (suggested additional text is underlined): “(v) The proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services, unless it can be demonstrated that no alternative sites are available and the existing use is not required or its loss can be mitigated.”</p> <p>WCC Officer Comments in relation to the Regulation 18 consultation</p> <p>Comments noted:</p> <p>Comments noted. The suggested change to criterion v is not considered appropriate and could weaken the Plan’s protection for open space, employment land, etc. It is possible for the local planning authority to approve an application that departs from policy where other material considerations justify this. An applicant could seek to demonstrate, as part of a planning application, a need for student provision, a lack of alternative sites and mitigation for the loss of open space, etc, but such exceptional circumstances should not be incorporated into the policy. Recommended response: No change</p> <p>Representation made by Winchester College – Regulation 19 consultation</p> <p>As this is the only policy in the plan that is connected to the provision of student accommodation, it is important that the policy is sufficiently flexible to meet the Colleges needs and to ensure that the College retains its position as a prestigious public school for its pupils and parents. The city also benefits from the multiplier effect of the College’s turnover, including expenditure for the College’s staff, pupils and visiting parents. As a leading independent school, the College operates in a highly competitive educational environment. If it is unable to adapt to meet the changing needs of pupils and the requirements of prospective parents, it risks falling behind its competitors and its ability to attract students will be weakened. In order to maintain its position and standards, with all the benefits it brings to the city and the local area, the College needs to ensure the parent and pupil experience meets expectations today and in the future. Therefore, it is</p>

	<p>essential that the policy provides flexibility to provide student accommodation in the right location, subject to demonstrating need and compliance with other policies in the plan.</p> <p>For the avoidance of doubt, the College continues to make its original representation, requesting that the wording of the policy in (v) is amended to enable development on sites protected for open space if it can be demonstrated that no alternative sites are available and any loss of open space is mitigated by qualitative improvements to existing open space (suggested additional text is underlined):</p> <p>“(v) The proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services, unless it can be demonstrated that no alternative sites are available and the existing use is not required or its loss can be mitigated.”</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The College continues to make its original representation, requesting that the wording of the policy in (v) is amended to enable development on sites protected for open space if it can be demonstrated that no alternative sites are available and any loss of open space is mitigated by qualitative improvements to existing open space.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Suggested amendment to criterion v (suggested additional text is underlined):</p> <p>“(v) The proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services, unless it can be demonstrated that no alternative sites are available and the existing use is not required or its loss can be mitigated.”</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policies)</a>  <a href="#">Supporting information (Map - Blackbridge Yard)</a></p>

<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.



<b>Local Plan Reference or document</b>	Policy H10 Houses in Multiple Occupation (HMOs)	
<b>Total Number of Representations received</b>	2	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	1	1
<b>Sound</b>	1	1
<b>Complies with Duty to Cooperate</b>	1	1
<b>Summary of Representations</b> 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.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/70/H10 ANON-AQTS-323A-J/5/H10		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Whether policy adequately safeguards residential amenity.</li> </ul>		

<b>Policy/Evidence base document</b>	H10
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/70/H10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H10
<b>Name of respondent (or client)</b>	Steven Favell
<b>Personal reference number</b>	ANON-AQTS-323A-J
<b>Full reference number</b>	ANON-AQTS-323A-J/5/H10
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	H10 i HMOs should be limited to less than the figures quoted. The proposed figures are unsound. There has been a lack of cooperation between WCC who have been slow to introduce restrictions. The complexity and length of this survey is likely to lead to very low levels of public engagement.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	H10 i HMOs should be limited to less than the figures quoted. 20% in an area is too high. 10% in an area and 15% in a street would be more tolerable. No HMO should be adjacent to another. Universities should be responsible for accommodating the students that they recruit, and not really on local buy to let landlords. High student numbers degrade areas due to the irresponsibility of young adults learning to live away from home for the first time.
<b>What is your suggested wording or text for the policy?</b>	HMOs shall be limited to no more than 10% in an area and no more than 15% on a street. HMOs for students shall provide at least two parking spaces on site and not be eligible for on street parking permits.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

*such as images, tables, or  
tracked changes, if applicable.*

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

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

<b>Local Plan Reference or document</b>	Policy H11 Housing for Essential Rural Workers	
<b>Total Number of Representations received</b>	1	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	1	0
<b>Sound</b>	1	0
<b>Complies with Duty to Cooperate</b>	1	0
<b>Summary of Representations</b> The single comment on this policy is supportive.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/78		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Support for Policy H11.</li> </ul>		

<b>Policy/Evidence base document</b>	H11
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/78/H11
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

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



<b>Local Plan Reference or document</b>	Policy H12 Provision for Gypsies, Travellers and Travelling Showpeople	
<b>Total Number of Representations received</b>	4	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	4	0
<b>Sound</b>	2	2
<b>Complies with Duty to Cooperate</b>	3	1
<p><b>Summary of Representations</b>  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.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  ANON-AQTS-3BSY-T/89/H12  <b>ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council/2/H12</b>  <b>ANON-AQTS-32UK-X - Environment Agency/17/H12</b>  BHLF-AQTS-3284-A/18/H12</p>		
<p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• General support for policy H12; and</li> <li>• Whether the scope for increasing traveller site provision by requiring sites to be provided in conjunction with site allocations has been fully explored.</li> </ul>		

<b>Policy/Evidence base document</b>	H12
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/89/H12
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H12
<b>Name of respondent (or client)</b>	Thoma Light
<b>Personal reference number</b>	ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council
<b>Full reference number</b>	ANON-AQTS-3BQ9-R - Basingstoke and Deane Borough Council/2/H12
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	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.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	H12
<b>Name of respondent (or client)</b>	Anna Rabone
<b>Personal reference number</b>	ANON-AQTS-32UK-X - Environment Agency
<b>Full reference number</b>	ANON-AQTS-32UK-X - Environment Agency/17/H12
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>We are supportive of:</p> <p>a) The inclusion of foul water drainage and wastewater infrastructure details as set out in bullet point v. Government guidance contained within the National Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:</p> <ol style="list-style-type: none"> <li>1. Connection to the public sewer.</li> <li>2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation).</li> <li>3. Septic Tank.</li> </ol> <p>Non-mains drainage may require a permit from the Environment Agency under the Environmental Permitting (England and Wales) Regulations 2016.</p> <p>b) The inclusion of “flood risk” within bullet point vi. to ensure consistency with flood risk policies.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	No modifications necessary.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	H12
<b>Name of respondent (or client)</b>	Andy Key
<b>Personal reference number</b>	BHLF-AQTS-3284-A
<b>Full reference number</b>	BHLF-AQTS-3284-A/18/H12
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Fails on being effective and consistent with national policy. “ii. Sites should be accessible to local services such as schools, health and community services by public transport, on foot or by cycle” Again this should be “... on foot and by cycle” to be consistent with national policy and to ensure developers don’t try to avoid their responsibilities by enabling access to only one form of travel.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	“ii. Sites should be accessible to local services such as schools, health and community services by public transport, on foot or and by cycle”
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (commenting on policies)</a> <a href="#">Letter (commenting on policies)</a>

*such as images, tables, or  
tracked changes, if applicable.*



**WCC Response.**

The keys issues raised in representations on Policy H12 have been addressed in the Gypsy & Traveller Topic Paper, July 2024 (SD10d)

**WCC Recommended Changes arising from representations:**

No changes apart from:

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

<b>Local Plan Reference or document</b>	Policy H13 Safeguarding Traveller Sites	
<b>Total Number of Representations received</b>	1	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	1	0
<b>Sound</b>	1	0
<b>Complies with Duty to Cooperate</b>	1	0
<b>Summary of Representations</b> The single comment on this policy is supportive.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/54/H13		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Support for policy H13.</li> </ul>		

<b>Policy/Evidence base document</b>	H13
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/54/H13
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

Add a footnote to Local Plan policy H13 (pages 251/252) for clarification in the [Proposed Modifications](#).

<b>Local Plan Reference or document</b>	Policy H14 Authorised Traveller Site Intensification	
<b>Total Number of Representations received</b>	1	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	1	0
<b>Sound</b>	1	0
<b>Complies with Duty to Cooperate</b>	1	0
<b>Summary of Representations</b> The single comment on this policy is supportive.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/33		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Support for policy H14.</li> </ul>		

<b>Policy/Evidence base document</b>	H14
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/33/H14
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.

Local Plan Reference or document	Policy H15 Authorised New/Expanded Traveller Sites	
Total Number of Representations received	1	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0
<b>Summary of Representations</b> The single comment on this policy is supportive.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/85/H15		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Support for policy H15.</li> </ul>		



<b>Policy/Evidence base document</b>	H15
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/85/H15
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.

<b>Local Plan Reference or document</b>	Policy H16 The Nurseries, Shedfield	
<b>Total Number of Representations received</b>	1	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	1	0
<b>Sound</b>	1	0
<b>Complies with Duty to Cooperate</b>	1	0
<b>Summary of Representations</b> The single comment on this policy is supportive.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/94/H16		
<b>Main issues raised in representations received in regulation 19 consultation</b> Support for policy H16.		

<b>Policy/Evidence base document</b>	H16
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/94/H16
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.

Local Plan Reference or document	Policy H18 Tynfield, Whiteley	
Total Number of Representations received	1	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0
<b>Summary of Representations</b> The single comment on this policy is supportive.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/36/H18		
<b>Main issues raised in representations received in regulation 19 consultation</b> Support for policy H18.		

<b>Policy/Evidence base document</b>	H18
<b>Name of respondent (or client)</b>	Rob Edgecock
<b>Personal reference number</b>	ANON-AQTS-3BSY-T
<b>Full reference number</b>	ANON-AQTS-3BSY-T/36/H18
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy is well thought-out.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>WCC Response.</b>
Comments noted.
<b>WCC Recommended Changes arising from representations:</b>
None.