

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

### Winchester Site Allocations

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 W1 Barton Farm Major Development Area (Kings Barton)	
Total Number of Representations received.	53	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	20	29
Sound	9	40
Complies with Duty to Cooperate	13	36
<p><b>Summary of Representations</b></p> <p>There were significant concerns over the planned closure of Andover Road, with the overarching theme of traffic management and infrastructure being the main key issue that was raised (87%). The concerns around the closure of Andover Road centre around the increased traffic through residential areas like Kings Barton, raising safety risks for children, air and noise pollution. Leaving Andover Road open is considered to be one way to alleviate traffic congestion, especially given the ongoing developments. There was concern that the current policies are failing to address sustainable development objectives, with 58% expressing a need to align road policies with sustainability principles to enhance infrastructure and public transport services. Additionally, 51% of the feedback stresses the importance of prioritising safety and quality of life, with concerns on pedestrian and cyclist safety in any traffic plans. 43% of comments expressed that they wanted better inclusion of local feedback in decision-making, and legal compliance. Environmental considerations and public health issues were also raised (13%), and the need to improve public health standards through better planning strategies.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/1/W1  ANON-AQTS-3BS3-M/1/W1  ANON-AQTS-3BTN-G/1/W1  ANON-AQTS-3BTR-M/1/W1  ANON-AQTS-3BTB-4/1/W1  ANON-AQTS-3BDF-R/1/W1  ANON-AQTS-3BDC-N/1/W1  ANON-AQTS-3BF8-C/1/W1  ANON-AQTS-3BZ8-Z/1/W1  ANON-AQTS-3BZV-X/1/W1  ANON-AQTS-3BKD-W/1/W1  ANON-AQTS-3BK8-H/1/W1  ANON-AQTS-3BKM-6/1/W1  ANON-AQTS-3BKN-7/1/W1  ANON-AQTS-3BAZ-9/1/W1  ANON-AQTS-3BA2-1/1/W1</p>		

ANON-AQTS-3BAR-1/1/W1

ANON-AQTS-3BDP-2/1/W1

ANON-AQTS-3B1S-J/1/W1

ANON-AQTS-3B1X-Q/1/W1

ANON-AQTS-3BH7-D/1/W1

ANON-AQTS-3BE8-B/1/W1

ANON-AQTS-3BEG-T/1/W1

ANON-AQTS-3BEB-N/1/W1

ANON-AQTS-3B6F-A/1/W1

ANON-AQTS-3B6C-7/1/W1

ANON-AQTS-3BY2-S/1/W1

ANON-AQTS-3BQF-5/1/W1

ANON-AQTS-3BWW-V/1/W1

ANON-AQTS-3BSY-T/2/W1

ANON-AQTS-3BPM-B/1/W1

**ANON-AQTS-3BFT-8 - Crawley Parish Council/1/W1**

ANON-AQTS-3BPB-Z/1/W1

ANON-AQTS-3B4H-A/1/W1

**ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/1/W1**

ANON-AQTS-3BBX-8/1/W1

ANON-AQTS-3299-G/1/W1

ANON-AQTS-32UZ-D/1/W1

**ANON-AQTS-32UK-X - Environment Agency/1/W1**

ANON-AQTS-32SJ-U/1/W1

**ANON-AQTS-327U-A - Southern Water/1/W1**

ANON-AQTS-32T7-9/1/W1

ANON-AQTS-3BX4-T/1/W1

ANON-AQTS-32TG-S/1/W1

ANON-AQTS-32T8-A/1/W1

ANON-AQTS-32FU-S/1/W1

ANON-AQTS-323S-4/1/W1

ANON-AQTS-323H-S/1/W1

BHLF-AQTS-326R-6/1/W1

BHLF-AQTS-326B-P/1/W1

BHLF-AQTS-32YW-E/1/W1

BHLF-AQTS-3284-A/1/W1

**BHLF-AQTS-328R-8 - Hampshire County Council/1/W1**

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

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

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	A Campbell
<b>Personal reference number</b>	BHLF-AQTS-326B-P
<b>Full reference number</b>	BHLF-AQTS-326B-P/1/W1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	I strongly object to the proposed plan to divert Andover Road to go through Kings Barton estate. It makes no sense to divert this main road and take it through a crowded and narrow road. It seems a dangerous and pointless route. Andover Road works very well for all the traffic.
<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>	W1
<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/1/W1
<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 . Para vi only mentions the Winchester District LCWIP. Part of this development is within the Winchester City LCWIP area so this should also be referenced
<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>	"... to the principles as set out in the Winchester Movement Strategy, Hampshire Bus Service Improvement Plan, Winchester City LCWIP and Winchester District LCWIP..."
<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)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Angela Sealey
<b>Personal reference number</b>	ANON-AQTS-3BEB-N
<b>Full reference number</b>	ANON-AQTS-3BEB-N/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I do understand that on a technicality, Winchester City Council has discounted the Kings Barton Residents Association petition asking for Andover Road to be reopened. However, much has changed locally since the decision was made to close it and instead send all traffic coming to Winchester from the north through a new housing estate.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to keep Andover Road open for traffic in the future needs to be included in the design of the Andover Road closure. So that it can be easily reopened as part of any planning approval for further development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development the closure should be designed in such a way that Andover Road can be reopened as part of the permission for the Sir John Moore barracks redevelopment.
<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>	W1
<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/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Paragraph 12.10 should also reference discussion with the Lead Local Flood Authority (LLFA) alongside the Environment Agency. The LLFA are responsible for managing flood risk from groundwater as per the Flood and Water Management Act 2010. We are supportive of the reference to avoiding harmful impacts on water resources, particularly the River Itchen.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Paragraph 12.10 should also reference discussion with the Lead Local Flood Authority (LLFA) alongside the Environment Agency. The LLFA are responsible for managing flood risk from groundwater as per the Flood and Water Management Act 2010. We are supportive of the reference to avoiding harmful impacts on water resources, particularly the River Itchen.
<b>What is your suggested wording or text for the policy?</b>	Paragraph 12.10 should also reference discussion with the Lead Local Flood Authority (LLFA) alongside the Environment Agency. The LLFA are responsible for managing flood risk from groundwater as per the Flood and Water Management Act 2010. We are supportive of the reference to avoiding harmful impacts on water resources, particularly the River Itchen.
<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>	W1
<b>Name of respondent (or client)</b>	C J Schofield
<b>Personal reference number</b>	ANON-AQTS-3BKM-6
<b>Full reference number</b>	ANON-AQTS-3BKM-6/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The proposal to close the Andover Road, diverting traffic via the new Barton Farm estate does not adequately consider the environmental impact. Funneling traffic from one of Winchester's main routes in/out of town via this estate will increase pollution considerably on the estate. This will be especially so during peak times when the necessarily slower speed of traffic will increase exhaust gases. It will also impinge adversely on Barton Farm residents, especially children, exposing them to increased risks from traffic accidents. Any additional mitigating measures will inevitably increase pollution levels. This is an ill thought out measure that will do nothing to aid traffic management and, indeed, will make matters worse. It will impact negatively on people's right to health and to enjoy their environment. The obstacles placed in the way of changes to this policy are pure red tape and the proposed closure of the Andover Road ought to be looked at again and a decision on its closure reversed.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Simply to maintain current traffic arrangements and make considerable savings as a result.
<b>What is your suggested wording or text for the policy?</b>	Policy on closure of Andover Road needs to be deleted in its entirety
<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>	W1
<b>Name of respondent (or client)</b>	Daniel Jenkins
<b>Personal reference number</b>	ANON-AQTS-32FU-S
<b>Full reference number</b>	ANON-AQTS-32FU-S/1/W1
<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 closure of Andover Road and redirection of traffic to the newly planned Winchester Avenue, which will pass near a primary school, raises significant concerns regarding both legal compliance and the soundness of the strategy. It is crucial to re-evaluate this decision in light of the following points:</p> <p><b>Legal Precedent and Public Health Concerns:</b> The tragic case of Ella Kissi-Debrah, a nine-year-old girl whose death was directly linked to air pollution, has set a new precedent in assessing the health impacts of traffic and air quality near schools. The coroner in Ella's case issued a Prevention of Future Deaths Report, explicitly urging local authorities to consider the severe health risks posed by air pollution, especially to children. This legal directive underlines the duty of care that local councils must fulfill to avoid exposing vulnerable populations, such as schoolchildren, to harmful pollutants.</p> <p>The proposed redirection of traffic to Winchester Avenue places a primary school at greater risk of exposure to increased traffic and pollution. According to the Environmental Protection Act 1990 and the Public Health (Control of Disease) Act 1984, local authorities are obligated to minimize public exposure to pollution and safeguard community health. The increased traffic volume adjacent to a school conflicts with these obligations and raises questions about whether the closure of Andover Road has fully considered the latest public health guidance and legal standards.</p> <p><b>Questionable Soundness of the Plan:</b> The National Planning Policy Framework (NPPF) demands that plans are not only positively prepared but also justified, effective, and consistent with national policy. Given that this planning was initially approved prior to the coroner's letter, it is essential to question whether the plan now aligns with current national standards on public health and safety. With evidence suggesting that traffic pollution significantly contributes to respiratory diseases, particularly in children, redirecting traffic closer to a school could contravene national policy on sustainable and health-conscious urban development.</p> <p><b>Compatibility with the NPPF's Soundness Criteria:</b> Positively Prepared:</p>

	<p>The decision appears to conflict with public health priorities, as increased exposure to vehicular emissions near a primary school could have long-term health repercussions. This suggests the plan might not be fully meeting the health needs of the local population.</p> <p>Justified: It is unclear whether alternative routes that minimize health risks to children have been adequately explored. Reassessing whether Andover Road's closure is the best approach in the current context is warranted.</p> <p>Effective: The efficacy of Winchester Avenue in reducing overall traffic congestion, without compromising air quality and safety for children, remains uncertain. Considering the established health risks, the plan could result in unintended consequences that undermine its intended objectives.</p> <p>Consistent with National Policy: The NPPF stresses sustainable development and safeguarding community health, particularly for vulnerable populations. Placing a high-traffic roadway near a school seems inconsistent with these aims, calling into question the closure's alignment with national policy. Reconsideration in Light of the Legal Precedent: It would be prudent for the local authority to re-evaluate the decision under the principles highlighted in Ella Kissi-Debrah's case, which set a legal precedent regarding air pollution and child health. This precedent underscores the importance of local authorities adopting a precautionary approach where children's health is at risk.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Keep Andover Road (B3420) open along with the construction of Winchester Avenue.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>In light of the concerns surrounding air quality, public health, and legal compliance, an alternative strategy would be to keep Andover Road open. This approach would help mitigate the impact of through traffic on both the Kings Barton development and the proposed Winchester Avenue, which has yet to be constructed. Here's how maintaining Andover Road as a throughway could serve as a viable alternative:</p> <p>Reducing Through Traffic in Residential Areas: By allowing Andover Road to remain open, through traffic would have a direct route to bypass Kings Barton, alleviating potential congestion within the development. This would help keep the traffic volume and associated emissions lower in the residential areas, thus reducing the impact on air quality and enhancing the quality of life for residents.</p> <p>Minimizing Exposure to Air Pollution for Schoolchildren:</p>

	<p>With Winchester Avenue planned to run adjacent to a primary school, keeping Andover Road open as a major thoroughfare would decrease traffic near this sensitive area, helping to limit schoolchildren's exposure to air pollution. This aligns with the public health concerns raised following the legal precedent set by the Ella Kissi-Debrah case, emphasizing the need to minimize air pollution near schools and protect vulnerable populations.</p> <p><b>Maintaining Flexibility While Awaiting Winchester Avenue's Construction:</b> As Winchester Avenue is still in the planning stages, keeping Andover Road open would provide an immediate solution that does not rely on the uncertain timeline of new infrastructure projects. Once Winchester Avenue is constructed and its impacts are more thoroughly understood, the council could revisit traffic management options with a clearer view of actual conditions.</p> <p><b>Supporting Sustainable and Balanced Traffic Distribution:</b> By preserving both Andover Road and the future Winchester Avenue, traffic could be more evenly distributed, reducing congestion at peak times. This strategy would contribute to a more sustainable traffic flow while enabling adjustments to minimize air quality impacts across the city. Additionally, by avoiding a concentration of traffic on one route, there could be potential benefits for local air quality and noise levels.</p> <p><b>Promoting Compliance with Environmental and Public Health Obligations:</b> Retaining Andover Road as a through route aligns with the council's duty of care to prevent unnecessary exposure to pollutants, as highlighted in the Environmental Protection Act 1990. This alternative strategy would demonstrate a commitment to meeting legal obligations while addressing the public's health and safety concerns effectively.</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>No</p>

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

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	This is all fine as long as infrastructure upgrades are done comprehensively. Why is there a proposal to close Andover Road.
<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>	W1
<b>Name of respondent (or client)</b>	David Allen Drake
<b>Personal reference number</b>	ANON-AQTS-3BTR-M
<b>Full reference number</b>	ANON-AQTS-3BTR-M/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	No

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	David Baldwin
<b>Personal reference number</b>	ANON-AQTS-3B1S-J
<b>Full reference number</b>	ANON-AQTS-3B1S-J/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed as part of the plan for the development, the closure will be designed in such a way that Andover Road will be re-opened at a suitable time as part of the permission to re-develop 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>	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>	W1
<b>Name of respondent (or client)</b>	E Back
<b>Personal reference number</b>	ANON-AQTS-3BDP-2
<b>Full reference number</b>	ANON-AQTS-3BDP-2/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy W1 is no longer sound or justified and has not been positively prepared, due to the inclusion of policy W2 that proposes the development of the Sir John Moore Barracks site. Policy W1 includes the closure of the existing Andover Road and the rerouting of traffic through the Barton Farm Major Development Area. The planning permission that was previously granted for this did not envisage the addition of up to 1000 new homes to the north on the Sir John Moore Barracks site.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy W1 should be amended to require the existing Andover Road to remain open. This would ensure that new traffic generated by the Sir John Moore Barracks development is not routed through the new Kings Barton estate (the Barton Farm Major Development Area) to the detriment of the health and well-being of people living there.
<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>	No

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

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Geoffrey Fowler
<b>Personal reference number</b>	ANON-AQTS-3BE8-B
<b>Full reference number</b>	ANON-AQTS-3BE8-B/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The decision to divert Andover Road through Barton Farm is a plan fraught with danger and disruption for Barton Farm residents. There will be many young families living on the estate and childrens' lives could be put at risk by vehicles speeding through . Planners know as well as I do that speed limits are ( by and large ) ignored , so how do they propose to keep traffic speeds down to a safe level ? And what are they going to do about traffic noise and pollution ? Ans just how do they propose to feed in traffic from Sir John Moore barracks when that site is developed?
<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>	No

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

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Georgette Miller
<b>Personal reference number</b>	BHLF-AQTS-32YW-E
<b>Full reference number</b>	BHLF-AQTS-32YW-E/1/W1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Safer for children, residents and the public if traffic continues along Andover Road in order to avoid an accident or the worse a death on Winchester Avenue where youngsters play.
<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>	W1
<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/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year. On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.
<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>	W1
<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-32T7-9/1/W1
<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 W1 : Barton Farm Barton Farm is a former allocation that benefits from outline planning permission and several reserved matters. It includes numerous facilities and services as part of the permission. Barton Farm Primary Academy, a 420-place primary academy for children aged 4-11, opened in September 2020. The ongoing allocation continues to commit to the provision of a new local centre, small-scale employment uses, pre school facilities and a Park &amp; Ride.</p> <p>Barton Farm is located approximately 1 kilometre east of my client's land interest at Harestock Road, and some of these facilities will be accessible by non-car modes. Whilst the principle of the ongoing allocation is supported, based on historic delivery rates my client does not consider that the entirety of the allocation will be delivered within the plan period to 2040. Para 12.5 of the Plan states that 'some 1,541 dwellings remained to be developed at April 2023'. The Council anticipates delivery at a rate of 115dpa, as set out within the Authorities Monitoring Report (December 2023), which would equate to 1,840 dwellings to 2040 (16 * 115). However, the site is being progressed by single housebuilder, Cala Homes, and their related affordable partner, Vivid. Delivery has therefore been consistent but relatively low over a number of years, and it is considered a more cautious approach of assuming delivery of 75 dph would be appropriate. This would equate to 1,200 dwellings, a shortfall of some 341 dwellings.</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 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>	W1
<b>Name of respondent (or client)</b>	Helen Stevens
<b>Personal reference number</b>	ANON-AQTS-3BAZ-9
<b>Full reference number</b>	ANON-AQTS-3BAZ-9/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	To close Andover Road and divert traffic through narrow roads in a dense housing estate is a plan for traffic disaster and an increase in pedestrian deaths
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Leave Andover Road open
<b>What is your suggested wording or text for the policy?</b>	No change in traffic using Andover Road so needed
<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>	W1
<b>Name of respondent (or client)</b>	Henrietta Boucher
<b>Personal reference number</b>	ANON-AQTS-3BFT-8 - Crawley Parish Council
<b>Full reference number</b>	ANON-AQTS-3BFT-8 - Crawley Parish Council/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	vii - It appears this policy has not take into account the concerns of many local residents, campaigners and those who use the Andover Road, who have serious concerns about its closure due to, now outmoded, historic planning permissions. The closure of the Andover Road is likely to put additional pressure on other routes into Winchester and increase the level of traffic that runs through the Barton Farm neighbourhood.
<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>	W1
<b>Name of respondent (or client)</b>	Jane Balfour
<b>Personal reference number</b>	BHLF-AQTS-326R-6
<b>Full reference number</b>	BHLF-AQTS-326R-6/1/W1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>I wish to express my strong opposition to your proposal to close Andover Road. I live off Harestock Road and It is already a problem as soon as Winchester By Pass is closed the moment there is a problem on the M3 Winnall Junction southbound. We recently had nightwork which diverted traffic during the night, heavy lorries included, which rumbled along Harestock Road, down Stockbridge Road, along Chilbolton Avenue &amp; up Romsey Road. We are going to become the new Winchester By Pass and the Barton Farm Development was envisaged as a residential area with shops &amp; social space in its centre. Of course none of this has happened. In addition we have the proposed development of the Barracks into another large residential area, thus far Park and Ride ideas are minimal.</p> <p>Andover Road has been a principle artery into Winchester since Roman times and provides far better direct access into the centre than ruining residential areas with pollution and heavy lorries. So I submit my very strong objection to the closure of Andover Road.</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>	W1
<b>Name of respondent (or client)</b>	Jeffrey Robert Greenleaf
<b>Personal reference number</b>	ANON-AQTS-3BKN-7
<b>Full reference number</b>	ANON-AQTS-3BKN-7/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I wish to object to the closure of the Andover Road and the rerouting of traffic through Barton Farm Estate. This is totally unnecessary and will result in delays and accidents to traffic on Barton Farm. Please leave the existing scheme in place with through traffic continuing to use the Andover Road.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The existing scheme using the Andover Road for through traffic works extrememy well. You should continue to use the Andover Road.
<b>What is your suggested wording or text for the policy?</b>	Andover Road will contine to be used as the main road between Three Maids Hill and the city centre.
<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>	W1
<b>Name of respondent (or client)</b>	Jill North
<b>Personal reference number</b>	ANON-AQTS-3BTN-G
<b>Full reference number</b>	ANON-AQTS-3BTN-G/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association disagree with and I am of the same view as them.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	JJ Heath-Caldwell
<b>Personal reference number</b>	ANON-AQTS-3BKD-W
<b>Full reference number</b>	ANON-AQTS-3BKD-W/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	No

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	John Ritchie-Cox
<b>Personal reference number</b>	ANON-AQTS-3BZV-X
<b>Full reference number</b>	ANON-AQTS-3BZV-X/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Juliet Hawkes
<b>Personal reference number</b>	ANON-AQTS-3BK8-H
<b>Full reference number</b>	ANON-AQTS-3BK8-H/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>I have found great difficulty in seeing mapped details of the proposed road through Abbots Barton Development. I support the building of the housing estate, but note only 1/4 of the houses have been built so the newly generated traffic has yet to be reaised. I can find no details of the traffic currently using the Andover Road from the A34 road which takes a significant proportion of traffic entering the city from the north (especially local residents living in the north and west of the city) who strive not to enter through the Winnall Junction for obvious reasons. Even assuming a fraction of the traffic used the eventual 200 space park and ride (yet to be completed) I do not believe this would have a significant effect on the number of vehicles proposed to be re-routed through this housing estate. Looking at the plan issued by the developer to the residents it is not at all clear where the buses will go, let alone the other vehicles. Is it proposed that the buses will continue to use the 4 stops on the Andover Road and there will be no service into the estate itself? This is all far from clear, and I regard it as a major failure of consultation that there was no consultation on this proposal when it was first agreed, and its still unclear what is proposed. I principle I support the development, and the cycle and footpaths proposed, but the idea of closing a major trunk route in order to re-route it through a housing estate seems to me completely unjustifiable.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keeping the Andover Road open - cheaper, more effective for overall traffic movement and kinder to the residents of this only partially complete housing estate.
<b>What is your suggested wording or text for the policy?</b>	The wording of the policy is fine but excludes any assessment of the transport needs of the residents, and if that is included I'd like you to elaborate on how re-routing a major road through the centre of the housing estate is going to conform to this - The development should be designed to meet the housing and transport needs of all sectors of the community, including families, the young and older people to ensure equality and social cohesion;
<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>	W1
<b>Name of respondent (or client)</b>	Keith Cooper
<b>Personal reference number</b>	ANON-AQTS-3B1X-Q
<b>Full reference number</b>	ANON-AQTS-3B1X-Q/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Kevin Meneely
<b>Personal reference number</b>	ANON-AQTS-3BDC-N
<b>Full reference number</b>	ANON-AQTS-3BDC-N/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I believe that the existing Andover Road should remain open to traffic as it seems that this is the view of the majority of local residents. The more routes that we have into and out of our city the better at this helps to ease congestion and traffic flow, especially if there is an incident that blocks one route.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keep Andover Road as it is.
<b>What is your suggested wording or text for the policy?</b>	Keep Andover Road as it is.
<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>	W1
<b>Name of respondent (or client)</b>	Kirstie de Vere
<b>Personal reference number</b>	ANON-AQTS-32T8-A
<b>Full reference number</b>	ANON-AQTS-32T8-A/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I appose the closure of Andover Road. It is not a sensible and safe decision to close a road that was designed to hold a level of traffic with set back properties.Re-diverting traffic through Winchester Ave, is an irresponsible & irrational decision. Ultimately there will be fatalities, a lot of children live on the development. Plus the road is not wide enough to cope with the current volume of traffic. Furthermore, the re-development of St John's Moore, will produce even more traffic and the route will not be able to manage the levels and will ultimately become hugely congested.
<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>	No



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

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Krystyna Kaminski-Cook
<b>Personal reference number</b>	ANON-AQTS-3B6F-A
<b>Full reference number</b>	ANON-AQTS-3B6F-A/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I call on Winchester City Council and Hampshire County Council to RE-OPEN Andover Road as a requirement for the approval of the Sir John Moore Barracks
<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>	I call on Winchester City Council and Hampshire County Council to RE-OPEN Andover Road as a requirement for the approval of 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>	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>	W1
<b>Name of respondent (or client)</b>	Lucrezia Slinn
<b>Personal reference number</b>	ANON-AQTS-3B4H-A
<b>Full reference number</b>	ANON-AQTS-3B4H-A/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Lyn Salisbury
<b>Personal reference number</b>	ANON-AQTS-3BA2-1
<b>Full reference number</b>	ANON-AQTS-3BA2-1/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	It is not a sensible or sound policy to re-route a busy main road artery from the A34 junction into Winchester through a new housing estate. The busy road will pass close to flats and houses, near to where children play, and increase pollution levels and danger from passing vehicles. If Andover Road is kept open it would be logical and sensible and in the interests of the residents of Barton Farm and Harestock. Please let sound policy, sense and sensitivity to local feelings predominate in your plans and judgement
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keep the current roads as they are.
<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>	W1
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/1/W1
<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 W1 : Barton Farm Barton Farm is a former allocation that benefits from outline planning permission and several reserved matters. It includes numerous facilities and services as part of the permission. Barton Farm Primary Academy, a 420-place primary academy for children aged 4-11, opened in September 2020. The ongoing allocation continues to commit to the provision of a new local centre, small-scale employment uses, pre school facilities and a Park &amp; Ride. Barton Farm is located approximately 1 kilometre east of my client's land interest at Harestock Road, and some of these facilities will be accessible by non-car modes. Whilst the principle of the ongoing allocation is supported, based on historic delivery rates my client does not consider that the entirety of the allocation will be delivered within the plan period to 2040. Para 12.5 of the Plan states that 'some 1,541 dwellings remained to be developed at April 2023'. The Council anticipates delivery at a rate of 115dpa, as set out within the Authorities Monitoring Report (December 2023), which would equate to 1,840 dwellings to 2040 (16 * 115). However, the site is being progressed by single housebuilder, Cala Homes, and their related affordable partner, Vivid. Delivery has therefore been consistent but relatively low over a number of years, and it is considered a more cautious approach of assuming delivery of 75 dph would be appropriate. This would equate to 1,200 dwellings, a shortfall of some 341 dwellings. This shortfall could be addressed by including additional allocations, targeted in and around Winchester, of which my client site would represent a suitable site.</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 evidence base re: Land at Harestock Road)</a>

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Martin Abrahams
<b>Personal reference number</b>	ANON-AQTS-3BTB-4
<b>Full reference number</b>	ANON-AQTS-3BTB-4/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The closure of Andover Road is not viable in light of the extended plans for Barton Farm development and Sir John Moore Barracks. The movement of increased traffic into Winchester from the north would all travel through the large housing estate at the speed allowed by the 20MPH limit. This will present a health risk to people living in the Barton Farm estate. It will endanger the lives of children living in the Barton Farm estate. During the work at the M3 junction 9 these dangers will much higher because of the large queues of traffic on the southbound A34 that will ensue. Traffic leaving the A34 at the 3 Maids Hill junction for a shortcut through Winchester will make this situation worse for several years.</p> <p>As there is no sign of a park and ride bus service from Barton Farm being supported by a bus lane into Winchester. Nor is there a proposal to use electric powered busses on this route, one can only imagine the increased level of pollution in the area of the Barton Farm development.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The council should keep open Andover Road, complete the Park and Ride service from the north into Winchester, provide a bus lane into Winchester from the north and add electric powered busses to the Park and Ride service
<b>What is your suggested wording or text for the policy?</b>	The council will keep open Andover Road, complete the Park and Ride service from the north into Winchester, provide a bus lane into Winchester from the north and add electric powered busses to the Park and Ride service.
<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>	W1
<b>Name of respondent (or client)</b>	Matthew Derham
<b>Personal reference number</b>	ANON-AQTS-323H-S
<b>Full reference number</b>	ANON-AQTS-323H-S/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Michael Bickley
<b>Personal reference number</b>	ANON-AQTS-3BY2-S
<b>Full reference number</b>	ANON-AQTS-3BY2-S/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted, on a technicality, the Kings Barton Residents' Association petition asking for Andover Road to be re-opened. There is much in the policy statement with which Kings Barton Residents' Association and I disagree.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned closure of that road. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Michael Coshott
<b>Personal reference number</b>	ANON-AQTS-3BWW-V
<b>Full reference number</b>	ANON-AQTS-3BWW-V/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	There has been significant attempts to engage with the City Council on the Kings Barton development and proposals to close and re-route Andover Road. This includes a petition complete by several thousand residents together with numerous other attempts to engage with the City and County Council. These approaches have, to date, been discounted by the City Council.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The policy notes that Andover Road is one of the, "key radial routes into the city centre". The current proposal to close Andover Road and re-route traffic through residential areas within Kings Barton, Harestock and Weeke should be reconsidered in the context of the wider redevelopment of North Winchester, including the proposal under W2 for redevelopment of Sir John Moore Barracks.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Michael Slinn
<b>Personal reference number</b>	ANON-AQTS-3BS3-M
<b>Full reference number</b>	ANON-AQTS-3BS3-M/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has refused to co-operate with Kings Barton Residents' Association. There is much in the policy statement that Kings Barton Residents' Association disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning permission for Sir John Moore Barracks redevelopment.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	No

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Miho Finch
<b>Personal reference number</b>	ANON-AQTS-3BBX-8
<b>Full reference number</b>	ANON-AQTS-3BBX-8/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Milan Bogunovic
<b>Personal reference number</b>	ANON-AQTS-3BAR-1
<b>Full reference number</b>	ANON-AQTS-3BAR-1/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	While housing is needed there are real concerns around how transport and the diversion of Andover road will effect the quality of the development at Barton Farm especially with the issues relating to increased traffic and roads that are not suitable to the level for travel in such a built up area such as Winchester ave which has no pavements
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Not to divert Andover road through Winchester ave with the increased housing from Sir John Moore barracks
<b>What is your suggested wording or text for the policy?</b>	Keep the Andover road open
<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>	W1
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Throughout the 'Development Allocations Winchester' chapters (page 306 onwards) the Plan includes the narrative highlighting the shortfalls in primary care capacity and the need for developers to liaise with the NHS to establish potential Section 106 contribution requests. Access to GP services is critical to the success of the objectives set out in the Local Plan, it is one of the few services that will be used by all occupants of new housing and their need is immediate. The ICB has reviewed the housing allocation policies and have commented as per Appendix A which has been sent directly to the Planning Policy Team at WCC.</p> <p>The ICB has submitted draft Infrastructure Delivery Plans and is committed to keeping these up to date on a regular basis to ensure that developers will be informed as to the projects and funding that will be required to make their applications acceptable in planning terms.</p> <p>NHS Hampshire and Isle of Wight ICB look forward to working collaboratively with Winchester City Council to deliver the Winchester City Local Plan, ensuring healthcare infrastructure meets the needs of Winchester residents. The ICB supports the current policy statements.</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



**Have you submitted supporting information?**  
*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.*

Yes  
[Letter \(commenting on policies\)](#)

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Mr Paul Hansell
<b>Personal reference number</b>	ANON-AQTS-3BDF-R
<b>Full reference number</b>	ANON-AQTS-3BDF-R/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Diverting the Andover Road from the straight Roman road is plainly ridiculous
<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>	W1
<b>Name of respondent (or client)</b>	Natalie Hogan
<b>Personal reference number</b>	ANON-AQTS-3BH7-D
<b>Full reference number</b>	ANON-AQTS-3BH7-D/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has reportedly found a technicality to discount the Kings Barton Residents' Association petition asking for the discussion around the decision to re-route Andover Road to be re-opened.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The planned closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is planned to be closed to traffic as part of the plan for the development of Kings Barton, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks re-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>	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>	W1
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/1/W1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The planning permission for Kings Barton includes the delivery of a new 200 space Kings Barton P&amp;R light site at the northern end of the site adjacent to Wellhouse Lane, which is to be served by a new local bus service through Kings Barton.</p> <p>The County Council consider that there is potential to link any future Park and Ride service north of the site to connect with this facility which should be cross-referenced in the supporting text for this policy as well as in Policy W2.</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</i>	<p>Yes</p> <p><a href="#">Letter (commenting on policies and evidence base)</a></p>

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

<b>Policy/Evidence base document</b>	W1
<b>Name of respondent (or client)</b>	Paul McCulloch
<b>Personal reference number</b>	ANON-AQTS-3BF8-C
<b>Full reference number</b>	ANON-AQTS-3BF8-C/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Peter Finch
<b>Personal reference number</b>	ANON-AQTS-3BPB-Z
<b>Full reference number</b>	ANON-AQTS-3BPB-Z/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Peter Turner
<b>Personal reference number</b>	ANON-AQTS-32TG-S
<b>Full reference number</b>	ANON-AQTS-32TG-S/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<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/2/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W1
<b>Name of respondent (or client)</b>	Robert Slinn
<b>Personal reference number</b>	ANON-AQTS-3BPM-B
<b>Full reference number</b>	ANON-AQTS-3BPM-B/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>This site allocation is in the locality of the SWS Harestock Treatment Works. As such it may be prudent to include the following policy criterion for Policy W1 to supplement vi. of Policy NE6.</p> <p>The development layout must provide sufficient distance between Harestock Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.</p> <p>Southern Water endeavours to operate its sewage and sludge treatment works efficiently and in accordance with best practice to prevent pollution. However, unpleasant odours inevitably arise as a result of the treatment processes that occur. New development must be adequately separated from WTWs to safeguard the amenity of future occupiers. This is in line with paragraph 191 of the National Planning Policy Framework (NPPF, 2023), which states that 'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on [...] living conditions' and Paragraph 193 which states 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities [...] Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.'</p> <p>In addition, paragraph 7.6.5 of the Kent Waste &amp; Minerals Local Plan 2016 (p106) states that 'certain types of development which require a high quality amenity environment (e.g. residential) may not always be compatible with [...] waste management activities which are industrial in nature.' Policy DM 8 further stipulates ' Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.</p>
<b>What modification(s) are necessary to make the</b>	This site allocation is in the locality of the SWS Harestock Treatment Works. As such it may be prudent to include the following policy criterion for Policy W1 to supplement vi. of Policy NE6.

<p><b>policy legally compliant or sound?</b></p>	<p>The development layout must provide sufficient distance between Harestock Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The development layout must provide sufficient distance between Harestock Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.</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="#">Supporting Document (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	W1
<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/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Barton Farm Major Development Area, and Policy W1 where Section 12.11 sets out "the diversion, re-routing .. and downgrading of Andover Road ..": The access strategy involving the diversion and re-routing of the Andover Road traffic through Barton Farm makes no sense. It is dangerous to have such a volume of traffic, including heavy vehicles, be re-routed through a housing estate. The local area residents plus existing Barton Farm residents simply do not wish this to proceed. It would be 'an accident waiting to happen'. Simply retain Andover Road traffic access AND provide the proposed Park and Ride facility there, PLUS provide better public transport links into Winchester City generally.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Barton Farm Major Development Area, and Policy W1 where Section 12.11 sets out "the diversion, re-routing .. and downgrading of Andover Road ..": The access strategy involving the diversion and re-routing of the Andover Road traffic through Barton Farm makes no sense. It is dangerous to have such a volume of traffic, including heavy vehicles, be re-routed through a housing estate. The local area residents plus existing Barton Farm residents simply do not wish this to proceed. It would be 'an accident waiting to happen'. Simply retain Andover Road traffic access AND provide the proposed Park and Ride facility there, PLUS provide better public transport links into Winchester City generally.
<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>	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>	W1
<b>Name of respondent (or client)</b>	Steve Heath
<b>Personal reference number</b>	ANON-AQTS-3BQF-5
<b>Full reference number</b>	ANON-AQTS-3BQF-5/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>W1 - the Barton Farm development includes the proposed closure to through traffic of the Andover Road. To travel into Winchester from Barton Stacey requires that you travel the A272 (usual route), the Winchester/Christmas Hill road from Sutton Scotney or the A34. Best time is around 20 mins to deliver my son to his work at RHCH. Should there be an issue with the M3 or southern end of the A34 this journey takes 45 minutes as traffic piles off the trunk routes and on to the Andover Road following their satnavs. This situation will deteriorate further when the traffic increases as a result of the Inert Waste Recycling facility and the Electric Car recharging facility go into operation. There is no bus service to the village, most taxi drivers will not accept calls because of distance and known problems with delays, and there is no Park and Ride facility provided when travelling from the North of the City. Closing the Andover Road will only exacerbate the issues with this route, at a time when there are to be major roadworks at the A34/M3 Junction.</p> <p>[please note I have no legal experience and thus no basis to judge legal compliance - but you insisted on an answer]</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Retain the Andover Road as a through route, provide a Park and Ride facility when coming from the North of Winchester and ensure access/egress for the 2 new sites on the A272 are both safe and efficient.
<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>	W1
<b>Name of respondent (or client)</b>	Susan Ramsden
<b>Personal reference number</b>	ANON-AQTS-3BEG-T
<b>Full reference number</b>	ANON-AQTS-3BEG-T/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-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>	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>	W1
<b>Name of respondent (or client)</b>	Suzanne foster
<b>Personal reference number</b>	ANON-AQTS-3B6C-7
<b>Full reference number</b>	ANON-AQTS-3B6C-7/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I think the decision to close Andover Road is wrong
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keep Andover Road open
<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>	W1
<b>Name of respondent (or client)</b>	Tessa Greenhalgh
<b>Personal reference number</b>	ANON-AQTS-323S-4
<b>Full reference number</b>	ANON-AQTS-323S-4/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>12.11 - The downgrading of Andover Road.</p> <p>This plan is not sound because it is not positively prepared nor justified, and it is questionable as to whether it is effective or consistent with national policy. It is not positively prepared or justified. I am unaware of any evidence it meets the area's objectively assessed needs, the main area affected (Kings Barton) not in existence at the time the decision was made. Andover road is the major route from the North into Winchester and could be improved upon for the benefit of pedestrians, cyclists and other users. There is little justification to divert it through a residential area. In fact there are several potential disadvantages in doing so, in addition to cost including</p> <ul style="list-style-type: none"> <li>• the increased casualty risks</li> <li>• the increased severance of the Kings Barton residents' community</li> <li>• the increase in air and noise pollution for residents</li> <li>• the overall increase in travellers' carbon emissions</li> <li>• the increased traffic delays for travellers including Winchester City Council residents</li> <li>• the increased movement of traffic through other residential areas in Winchester to avoid delays on</li> </ul> <p>Winchester Avenue</p> <p>The simplest and most desirable outcome to the majority of residents (as per multiple petitions including one recently of over 3000 signatures) is to leave Andover Road open with appropriate improvements, which is in keeping options within the WSP Andover Road Corridor report of 2023. This plan is unlikely to be effective given that many of the occupancy deadlines have not been met by Cala Homes and the completion of Winchester Avenue is potentially also going to be delayed. With the upcoming M3 junction 9 works, it is imperative that Andover Road be kept open to allow for additional traffic taking alternative routes.</p> <p>National policy in this area suggests a move towards reducing traffic in local areas rather than diverting major roads through residential estates. For example, the Department for Transport 'Public Opinion Survey on Traffic and Road Use' of 2020 suggests the majority support the reduction of traffic in their neighbourhood and subsequently there has been a move towards realising this goal, for example in 'Implementing low traffic neighbourhoods' of 2024.</p>

	The decision to close Andover road to through-traffic was made many years ago, prior to the Kings Barton estate being built. This is now out-of-date and not in keeping with current opinion, local needs or national policy. It should be reversed, which could, for example, be done so as a condition of the development of Sir John Moore Barracks, which will also increase the traffic on Andover Road. As one of many mothers with young children on this estate, scared for her children's health and safety, I implore the council to reconsider this decision.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<ol style="list-style-type: none"> <li>1. Should follow objective needs of local area and be justified through consideration of reasonable alternatives based on evidence</li> <li>2. Should be in keeping with national policies aimed at reduced traffic in residential areas</li> </ol>
<b>What is your suggested wording or text for the policy?</b>	The Andover Road closure will be reconsidered in light of the development plans for Sir John Moore Barracks. Improvements to the road and specific junctions will be undertaken with the aim to keep Andover Road open to all through traffic.
<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>	W1
<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/1/W1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<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> Vistry and Taylor Wimpey do not consider that the 2040 Plan is founded upon a soundly based development strategy that is consistent with the key objectives and priorities that the Council has described as central to its plan-making purpose. Submissions made to the Regulation 18 consultation stage in autumn 2022 included two supporting reports submitted as appendices to the representations, outlining the case in favour of creating a new Northern Neighbourhood for Winchester on land to the north of the Kings Barton MDA, and a SHELAA assessment report explaining why the land is the most appropriate option for future strategic growth at Winchester Town. These submissions remain valid and relevant to the future examination of this plan. They are not re-submitted to this Regulation 19 consultation but may be cited in support of submissions at a future hearings stage.</p> <p>Winchester is undoubtedly an important historic and cultural centre with many valuable assets it is far from unique in this respect with numerous towns and cities across the country also characterised by heritage and cultural assets of great importance. The landscape surrounding Winchester while attractive and rich in places, is varied in terms of its quality. While to the east the National Park is of undoubted significance and beauty, the countryside setting to the north, particularly; to the west, and to the south is not marked out specifically or recognised as being nationally significant. If this was the case, it would be reasonable to expect that nationally significant landscape designations would apply, denoting the importance that the Draft Plan attests.</p> <p>Vistry and Taylor Wimpey are not seeking through these representations to deny that the landscape setting of the town is attractive, or in places possesses important qualities that are worthy of preservation. However, it is important not to overstate the importance, or to confer undue constraint, because this will preclude necessary development from taking place; stifling the growth and change that the Draft Plan asserts is necessary and therefore perpetuating the status quo. The table provided on page 307 illustrates the limited strategic planning ambition for Winchester that is proposed by this plan. Having stated in the evidence base and in the plan that Winchester is the most sustainable settlement in the district (paragraph 9.27), the level of growth</p>

planned for is unduly limited: Most of the growth that is listed is in the form of already committed development, or is simply rolled forward (58%):

- Completions 879
- Outstanding permissions 328
- Barton Farm (W1) 1,541
- Central Winchester Regeneration (W7) 300
- Station Approach (W8) 250

The rolled forward MDA at Barton Farm/Kings Barton the next largest component of housing land supply at Winchester occurs in the form of windfalls (18%), which by their very nature are unplanned. This means that 76% of the dwellings identified as forming the Local Plan housing supply at Winchester are not newly arising, planned developments. Vistry and Taylor Wimpey support the allocation of Kings Barfton and advocate strongly that development to the north of Wellhouse Lane on land they control would provide a compatible, sustainable, and cohesive extension to the existing MDA; the 2040 Plan and any future revisions to the development plan should build upon the opportunity it presents to create a greater sustainable, integrated, northern neighbourhood. In this regard attention is drawn to the 'Winchester Town' and 'Wider Context' plans pp. 308, 309 respectively). These show the 'carried forward' Barton Farm MDA and the Sir John Moore Barracks 'New Site Allocation' on the Winchester Town plan. The Wider Context plan on p.309 allows for these allocations to be appreciated better in the context of the wider setting of the urban area, demonstrating that, when taken together with the land immediately to the north, and contained by the line of the A34, there is an obvious and spatially cohesive major development opportunity that exists at Winchester. The wider context plan shows quite clearly that the urban area has expanded historically to the east beyond the floodplain of the river Itchen up to the line of the M3/A34 that extends northwards from junction 9. The road infrastructure functions as an obvious containment barrier delimiting the potential future extent of the urban area.

A future spatial strategy should be based on a comprehensively planned strategic growth at north Winchester. Policy W1 includes a range of criteria that could readily be applied to an allocation of the land to the north of Wellhouse Lane. The design coding and reserved matters approvals that govern the delivery of the Barton Farm site were approved by the local planning authority and therefore can be assumed to meet this principal criterion of the policy. There is no reason why a carefully crafted policy allocating the land to the north, similarly as an MDA, could not achieve development of equal quality, but with provisions tailored specifically to meet the current challenges faced by the Council in combatting climate change. Barton Farm serves as a blueprint for what could be achieved on the land to the north of Wellhouse Lane, in respect of which the Council could exert full policy control if the opportunity to allocate the site is taken.

**What modification(s) are necessary to make the**

**This comment has been summarised – see supporting information for full response**

**policy legally compliant or sound?**

The representations submitted in response to the 2040 Local Plan consultation should be read together and treated as overarching commentary on the strategy of the Plan. Vistry and Taylor Wimpey do not consider that the 2040 Plan is founded upon a soundly based development strategy that is consistent with the key objectives and priorities that the Council has described as central to its plan-making purpose. Chapter 12 of the plan sets out the development allocation policies relating to Winchester. Submissions made to the Regulation 18 consultation stage in autumn 2022 included two supporting reports submitted as appendices to the representations, outlining the case in favour of creating a new Northern Neighbourhood for Winchester on land to the north of the Kings Barton MDA, and a SHELAA assessment report explaining why the land is the most appropriate option for future strategic growth at Winchester Town. These submissions remain valid and relevant to the future examination of this plan. They are not re-submitted to this Regulation 19 consultation but may be cited in support of submissions at a future hearings stage.

#### Development Allocations - Winchester

The supporting introductory text at paragraph 12.2 characterises Winchester as a unique place (a description that could be applied to any town or city in the country) which benefits from a series of exceptional characteristics in terms of historical and cultural value, set within some of the most beautiful landscape in the country. As noted elsewhere in these submissions, while Winchester is undoubtedly an important historic and cultural centre with many valuable assets it is far from unique in this respect with numerous towns and cities across the country also characterised by heritage and cultural assets of great importance. This is not to undermine the quality of the place, but to recognise that there are other towns and cities that must also balance the desire to conserve and protect against the need to flourish and grow, to accommodate contemporary needs socially, culturally, and economically. The landscape surrounding Winchester while attractive and rich in places, is varied in terms of its quality.

Vistry and Taylor Wimpey are not seeking through these representations to deny that the landscape setting of the town is attractive, or in places possesses important qualities that are worthy of preservation. However, it is important not to overstate the importance, or to confer undue constraint, because this will preclude necessary development from taking place; stifling the growth and change that the Draft Plan asserts is necessary and therefore perpetuating the status quo. The table provided on page 307 illustrates the limited strategic planning ambition for Winchester that is proposed by this plan. Having stated in the evidence base and in the plan that Winchester is the most sustainable settlement in the district (paragraph 9.27), the level of growth planned for is unduly limited: Most of the growth that is listed is in the form of already committed development, or is simply rolled forward (58%):

- Completions 879
- Outstanding permissions 328
- Barton Farm (W1) 1,541
- Central Winchester Regeneration (W7) 300

The rolled forward MDA at Barton Farm/Kings Barton the next largest component of housing land supply at Winchester occurs in the form of windfalls (18%), which by their very nature are unplanned. This means that 76% of the dwellings identified as forming the Local Plan housing supply at Winchester are not newly arising, planned developments. This demonstrates that the 2040 plan is lacking both the ambition and positive intent to address the key strategic challenges that the document claims are of critical importance to the Council.

Vistry and Taylor Wimpey support the allocation of Kings Barton and advocate strongly that development to the north of Wellhouse Lane on land they control would provide a compatible, sustainable, and cohesive extension to the existing MDA; the 2040 Plan and any future revisions to the development plan should build upon the opportunity it presents to create a greater sustainable, integrated, northern neighbourhood, the case in favour of which was advanced at Regulation 18 stage on behalf of Vistry and Taylor Wimpey (see above). In this regard attention is drawn to the 'Winchester Town' and 'Wider Context' plans pp. 308, 309 respectively). These show the 'carried forward' Barton Farm MDA and the Sir John Moore Barracks 'New Site Allocation' on the Winchester Town plan. The Wider Context plan on p.309 allows for these allocations to be appreciated better in the context of the wider setting of the urban area, demonstrating that, when taken together with the land controlled by Vistry and Taylor Wimpey immediately to the north, and contained by the line of the A34, there is an obvious and spatially cohesive major development opportunity that exists at Winchester. The wider context plan shows quite clearly that the urban area has expanded historically to the east beyond the floodplain of the river Itchen up to the line of the M3/A34 that extends northwards from junction 9. The road infrastructure functions as an obvious containment barrier delimiting the potential future extent of the urban area. Embracing this opportunity would allow the Council to positively address many of the challenges that it identifies within the 2040 plan through visionary, long term strategic planning of the town. This plan has not taken up this opportunity. A future spatial strategy prepared in accordance with the objectives of the new NPPF should be based on a long-term development strategy that positively embraces comprehensively planned strategic growth at north Winchester.

Policy W1 includes a range of criteria that could readily be applied to an allocation of the land to the north of Wellhouse Lane, notably the requirement (i) to create: A distinctive, well-integrated suburb of Winchester Town, which respects its local context, and enhances the standards of sustainable design in the locality. The design coding and reserved matters approvals that govern the delivery of the Barton Farm site were approved by the local planning authority and therefore can be assumed to meet this principal criterion of the policy. There is no reason why a carefully crafted policy allocating the land to the north, similarly as an MDA, could not achieve development of equal quality, but with provisions tailored specifically to meet the current challenges faced by the Council in combatting climate change. Barton Farm serves as a blueprint for what



	could be achieved on the land to the north of Wellhouse Lane, in respect of which the Council could exert full policy control if the opportunity to allocate the site is taken.
<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>	W1
<b>Name of respondent (or client)</b>	W A Atherton
<b>Personal reference number</b>	ANON-AQTS-3BZ8-Z
<b>Full reference number</b>	ANON-AQTS-3BZ8-Z/1/W1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Ref page 312, paragraph vii of Policy W1; 'mitigate the traffic impacts of the proposed development on the strategic and local road networks should be included and funded by the development...' The very opposite of this will result from the closure of Andover Road, which is a strategic road. Traffic is to be routed through the new Winchester Avenue, which is a local road. And traffic will be increased along Harestock Road and probably Priors Dean Road (local roads) and Stockbridge Road (strategic road). The proposal to close Andover Road is against common sense which would expect traffic to be diverted away from local roads (as in Oxford where rat runs have been closed).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keep Andover road open to all traffic as a strategic road into Winchester from the north.
<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.</i>	No

*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:**

No changes apart from:

[Proposed modification](#) agreed with the Environment Agency in relation to paragraph 12.10.

Local Plan Reference or document	Policy W2 Sir John Moore Barracks		
Total Number of Representations received.			66
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>	
Legally Compliant	28	32	
Sound	9	52	
Complies with Duty to Cooperate	29	31	
<p><b>Summary of Representations</b></p> <p>There were significant concerns regarding the proposed redevelopment of this site which were linked with the planned closure of Andover Road. The closure of the Andover Road is expected to redirect traffic through residential areas like Kings Barton and Abbots Barton, and the concerns raised say this will lead to increased congestion, emissions, and safety risks and that the redevelopment of Sir John Moore Barracks would exacerbate traffic challenges if Andover Road is closed as part of the Kings Barton development. Although the redevelopment of the SJM Barracks site includes a Park and Ride facility which promises some relief, current public transport options are deemed to be inadequate. There is a 3,200-signature petition urging the council to reconsider their planning approach towards the closure of Andover Road.</p> <p>Environmental concerns about the redevelopment of the site for residential development focus on the potential impact on local biodiversity, the plans to designate northern fields as a candidate SINC and the need for comprehensive ecological assessment.</p> <p>Concerns were also expressed about the emphasis on housing over the need for recreational facilities, school places and the need for greater alignment with community needs and national policies.</p> <p>Respondents expressed concerns about the engagement process, unmet need allowance that places undue pressure on the SJM Barracks site, disagreement between representators about whether the whole site is previously developed land, policy guidance/process that is being followed for the Concept Masterplan, lack of information regarding the delivery of the P&amp;R facility and the description of the P&amp;R.</p> <p>Overall, it is considered that there is a need for an integrated approach to development on the site that respects both environmental and heritage values.</p>			
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/2/W2</p> <p>ANON-AQTS-3BS3-M/2/W2</p> <p>ANON-AQTS-3BTN-G/2/W2</p> <p>ANON-AQTS-3BTR-M/2/W2</p> <p>ANON-AQTS-3BDF-R/2/W2</p>			

ANON-AQTS-3BF8-C/2/W2

ANON-AQTS-3BFP-4/1/W2

ANON-AQTS-3BZV-X/2/W2

ANON-AQTS-3BZH-G/1/W2

ANON-AQTS-3BKD-W/2/W2

ANON-AQTS-3BK8-H/2/W2

ANON-AQTS-3BA1-Z/1/W2

ANON-AQTS-3BAT-3/1/W2

ANON-AQTS-3BAR-1/2/W2

ANON-AQTS-3BDP-2/3/W2

ANON-AQTS-3B1S-J/2/W2

ANON-AQTS-3B1X-Q/2/W2

ANON-AQTS-3B17-P/1/W2

ANON-AQTS-3BH1-7/1/W2

ANON-AQTS-3BH7-D/2/W2

ANON-AQTS-3BEG-T/2/W2

ANON-AQTS-3BEB-N/2/W2

ANON-AQTS-3B6F-A/2/W2

ANON-AQTS-3BY2-S/2/W2

ANON-AQTS-3B87-W/1/W2

ANON-AQTS-3BQF-5/2/W2

**ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/8/W2**

ANON-AQTS-3BWW-V/2/W2

ANON-AQTS-3BSY-T/12/W2

ANON-AQTS-3BP2-G/1/W2

ANON-AQTS-3BPM-B/2/W2

ANON-AQTS-3BP5-K/1/W2

**ANON-AQTS-3BFT-8 - Crawley Parish Council/2/W2**

ANON-AQTS-3BPB-Z/2/W2

ANON-AQTS-3B4H-A/2/W2

**ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/6/W2**

ANON-AQTS-3BBX-8/2/W2

ANON-AQTS-32GC-8/2/W2

ANON-AQTS-3299-G/3/W2

ANON-AQTS-32GN-K/1/W2

ANON-AQTS-32UZ-D/2/W2

**ANON-AQTS-32UK-X - Environment Agency/4/W2**

ANON-AQTS-32N9-5/1/W2

ANON-AQTS-32N5-1/1/W2

ANON-AQTS-329Q-8/5/W2

ANON-AQTS-32SJ-U/2/W2

**ANON-AQTS-327U-A - Southern Water/8/W2**

ANON-AQTS-32T7-9/2/W2

ANON-AQTS-3BX4-T/2/W2

ANON-AQTS-32TG-S/2/W2

**ANON-AQTS-32SB-K - Defence Infrastructure Organisation/2/W2**

ANON-AQTS-32FU-S/2/W2

ANON-AQTS-323S-4/2/W2

ANON-AQTS-323H-S/2/W2

ANON-AQTS-32M1-V/1/W2

ANON-AQTS-32ZS-B/2/W2

ANON-AQTS-32DP-J/1/W2

ANON-AQTS-3B8M-K/2/W2

BHLF-AQTS-326J-X/1/W2

**BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/1/W2**

**BHLF-AQTS-3282-8 - Natural England/3/W2**

BHLF-AQTS-328V-C/1/W2

BHLF-AQTS-3284-A/3/W2

BHLF-AQTS-328M-3/1/W2

**BHLF-AQTS-328R-8 - Hampshire County Council/5/W2**

BHLF-AQTS-32QQ-Z/2/W2

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

- There were significant concerns regarding the proposed redevelopment of the site which were linked with the planned closure of Andover Road;

- This closure of the Andover Road is expected to redirect traffic through residential areas like Kings Barton and Abbots Barton, leading to increased congestion, emissions, and safety risks;
- The redevelopment of Sir John Moore Barracks would exacerbate traffic challenges if Andover Road is closed as part of the Kings Barton development;
- Details about the P&R and the delivery of this; and
- Environmental concerns about the redevelopment of the site for residential development focus on the potential impact on local biodiversity and plans to designate northern fields as a candidate SIN.



<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Amanda Abbott
<b>Personal reference number</b>	ANON-AQTS-3BAT-3
<b>Full reference number</b>	ANON-AQTS-3BAT-3/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy via, states access off Andover Road. If the plan to close Andover Road takes place this would not be viable. Andover Road MUST stay open as an access route for all into the city centre - as it currently is.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keep Andover Road open to all traffic into the city centre - as it is now.
<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>	W2
<b>Name of respondent (or client)</b>	Andrew Craig
<b>Personal reference number</b>	ANON-AQTS-32ZS-B
<b>Full reference number</b>	ANON-AQTS-32ZS-B/2/W2
<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 proposed policy W2 for the Sir John Moore Barracks site is not sound as it does not take account of the evidence base prepared for the Local Plan, including specifically the Open Space Assessment 2022. The Open Space Assessment 2022 documents that the Winchester Town area has a large deficit of sports grounds, parks and recreation grounds.</p> <p>Specifically, the Winchester Town ward adjacent to the site covered by policy W2, St Barnabas, has a shortfall of recreational open space totalling 9.7 hectares (5 hectares of sports grounds and 4.7 hectares of parks and recreation grounds) when assessed against the existing Local Plan policy CP7. The current masterplan for the Sir John Moore Barracks site (currently out for public consultation) - will remove one of the existing sports grounds included in the Open Space Assessment 2022, on Harestock Road (which is supposedly protected under existing Local Plan policy DM5), increasing the deficit by a further 1.1 hectare. Consistent with policy W2, the current masterplan for Sir John Moore Barracks proposes the creation of 850 new homes, and assuming a population of 2.4 people per home, would result in a projected population increase of 2040. It proposes retaining 1.9 hectares of the existing Army sports grounds on the site. When the associated loss of the Harestock Road playing pitch is considered, this results in a net gain of just 0.8 hectares across the site itself and the adjacent St Barnabas Ward.</p> <p>However, a population of 2040 people would require 2.448 hectares of playing pitches within 3.264 hectares of land for outdoor sports according to the Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020), and they would require 3.06 hectares of parks, sports and recreation grounds of which 1.53 hectares is for outdoor sport according to the weaker standards set out in Regulation 19 Local Plan policy NE3. The Sir John Moore Barracks masterplan will therefore result in a shortfall of -0.73 ha relative to the Regulation 19 Local Plan standards for outdoor sport, and -1.648 ha relative to FIT guidelines for playing pitches and -2.464 ha relative to FIT guidelines for all outdoor sport. The existing sports playing fields and facilities at this site would represent a significant opportunity for Winchester city to recover some of the facility deficit already identified in the Open Space Assessment 2022, as well as addressing the opportunity to create</p>

	<p>a significant sporting facility in the North of the city, which would also have the effect of reducing many thousands of cross city journeys from new and existing residential areas.</p> <p>Policy W2 must require more of the Sir John Moore Barracks site with respect to its sporting facilities and playing pitch provision to be retained, to avoid worsening the already dire situation documented in the Local Plan evidence base and specifically the Open Space Assessment 2022.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The proposed policy W2 for the Sir John Moore Barracks site is not sound as it does not take account of the evidence base prepared for the Local Plan, including specifically the Open Space Assessment 2022. The Open Space Assessment 2022 documents that the Winchester Town area has a large deficit of sports grounds, parks and recreation grounds. Specifically, the Winchester Town ward adjacent to the site covered by policy W2, St Barnabas, has a shortfall of recreational open space totalling 9.7 hectares (5 hectares of sports grounds and 4.7 hectares of parks and recreation grounds) when assessed against the existing Local Plan policy CP7. The current masterplan for the Sir John Moore Barracks site (currently out for public consultation) - will remove one of the existing sports grounds included in the Open Space Assessment 2022, on Harestock Road (which is supposedly protected under existing Local Plan policy DM5), increasing the deficit by a further 1.1 hectare.</p> <p>Consistent with policy W2, the current masterplan for Sir John Moore Barracks proposes the creation of 850 new homes, and assuming a population of 2.4 people per home, would result in a projected population increase of 2040. It proposes retaining 1.9 hectares of the existing Army sports grounds on the site. When the associated loss of the Harestock Road playing pitch is considered, this results in a net gain of just 0.8 hectares across the site itself and the adjacent St Barnabas Ward. However, a population of 2040 people would require 2.448 hectares of playing pitches within 3.264 hectares of land for outdoor sports according to the Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020), and they would require 3.06 hectares of parks, sports and recreation grounds of which 1.53 hectares is for outdoor sport according to the weaker standards set out in Regulation 19 Local Plan policy NE3. The Sir John Moore Barracks masterplan will therefore result in a shortfall of -0.73 ha relative to the Regulation 19 Local Plan standards for outdoor sport, and -1.648 ha relative to FIT guidelines for playing pitches and -2.464 ha relative to FIT guidelines for all outdoor sport.</p> <p>The existing sports playing fields and facilities at this site would represent a significant opportunity for Winchester city to recover some of the facility deficit already identified in the Open Space Assessment 2022, as well as addressing the opportunity to create a significant sporting facility in the North of the city, which would also have the effect of reducing many thousands of cross city journeys from new and existing residential areas. Policy W2 must require more of the Sir John Moore Barracks site with respect to its sporting facilities and playing pitch provision to be retained, to avoid worsening the already dire situation documented in the Local Plan evidence base and specifically the Open Space Assessment 2022.</p>

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Add a further bullet to paragraph 12.27, as follows:  Consider and address the requirement for sports ground provision to meet the needs of the development and to reduce the shortfall of sports grounds across the adjacent Wards of St Barnabas and Littleton that is documented in the Winchester Open Space Assessment 2022.</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>	W2
<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/3/W2
<b>Legally compliant?</b>	No
<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.</p> <p>Para vii should make it clear that “access” here refers only to motor vehicle access. It is expected that there will be multiple pedestrian, cycling and wheeling access points to fulfil the requirements of para viii.</p> <p>It is also ambiguous: it does not state that the only motor vehicle access should be off Andover Road, which is presumably what was intended. Para viii fails to mention either the District LCWIP or the City LCWIP, both of which are relevant to this area, which falls on the boundary between the two and can deliver key links for both.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend paras vii and viii.
<b>What is your suggested wording or text for the policy?</b>	“vii. The sole motor vehicle access point (aside from emergency vehicles) should be off Andover Road; viii. Include direct, safe and lit, active travel links as part of a strategy that minimises car journeys from the development. High quality facilities for walking, cycling and wheeling and public transport that is connected to the surrounding area/PROW/cycle network in accordance with the Winchester City LCWIP, Winchester District LCWIP, Hampshire Movement and Place Framework and Healthy Streets approach;”
<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 (commenting on policies)</a></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>	W2
<b>Name of respondent (or client)</b>	Angela Sealey
<b>Personal reference number</b>	ANON-AQTS-3BEB-N
<b>Full reference number</b>	ANON-AQTS-3BEB-N/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester. The petition has been handed to Winchester City Council and Hampshire County Council and needs to be taken into account in the preparation of the local plan. The petition has 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	I and many other local people call on Winchester City Council to reopen or keep open and over road to traffic as a requirement for the approval of the John Moore Barack or any other redevelopment in north Winchester
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks development requires the agreement of all parties concerned to reopen or keep open and over road to traffic before any dwellings constructed on the redevelopment site are occupied
<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>	W2
<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/4/W2
<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 note the inclusion of specific reference to the winterbourne (in basic terms this means a river which only flows when groundwater is high) which crosses the site, which we are supportive of (point xii). Given the areas of flood risk and the presence of the winterbourne, we would welcome the opportunity to be involved in any masterplanning discussions. Winterbournes are naturally variable in flow (in a dry year some sections might not flow at all, and in a wet year they may flow almost all year round), but they are biodiverse in nature, and these elements will need to be carefully considered as part of the masterplanning.</p> <p>We are supportive of point xx. regarding phasing of the development to align with the delivery of sewage infrastructure.</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
<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>	W2
<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-8/5/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than Sir John Moore Barracks (refer to Appendix F, pages 624-626) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026). Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Sir John Moore Barracks (refer to Appendix F, pages 624-626) in terms of sustainability (refer to Appendix F, pages 1033-1035). We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than Sir John Moore Barracks (refer to Appendix F, pages 624-626) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026). Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Sir John Moore Barracks (refer to Appendix F, pages 624-626) in terms of sustainability (refer to Appendix F, pages 1033-1035). We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100.
<b>What is your suggested wording or text for the policy?</b>	It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores better than Sir John Moore Barracks (refer to Appendix F, pages 624-626) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026). Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also outperforms the Sir John Moore Barracks (refer to Appendix F, pages 624-626) in terms of sustainability (refer to Appendix F, pages 1033-1035). We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100.

<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>	W2
<b>Name of respondent (or client)</b>	Brian Middleton
<b>Personal reference number</b>	ANON-AQTS-3BP5-K
<b>Full reference number</b>	ANON-AQTS-3BP5-K/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	12.23 Planning Inspectors over the years have consistently supported the northern part of the site as Countryside. It is my opinion and that of the Littleton & Harestock Parish Council, that the Countryside designation should remain and that the northern 26 Ha should be designated as a SINC extending and joining the existing SINC site on the eastern boundary. The Hampshire & IoW Wildlife Trust has written to the Littleton and Harestock Parish Council supporting the idea of the northern area as a wildlife sanctuary. The DIO support the idea of some sort of designated 'countryside' area in the northern site but are proposing to include some housing and urbanisation which rather defeats the purpose of an area devoted to flora and fauna.
<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 northern 26 Ha will continue to be designated as unbuilt Countryside devoted to chalkland flora and fauna.
<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>	W2
<b>Name of respondent (or client)</b>	Brian Middleton
<b>Personal reference number</b>	ANON-AQTS-3BP2-G
<b>Full reference number</b>	ANON-AQTS-3BP2-G/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>I wish to respectfully draw the Inspector's attention to two documents that I have written relevant to the draft Local Plan review namely:-</p> <ol style="list-style-type: none"> <li>1. A History of Flowerdown Camp from 1912 to 2020 Reference: Hampshire Record Office 11A20/1</li> <li>2. Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview <a href="https://lhpc.org.uk/wp-content/uploads/2021/10/Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview-.pdf">https://lhpc.org.uk/wp-content/uploads/2021/10/Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview-.pdf</a></li> </ol> <p>The latter document is a summary of the Chalkland Ecology, Flooding, current Planning Status and Military History of Flowerdown</p> <p>My main points are that:-</p> <ol style="list-style-type: none"> <li>a) The distinguished military history of the Flowerdown site is an important consideration especially its role during WW2 intercepting Enigma encoded messages from enemy forces and forwarding them to Bletchley Park for decoding. A modification to the draft Local Plan should acknowledge this and require that any development of the SJM site should require that the extensive and nationally important heritage be recognised in some way.</li> <li>b) The second document to which I refer is my opinion on the physical attributes of the site and its ecological and physical footprint.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>I wish to respectfully draw the Inspector's attention to two documents that I have written relevant to the draft Local Plan review namely:-</p> <ol style="list-style-type: none"> <li>1. A History of Flowerdown Camp from 1912 to 2020 Reference: Hampshire Record Office 11A20/1</li> <li>2. Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview <a href="https://lhpc.org.uk/wp-content/uploads/2021/10/Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview-.pdf">https://lhpc.org.uk/wp-content/uploads/2021/10/Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview-.pdf</a></li> </ol> <p>The latter document is a summary of the Chalkland Ecology, Flooding, current Planning Status and Military History of Flowerdown</p> <p>My main points are that:-</p> <ol style="list-style-type: none"> <li>a) The distinguished military history of the Flowerdown site is an important consideration especially its role during WW2 intercepting Enigma encoded messages from enemy forces and forwarding them to</li> </ol>

	<p>Bletchley Park for decoding. A modification to the draft Local Plan should acknowledge this and require that any development of the SJM site should require that the extensive and nationally important heritage be recognised in some way.</p> <p>b) The second document to which I refer is my opinion on the physical attributes of the site and its ecological and physical footprint.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>That it should be amended to include the below: I wish to respectfully draw the Inspector's attention to two documents that I have written relevant to the draft Local Plan review namely:-</p> <ol style="list-style-type: none"> <li>1. A History of Flowerdown Camp from 1912 to 2020 Reference: Hampshire Record Office 11A20/1</li> <li>2. Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview <a href="https://lhpc.org.uk/wp-content/uploads/2021/10/Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview-.pdf">https://lhpc.org.uk/wp-content/uploads/2021/10/Flowerdown-Sir-John-Moore-Barracks-A-Planning-Overview-.pdf</a></li> </ol> <p>The latter document is a summary of the Chalkland Ecology, Flooding, current Planning Status and Military History of Flowerdown</p> <p>My main points are that:-</p> <p>a) The distinguished military history of the Flowerdown site is an important consideration especially its role during WW2 intercepting Enigma encoded messages from enemy forces and forwarding them to Bletchley Park for decoding. A modification to the draft Local Plan should acknowledge this and require that any development of the SJM site should require that the extensive and nationally important heritage be recognised in some way.</p> <p>b) The second document to which I refer is my opinion on the physical attributes of the site and its ecological and physical footprint.</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>	W2
<b>Name of respondent (or client)</b>	Chris Leitzell
<b>Personal reference number</b>	ANON-AQTS-3B17-P
<b>Full reference number</b>	ANON-AQTS-3B17-P/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>I have two comments. The first (a) concerns the development specifically and the second (b) relates to the wider developments happening/possibly happening in the vicinity of SJM Barracks. 12.26 is probably the most relevant section for these comments. With respect to:</p> <p>a) The Northern fields of the site should not be developed in any way. They should be left alone and left natural. These fields are not actually brown field, despite their categorisation as such, and are the home of much local wildlife and vegetation. It has been this way for many many years with minimal intrusion by anyone, including the MOD, and so both wildlife and vegetation are well established. The Northern Fields should be minimally developed (Even footpaths through them should be minimised) so that the current wildlife is not disturbed. This approach aligns with the thinking of the majority of the local community and with Littleton &amp; Harestock Parish Council. It also aligns with all local approaches with respect to the Littleton local settlement gap, the need to protect open spaces and with Hampshire/Winchester Biodiversity policy. Moreover, that part of the site is presently be considered as a candidate SINC.</p> <p>b) Please consider the Council produced Map, found here:  <a href="https://winch.maps.arcgis.com/apps/webappviewer/index.html?id=4c4379c8d2c14f8c81033b4ffd1d4a3b">https://winch.maps.arcgis.com/apps/webappviewer/index.html?id=4c4379c8d2c14f8c81033b4ffd1d4a3b</a>  Please select "Brownfield Register 2023" &amp; "SHELAA Sites 2021" &amp; "New Shortlisted Sites" &amp; "Carried Forward Sites". Then zoom in quite closely top SJM Barracks until the SHELAA mapping is visible. It is violet.</p> <p>On the map it can be seen that there are a number of areas around SJM Barracks that are listed for potential developments. If these, and the SJM Barracks development are all progressed then there is substantial housing development happening around Littleton and North Winchester and Littleton will no longer be a village community on the outskirts of Winchester surrounded by open and wild spaces. It will become a suburb of Winchester, rather like Weeke. It should also be noted that that map does not illustrate the ecologically friendly developments presently under way at Three Maids Hill and across the A34 at the old Motocross site (i.e. the solar farm, the anaerobic digestion plant and the EV charging super hub. The people moving into these new homes will need places to work as well as live. Ideally they could walk or cycle to their work, rather than drive and will need to have ready access to green spaces.</p>



	<p>In light of these other potential developments and the development of a Northern Park &amp; Ride (which will provide ready access to the Barracks), it would make incredible sense to focus the redevelopment of SJM Barracks so that it is a hub for employment instead of new homes.</p> <p>I would like to suggest that the site should either be a science park, or the headquarter for a major employer (rather like IBM at Hursley, Vodafone at Newbury or Microsoft/Oracle at Reading). Another alternative might be a large public sector employer. So it could be a hospital or even a redevelopment of local schools/colleges (e.g. Peter Symonds, Henry Beaufort). Possibly a large government department looking to relocate from London.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The W2 part of the policy should take account of the wider development and transport planning that is under way for the North of Winchester and in particular the SHELAA planning for the areas around SJM. The redevelopment of SJM Barracks is a one off opportunity and it provides the Council with a chance to demonstrate and showcase the way employment, housing, transport, wildlife/nature and leisure can all be ergonomically, sustainably and effectively linked together in a holistic way.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>There should be a rethink about W2 and the way the site is to be used. It should not just be used for development of new homes. In the light of the further developments that will occur (as illustrated by the SHELAA plan) the entire wording of this section needs adjustment.</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>	W2
<b>Name of respondent (or client)</b>	Chris Leitzell
<b>Personal reference number</b>	ANON-AQTS-3BH1-7
<b>Full reference number</b>	ANON-AQTS-3BH1-7/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>I have two comments. The first (a) concerns the development specifically and the second (b) relates to the wider developments happening/possibly happening in the vicinity of SJM Barracks. 12.26 is probably the most relevant section for these comments. With respect to:</p> <p>a) The Northern fields of the site should not be developed in any way. They should be left alone and left natural. These fields are not actually brown field, despite their categorisation as such, and are the home of much local wildlife and vegetation. It has been this way for many many years with minimal intrusion by anyone, including the MOD, and so both wildlife and vegetation are well established. The Northern Fields should be minimally developed (Even footpaths through them should be minimised) so that the current wildlife is not disturbed. This approach aligns with the thinking of the majority of the local community and with Littleton &amp; Harestock Parish Council. It also aligns with all local approaches with respect to the Littleton local settlement gap, the need to protect open spaces and with Hampshire/Winchester Biodiversity policy. Moreover, that part of the site is presently be considered as a candidate SINC.</p> <p>b) Please consider the Council produced Map, found here:  <a href="https://winch.maps.arcgis.com/apps/webappviewer/index.html?id=4c4379c8d2c14f8c81033b4ffd1d4a3b">https://winch.maps.arcgis.com/apps/webappviewer/index.html?id=4c4379c8d2c14f8c81033b4ffd1d4a3b</a>  Please select "Brownfield Register 2023" &amp; "SHELAA Sites 2021" &amp; "New Shortlisted Sites" &amp; "Carried Forward Sites". Then zoom in quite closely top SJM Barracks until the SHELAA mapping is visible. It is violet.</p> <p>On the map it can be seen that there are a number of areas around SJM Barracks that are listed for potential developments. If these, and the SJM Barracks development are all progressed then there is substantial housing development happening around Littleton and North Winchester and Littleton will no longer be a village community on the outskirts of Winchester surrounded by open and wild spaces. It will become a suburb of Winchester, rather like Weeke. It should also be noted that that map does not illustrate the ecologically friendly developments presently under way at Three Maids Hill and across the A34 at the old Motocross site (i.e. the solar farm, the anaerobic digestion plant and the EV charging super hub. The people moving into these new homes will need places to work as well as live. Ideally they could walk or cycle to their work, rather than drive and will need to have ready access to green spaces.</p>

	<p>In light of these other potential developments and the development of a Northern Park &amp; Ride (which will provide ready access to the Barracks), it would make incredible sense to focus the redevelopment of SJM Barracks so that it is a hub for employment instead of new homes.</p> <p>I would like to suggest that the site should either be a science park, or the headquarter for a major employer (rather like IBM at Hursley, Vodafone at Newbury or Microsoft/Oracle at Reading). Another alternative might be a large public sector employer. So it could be a hospital or even a redevelopment of local schools/colleges (e.g. Peter Symonds, Henry Beaufort). Possibly a large government department looking to relocate from London.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The W2 part of the policy should take account of the wider development and transport planning that is under way for the North of Winchester and in particular the SHELAA planning for the areas around SJM. The redevelopment of SJM Barracks is a one off opportunity and it provides the Council with a chance to demonstrate and showcase the way employment, housing, transport, wildlife/nature and leisure can all be ergonomically, sustainably and effectively linked together in a holistic way.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>There should be a rethink about W2 and the way the site is to be used. It should not just be used for development of new homes. In the light of the further developments that will occur (as illustrated by the SHELAA plan) the entire wording of this section needs adjustment.</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>	W2
<b>Name of respondent (or client)</b>	Christopher Rice
<b>Personal reference number</b>	ANON-AQTS-3B87-W
<b>Full reference number</b>	ANON-AQTS-3B87-W/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Para 12.19 makes scant reference to the biodiversity-rich areas in the north part of the site, which recent surveys show include a number of threatened species including one on the IUCN Red List. As a result, this area has been put forward as a Candidate SINC, but no mention is made of this.</p> <p>Policy W2 does not include a requirement for the development to comply with Policy NE5, which requires the developer to demonstrate a 10% biodiversity net gain, in accordance with the Environment Act 2021.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Make reference in Para 12.19 to the northern part of the site being a Candidate SINC.</p> <p>Include a requirement in Policy W2 for a developer to demonstrate a 10% biodiversity net gain, in accordance with the Environment Act 2021.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Para 12.19 should be amended to read "This includes two large open grassland areas in the north/north-west of the site which have recently been included in a Candidate SINC application, and....."</p> <p>Policy W2 to include a new section as follows; " The proposals demonstrate a 10% biodiversity net gain in accordance with Policy NE5 and the Wildlife Act 2021. This gain shall be achieved within the development site and not by offsetting to another remote site."</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
<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>	No

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

<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Daniel Jenkins
<b>Personal reference number</b>	ANON-AQTS-32FU-S
<b>Full reference number</b>	ANON-AQTS-32FU-S/2/W2
<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>Legal Compliance:</b> The redevelopment plan for Sir John Moore Barracks does not appear to adequately address the retention or replacement of existing sports facilities, specifically the four grass pitches and the two 3G all-weather pitches currently available. This omission could raise legal compliance issues under the NPPF's requirement to promote healthy and safe communities. Under Paragraph 96 of the NPPF, local authorities are required to plan positively for sports facilities to meet current and future needs. By not accounting for these facilities, the plan may fail to meet obligations to ensure adequate recreational and community provisions. Without a clear strategy for either the preservation or substitution of these pitches, the plan may not align with national policy regarding the protection of recreational spaces, which are crucial for community well-being.</p> <p><b>Soundness of the Plan:</b> Positively Prepared: The plan does not fully address local needs for sports and recreational facilities, which is essential for community health and cohesion. The current proposal lacks a commitment to replace or preserve the existing pitches, suggesting that the plan might not be positively prepared to meet community needs.</p> <p><b>Justified:</b> For the plan to be justified, it should provide a robust and evidenced rationale for the omission of sports facilities. With no explicit reasoning provided, it is unclear why these facilities were excluded from redevelopment considerations. This gap raises questions about whether the plan reflects an appropriate strategy for balancing residential development with essential recreational spaces.</p> <p><b>Effective:</b> The plan lacks specificity regarding how it will compensate for the loss of sports pitches, which raises doubts about its effectiveness. The plan should detail how it will maintain or enhance access to sports facilities for both the new and existing community members, yet it does not, suggesting that this omission could hinder the plan's practical execution.</p> <p><b>Consistent with National Policy:</b></p>

	<p>The NPPF advocates for the retention and improvement of existing sports and recreational facilities unless they are demonstrably surplus to requirements. The absence of provisions for the current pitches does not seem to align with this policy and may not support the overarching goal of sustainable development that caters to all community needs.</p> <p>Compliance with the Duty to Co-operate: The plan's duty to co-operate requires effective engagement with local communities, sports organizations, and stakeholders to ensure that community needs are met. By not addressing the fate of the existing sports pitches, it is unclear whether adequate consultation has been undertaken with affected stakeholders, such as local sports clubs, schools, and community groups. True compliance would involve collaborative efforts to seek stakeholder input and identify opportunities to preserve or replace sports facilities.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Include the same sports pitch provision in the new development as there are on the current site.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The redevelopment of Sir John Moore Barracks shall include provisions to replace the existing sports facilities in a manner that ensures no net loss of recreational opportunities. Specifically:</p> <p>Sports Pitches: The new development must incorporate four grass pitches and two 3G all-weather pitches, reflecting the current provision at the Barracks. These facilities should be designed to equivalent or enhanced standards to meet modern usage requirements and to support diverse recreational activities for both the new residents and the surrounding community. The pitches should be accessible to the public and integrated within the neighborhood's green infrastructure to promote community cohesion and active lifestyles.</p> <p>Community Access: The sports pitches should be developed with consideration for community access outside of school hours, providing opportunities for local sports clubs, schools, and residents to utilize the facilities. Management and maintenance plans should be established to ensure long-term availability and quality, involving local stakeholders and sports organizations to support sustainable use.</p> <p>Alignment with NPPF Requirements: In accordance with Paragraph 96 of the NPPF, the provision of sports pitches must support the community's health and well-being, ensuring that the recreational needs of the population are fully met. Any proposal that includes a reduction in current recreational facilities shall be supported by a needs assessment demonstrating that the facilities are surplus to requirements or are being replaced with equal or</p>

	improved provision. By maintaining the same sports pitch provision within the new development as currently available, this policy ensures the continuity of recreational opportunities, supporting the physical health and social well-being of the community, and aligns with the NPPF's objectives to promote sustainable and healthy 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, such as images, tables, or tracked changes, if applicable.</i>	No



<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/2/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Looks like a sensible development for a combination of residential and industrial use. We need to hear why Andover Road is being closed - it has not been explained properly and appears to be totally illogical.
<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>	W2
<b>Name of respondent (or client)</b>	David Allen Drake
<b>Personal reference number</b>	ANON-AQTS-3BTR-M
<b>Full reference number</b>	ANON-AQTS-3BTR-M/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied
<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>	W2
<b>Name of respondent (or client)</b>	David Baldwin
<b>Personal reference number</b>	ANON-AQTS-3B1S-J
<b>Full reference number</b>	ANON-AQTS-3B1S-J/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The petition has some 3200 signatures.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council to RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks development or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore re-development require the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Debbie Baker
<b>Personal reference number</b>	BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation
<b>Full reference number</b>	BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/1/W2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	The MOD welcome the provision at Pg 317 (12.27) Housing Allocations: Sir John Moore Barracks: Ensure that any development or the use of the land do not interfere, compromise or degrade an air traffic control signal that runs between a series of ground radio antennas which are used by the Ministry of Defence. see additional info in 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 (commenting on policies)</a> <a href="#">Supporting information (commenting on policies and safeguarding zones)</a>

<b>Policy/Evidence base document</b>	W2
<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/2/W2
<b>Legally compliant?</b>	No
<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>DIO owns the Sir John Moore Barracks (SJMB) site, on the northern edge of the urban area of the City. Our representations make reference to the page and paragraph numbers used in the Reg 19 consultation draft. DIO strongly supports the inclusion of Policy W2 within the Reg 19 Local Plan. This policy relates specifically to the Sir John Moore Barracks (SJMB) site and allocates/establishes requirements for its future residential-led development, to deliver between 750 to 1,000 homes. The overall approach set out in Policy W2 will help to ensure that this key and significant previously developed landholding is suitability and sustainably planned for in the future and makes effective use of land in accordance with Paragraphs 11a and 123 of the National Planning Policy Framework (NPPF) (2023). The SJMB site will become surplus to military requirements from 2026, when operational output ceases and DIO remains keen to continue to work collaboratively with Winchester City Council (WCC) and other stakeholders to deliver development on the site.</p> <p>Part i) of the policy requires that any application for development is preceded by, and consistent with, a comprehensive site wide masterplan (informed by relevant evidence base reports and assessments) which demonstrates how high-quality design, green spaces and settlement gaps will be delivered for the whole site which has involved and engaged with stakeholders and interested parties before it is agreed [our emphasis] by the local planning authority. This draft policy does not identify the mechanism by which this masterplan should be ‘agreed’ by the council in its capacity as Local Planning Authority, and we request that WCC needs to clarify what it means by ‘masterplanning process’.</p> <p>Part vii) Access off Andover Road We note the requirement, at part vii) that the site access should be off Andover Road – this should be referenced as Andover Road/North as the precise boundary of the road name change for the road corridor is uncertain. We also note that the WCC’s Strategic Transport Assessment (STA) (August 2024) analyses strategic traffic flows in the Andover Road/Andover Road North corridor and considers potential traffic impacts from new development, such as at SJMB, together with an assumed rate in the increase in background traffic growth. That analysis (see para 6.16 of the STA) then models anticipated traffic flows using the junction</p>

design for Andover Road/North and Harestock Road that was approved (at appeal) as part of the grant of planning permission for the “Kings Barton” estate in 2012. The approved junction facilitates the diversion of Andover Road North through the new Kings Barton scheme. The Kings Barton development is well advanced and numerous dwellings are occupied. However, the approved junction has not yet been constructed. We are aware that Cala Homes (the developers of Kings Barton) and Hampshire County Council are discussing potential changes to the approved junction design. These changes could result in a reduction in the capacity of this junction, to the extent that the revised junction layout may not be able to satisfactorily accommodate future traffic flows arising from the development of SJMB/background traffic growth to the detriment of the future free flow of traffic in the local network. Of particular concern to DIO is the impact of changes to the southbound right turn capacity into Harestock Road. The approval, or implementation, of a revised junction design with less capacity than the design currently approved would seem to potentially undermine WCC’s transport evidence base (traffic/movement flow analysis) that underpins the emerging Local Plan. The potential implications of this for the soundness of the plan are significant. Therefore, any change to the approved Andover Road North/Harestock Road junction design should be subject to public scrutiny through the seeking of a S.96a/S.73 application to propose any changes to that previously approved junction design as the matter is not solely one of detailed design and implementation in Highway terms of the ‘approved junction’ and has consequential implications.

Part xvii) DIO is undertaking a review of the potential re-purposing of the existing swimming pool/gyms to create a new ‘sports complex’ or otherwise securing its potential reuse (which is likely to require a new power supply and heat plant) and is also assessing the viability associated with the conversion (and possible extension) costs in the context of identifying market/operator demand and also considering the future operational costs associated with running a sports complex. This ‘Sports Complex’ review is not anticipated to be completed to inform the submission of an outline planning application to propose the redevelopment of the SJMB site and accordingly the area for the potential ‘sports complex’ will be excluded from that application/application site. In the event the ‘sports complex’ is technically feasible and viable to deliver it will come forward as a separate planning application.

Part xix) establishes that the proposals should include a Park and Ride facility, of approximately 850 spaces, and states that the facility should be operationally connected to the 200 Space ‘Park and Ride Light’ at Kings Barton. Part (xix) also states that the scale and location of the Park and Ride site should be determined (our emphasis) through the ‘masterplanning’ process. DIO supports the City Council’s aspiration for the delivery of a Park and Ride car park to the north of Winchester. DIO welcomes the aspiration to promote sustainable travel modes in general throughout the City. The DIO have agreed to the principle of the siting of the Winchester Movement Strategy requirement for a northern approach Park and Ride facility within the site. DIO has confirmed its willingness for the principle to include a multi-storey Park and Ride car park in its redevelopment proposals and through masterplan optioneering a suitable land parcel has been identified for

use as a multi-storey Park and Ride car park. That location is in principle acceptable to the operational requirements of Hampshire County Council/Winchester City Council who will take forward development of this new public infrastructure. A Park and Ride 'facility' is not required on the site to make the SJMB redevelopment proposals acceptable in planning terms. However, the aspiration to deliver and operate a north Winchester Park and Ride facility stems from the City Council's wish to address existing traffic congestion problems in the centre of Winchester. As a result, it is also not appropriate for the Local Plan to include a requirement for an operational link between the two park and ride facilities. DIO will not be involved in the delivery or operation of the Park and Ride car park – this car park is not required to make the redevelopment of the SJMB site acceptable in planning terms. The inclusion of a requirement for an operational link is unjustified and unreasonable. Furthermore, it is not appropriate for the Local Plan to include a requirement that the scale (i.e. the number of park and ride spaces) of the park and ride should be determined as part of the masterplanning process. The park and ride car park is not needed to make the redevelopment of the SJMB site acceptable in planning terms. Accordingly, scale is a matter for the City Council, Hampshire County Council (HCC) and other relevant stakeholders to take forward. DIO has taken the required capacity (of up to 850 spaces) at face value, an 'up to capacity' informed by HCC as an appropriate sized facility and DIO will reflect this size in a future planning application. The location of the multi-storey Park and Ride car park within the SJMB Concept Masterplan has been agreed in principle by HCC, we will therefore include the Park and Ride in this location at the planning application stage. A multi-storey car park solution is needed to accommodate up to 850 spaces as there is insufficient land in SJMB in the right location for a surface level solution for up to 850 spaces. The identification of a site for a Park and Ride scheme would contribute towards Winchester City Council's strategic objectives of promoting sustainable travel in the city, as set out in the "Winchester Movement Strategy Feasibility Studies – Phase 2 Summary Report" (2021) and prioritises securing funding from Central Government under this strategy by Winchester City Council and Hampshire County Council for new park and ride provision in the Andover Road corridor.

Minor changes are requested in relation to parts ii), iii) and xvi) of Policy W2 to make it sound. In respect of part ii), amendments are requested to clarify the nature/scope of an application submission to create sufficient flexibility for more than one planning application being able to be submitted to propose the redevelopment of the barracks. In relation to part iii) a minor change is recommended as the number of local centres within the SJMB masterplan is not yet known. With regard to part xvi) in relation to the retention of the Chapel building, details for its re-use are not currently known and therefore a minor change is proposed to delete reference to future community use.

Also request a small number of associated changes should be made to the supporting Policy W2 text to either clarify ambiguities or correct factual errors, or in the interests of soundness as follows. Para 12.15 – clarification is needed regarding the status of the 'master planning process' to be carried out in advance of

the submission of a planning application. DIO is engaged in the preparation of a Concept Masterplan (CMP) and is working with officers from WCC in this regard. The CMP exercise has involved extensive engagement with the local community and other stakeholders. DIO's understanding is that the Council will consider the transparency and robustness of the CMP preparation process only in advance of the submission of a planning application. Para 12.15 – we maintain that the whole of the SJMB site falls within the definition of previously developed land (PDL) that is set out in Annex 2 to the NPPF (2023). The open training areas, woodland and all other parts of the site are used in association with the overall use of the site for military training. The woodland was planted and the barracks constructed as a military training environment as part of the development of the site 1983-1986. The NPPF definition of PDL establishes that it includes buildings and their curtilage. Case law and appeal decisions establish that the curtilage of a building(s) includes all surrounding land that is in the same use. References to only part of the site comprising PDL are inaccurate (similar changes will need to be made to para 12.26).

Para 12.18 – reference is made to the main SJMB access being off Andover Road North whilst part vii) of Policy W2 refers to Andover Road – we request reference is made to Andover Road/North. We have recommended that this be amended to refer to “Andover Road/North”.

Para 12.20 – 12.22 – it is important to note that any potential impacts relating to nitrates and phosphates relates to a redevelopment scheme must be considered on the basis of the ‘net’ potential impacts arising over and above those arising from existing military operations. Additional Wastewater Treatment Works permit upgrades are associated with the Levelling Up and Regeneration Act (LURA). The LURA places a legal obligation on water and sewerage providers to upgrade WwTW with a greater than 2,000 population equivalent (PE) to the highest Technologically Achievable Limit (TAL) by 2030 for both phosphorous and nitrogen, which is enforceable via the provisions of Section 18 of the Water Industry Act, 1991.

A land use budget was prepared based on previous masterplan comparing baseline land and water use against potential future land and water uses. This remains to be refined as DIO's emerging draft masterplan and land uses evolve and in consultation with Natural England. An updated nutrient neutrality assessment was undertaken (June 2024) using the latest nutrient neutrality metric and an indicative version of a masterplan (assuming 919 units) in order to provide assurance for the scheme given change in calculation metric and impact of Phosphorous. In summary that updated June 2024 assessment (based on 919 units) indicates that there will be no need for on-site mitigation post 2030 and no need for pre-2030 for mitigation up to a threshold of 669 units. This assessment is subject to Natural England needing to agree budget calculations. A further budget update will be completed as part of preparing an OPA to propose the redevelopment of the SJMB site.



	<p>Para 12.23 – refers to the settlement boundaries for Winchester and states that the settlement boundary which currently excludes the SJMB site will not be extended to include the SJMB site until the extent of the developable area is known. Several paragraphs in draft Policy W2 confirm that the allocation relates to the whole of the SJMB site. There appears no valid planning reason not to support the inclusion of the SJMB allocation as being within a settlement boundary at this point in time. We request that the settlement boundary should be altered to include all of the proposed allocation at SJMB (see comments in relation to Policies SP3 and H4. Para 12.25 – this paragraph refers to a nursery which is being used occasionally by the public which is incorrect as the SJMB site does not contain an operational nursery as this closed some time ago.</p> <p>Para 12.26 – reference is made (as also in para 12.27) to part of the SJMB allocation being located in a settlement gap. On the basis Sir John Moore Barracks is to be an allocated site the Settlement Gap plan must now be amended to provide sufficient flexibility for the masterplan to be delivered whilst respecting a new settlement gap that is yet to be determined. A suggested settlement gap plan is shown and the policy should allow flexibility for refinement to accommodate the masterplan being brought forward. The existing built-up areas (including associated curtilage/roads/infrastructure) should be excluded from the settlement gap (particularly in view of Policy W2 part iv) which seeks to focus redevelopment on part of the barracks site which is currently located within the Littleton Settlement ‘gap’) – see our comments in relation to Policy NE7.</p> <p>Para 12.27 – see comments above.</p> <p>Para 12.29 – in respect of the Park and Ride, we request several changes are made to clarify the nature of this part of the SJMB allocation.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Page 313 of the Reg 19 plan states that the allocated use of the site is for mixed use and park and ride – we request the following changes are made to clarify the nature of the allocation: Allocated Uses:</p> <p>Part i) Comprehensive Site Wide Masterplan We request the following amended wording is introduced: i) Any planning application proposing redevelopment of the barracks should be supported by a comprehensive and evidence based site wide masterplan which demonstrates how high quality design, green spaces, and settlement gaps will be delivered relating to the whole site. The preparation of a site wide masterplan should include the involvement and engagement with relevant stakeholders and interested parties.</p> <p>Part vii) Access off Andover Road. To avoid ambiguity and provide clarity of intent, we request the following amended wording is introduced: vii) Access should be off Andover Road/Andover Road North</p> <p>Part xvii) Existing Gym, Leisure Facilities and Swimming pool</p>

	<p>Part xvii) The proposals include an assessment of the condition, age and the technical feasibility/viability to demonstrate the ability to retain/refurbish/redevelop, viably operate/ incorporate the existing gym, leisure facilities and the swimming pool as part of the wider residential led scheme. If the assessment has not been completed to inform/be included at the time of the submission of an initial planning application to propose the redevelopment of the Sir John Moore Barracks site, then land to accommodate the potential ‘sports complex’ shall be excluded from that application site boundary and be bought forward at a later date (but for that later application to be informed by pre-application consultation with the Council).</p> <p>Part xix) Park and Ride Facility</p> <p>Recommend that part xix) states the following only:</p> <p>xix) The proposals include land for a multi-storey Park &amp; Ride car park for up to 850. The location of the Park &amp; Ride facility to include the provisions of electrical charging points and cycle parking should be determined through the site wide masterplanning process and include the provisions of electrical charging points and cycle parking facilities</p> <p>Minor changes are requested in relation to parts ii), iii) and xvi) of Policy W2 to make it sound as set out below.</p> <p>ii) A single planning application covering the whole of the allocated site is preferred. If a planning application covers part of the site only, the proposals should not in any way prejudice the implementation of the masterplan vision for the whole site.</p> <p>xvi) The proposals include an assessment of the condition, age and the technical feasibility/viability for the retention of the existing Chapel as part of any new development, which may help to reinforce links to the historical military associations with Winchester.</p> <p>Para 12.29 – in respect of the Park and Ride, we request several changes are made to clarify the nature of this part of the SJMB allocation.</p> <p>As the site is located on one of the key radial routes into the city centre (Andover Road), the City of Winchester Movement Strategy has identified that there is need to reduce city centre traffic by increasing the number of Park &amp; Ride facilities with a particular need to provide a car park on the north side of the city. In order to meet this need, there is an opportunity, as part of the comprehensive redevelopment of this site, to allocate land within the masterplan for up to an 850 multi-storey space Park &amp; Ride car park. The scale and location of the multi-storey Park &amp; Ride car park should be considered as part of the master planning process and be in a location that is physically connected to sustainable modes of transport and capable of providing electrical charging points and cycle parking</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Page 313 of the Reg 19 plan states that the allocated use of the site is for mixed use and park and ride – we request the following changes are made to clarify the nature of the allocation: Allocated Uses:</p> <ul style="list-style-type: none"> <li>I) Residential led mixed use</li> <li>II) Park and ride car park</li> </ul>

Policy W2

Part i) Comprehensive Site Wide Masterplan

We request the following amended wording is introduced:

i) Any planning application proposing redevelopment of the barracks should be supported by a comprehensive and evidence based site wide masterplan which demonstrates how high quality design, green spaces, and settlement gaps will be delivered relating to the whole site. The preparation of a site wide masterplan should include the involvement and engagement with relevant stakeholders and interested parties.

Part vii) Access off Andover Road. To avoid ambiguity and provide clarity of intent, we request the following amended wording is introduced: vii) Access should be off Andover Road/Andover Road North

Part xvii) Existing Gym, Leisure Facilities and Swimming pool

Part xvii) The proposals include an assessment of the condition, age and the technical feasibility/viability to demonstrate the ability to retain/refurbish/redevelop, viably operate/ incorporate the existing gym, leisure facilities and the swimming pool as part of the wider residential led scheme. If the assessment has not been completed to inform/be included at the time of the submission of an initial planning application to propose the redevelopment of the Sir John Moore Barracks site, then land to accommodate the potential 'sports complex' shall be excluded from that application site boundary and be bought forward at a later date (but for that later application to be informed by pre-application consultation with the Council).

Part xix) Park and Ride Facility

Recommend that part xix) states the following only:

xix) The proposals include land for a multi-storey Park & Ride car park for up to 850. The location of the Park & Ride facility to include the provisions of electrical charging points and cycle parking should be determined through the site wide masterplanning process and include the provisions of electrical charging points and cycle parking facilities

Minor changes are requested in relation to parts ii), iii) and xvi) of Policy W2 to make it sound as set out below.

ii) A single planning application covering the whole of the allocated site is preferred. If a planning application covers part of the site only, the proposals should not in any way prejudice the implementation of the masterplan vision for the whole site.

xvi) The proposals include an assessment of the condition, age and the technical feasibility/viability for the retention of the existing Chapel as part of any new development, which may help to reinforce links to the historical military associations with Winchester.

Para 12.29 – in respect of the Park and Ride, we request several changes are made to clarify the nature of this part of the SJMB allocation. As the site is located on one of the key radial routes into the city centre

	<p>(Andover Road), the City of Winchester Movement Strategy has identified that there is need to reduce city centre traffic by increasing the number of Park &amp; Ride facilities with a particular need to provide a car park on the north side of the city. In order to meet this need, there is an opportunity, as part of the comprehensive redevelopment of this site, to allocate land within the masterplan for up to an 850 multi-storey space Park &amp; Ride car park. The scale and location of the multi-storey Park &amp; Ride car park should be considered as part of the master planning process and be in a location that is physically connected to sustainable modes of transport and capable of providing electrical charging points and cycle parking</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>	W2
<b>Name of respondent (or client)</b>	E Back
<b>Personal reference number</b>	ANON-AQTS-3BDP-2
<b>Full reference number</b>	ANON-AQTS-3BDP-2/3/W2
<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 proposed policy W2 for the Sir John Moore Barracks site is not sound as it does not take account of the evidence base prepared for the Local Plan, including specifically the Open Space Assessment 2022. The Open Space Assessment 2022 documents that the Winchester Town area has a large deficit of sports grounds, parks and recreation grounds. Specifically, the Winchester Town ward adjacent to the site covered by policy W2, St Barnabas, has a shortfall of recreational open space totalling 9.7 hectares (5 hectares of sports grounds and 4.7 hectares of parks and recreation grounds) when assessed against existing Local Plan policy CP7.</p> <p>The current masterplan for the Sir John Moore Barracks site (which is out for public consultation currently) will remove one of the existing sports grounds included in the Open Space Assessment 2022, on Harestock Road (which is supposedly protected under existing Local Plan policy DM5), increasing the deficit by a further 1.1 hectare. Consistent with policy W2, the current masterplan for Sir John Moore Barracks proposes the creation of 850 new homes, and assumes a population of 2.4 people per home, which would result in a projected population increase of 2040. It proposes retaining 1.9 hectares of the existing Army sports grounds on the site. When the associated loss of the Harestock Road playing pitch is taken into account, this results in a net gain of just 0.8 hectares across the site itself and the adjacent St Barnabas Ward. However, a population of 2040 people would require 2.448 hectares of playing pitches within 3.264 hectares of land for outdoor sports according to the Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020), and they would require 3.06 hectares of parks, sports and recreation grounds of which 1.53 hectares is for outdoor sport according to the weaker standards set out in Regulation 19 Local Plan policy NE3. The Sir John Moore Barracks masterplan will therefore result in a shortfall of -0.73 ha relative to the Regulation 19 Local Plan standards for outdoor sport, -1.648 ha relative to FIT guidelines for playing pitches and -2.464 ha relative to FIT guidelines for all outdoor sport.</p> <p>Policy W2 must require more of the Sir John Moore Barracks site with respect to its sporting facilities and playing pitch provision, therefore, to avoid worsening the already dire situation documented in the Local Plan evidence base and specifically the Open Space Assessment 2022.</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The proposed policy W2 for the Sir John Moore Barracks site is not sound as it does not take account of the evidence base prepared for the Local Plan, including specifically the Open Space Assessment 2022. The Open Space Assessment 2022 documents that the Winchester Town area has a large deficit of sports grounds, parks and recreation grounds. Specifically, the Winchester Town ward adjacent to the site covered by policy W2, St Barnabas, has a shortfall of recreational open space totalling 9.7 hectares (5 hectares of sports grounds and 4.7 hectares of parks and recreation grounds) when assessed against existing Local Plan policy CP7.</p> <p>The current masterplan for the Sir John Moore Barracks site (which is out for public consultation currently) will remove one of the existing sports grounds included in the Open Space Assessment 2022, on Harestock Road (which is supposedly protected under existing Local Plan policy DM5), increasing the deficit by a further 1.1 hectare. Consistent with policy W2, the current masterplan for Sir John Moore Barracks proposes the creation of 850 new homes, and assumes a population of 2.4 people per home, which would result in a projected population increase of 2040. It proposes retaining 1.9 hectares of the existing Army sports grounds on the site. When the associated loss of the Harestock Road playing pitch is taken into account, this results in a net gain of just 0.8 hectares across the site itself and the adjacent St Barnabas Ward. However, a population of 2040 people would require 2.448 hectares of playing pitches within 3.264 hectares of land for outdoor sports according to the Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020), and they would require 3.06 hectares of parks, sports and recreation grounds of which 1.53 hectares is for outdoor sport according to the weaker standards set out in Regulation 19 Local Plan policy NE3. The Sir John Moore Barracks masterplan will therefore result in a shortfall of -0.73 ha relative to the Regulation 19 Local Plan standards for outdoor sport, -1.648 ha relative to FIT guidelines for playing pitches and -2.464 ha relative to FIT guidelines for all outdoor sport. Policy W2 must require more of the Sir John Moore Barracks site with respect to its sporting facilities and playing pitch provision, therefore, to avoid worsening the already dire situation documented in the Local Plan evidence base and specifically the Open Space Assessment 2022.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Inter alia, add a further bullet to paragraph 12.27, as follows:</p> <ul style="list-style-type: none"> <li>- Consider and address the requirement for sports ground provision to meet the needs of the development and to reduce the shortfall of sports grounds across the adjacent Wards of St Barnabas and Littleton that is documented in the Winchester Open Space Assessment 2022.</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>
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<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Ellen Satchwell
<b>Personal reference number</b>	BHLF-AQTS-3282-8 - Natural England
<b>Full reference number</b>	BHLF-AQTS-3282-8 - Natural England/3/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Welcome specific inclusion of protecting the nuns stream winterbournes and the onsite SINC. We understand there is also a candidate SINC located on the northern part of the site, you may wish to consider expanding paragraph x to include assessment and retention of the candidate site.
<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)</a> <a href="#">Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</a> <a href="#">Form (commenting on Air Quality only)</a>



<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Extinction Rebellion Winchester
<b>Personal reference number</b>	ANON-AQTS-32N9-5
<b>Full reference number</b>	ANON-AQTS-32N9-5/1/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>2. Sir John Moore Barracks (Policy W2)</p> <p>2.1 Biodiversity</p> <p>2.1.1 The Sir John Moore Barracks site will have significant 'in combination' effects on the integrity of European Sites, other designated sites, and the local biodiversity network (see section 1.7 above). We urge the Planning Authority to robustly protect these sites. We support Littleton and Harestock Parish Council's proposal to protect the northern part of the allocation by retaining the chalk downland as a Country Park.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The allocation will require a Habitats Regulation Assessment due to the potential significant effect on the integrity of European sites. An assessment should also be required to assess in-combination effect on the integrity of other designated sites and the local biodiversity network. The candidate SINC should be given the same importance as the SINC. The chalk downland should be retained as a country park and appropriate buffers for development should be required around the SINC and cSINC, due to the impact of the proposed residential development on water supply mechanisms, water quality and functional land outside the SINC and cSINC, which birds depend on for feeding, and the increase in people which can increase disturbance to birds, and put more recreational pressure on sensitive sites, we recommend a buffer zone of at least 50m.</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>	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>	W2
<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-3/1/W2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	current proposals need to incorporate far more space and corridors for wildlife
<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 NE1)</a> <a href="#">Email (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W2
<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/3/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year. On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.
<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>	W2
<b>Name of respondent (or client)</b>	Grace Hambleton
<b>Personal reference number</b>	ANON-AQTS-3BFP-4
<b>Full reference number</b>	ANON-AQTS-3BFP-4/1/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Andover Road to be kept open to avoid : a) unnecessary costs and loss of access during closure, and re-opening when the Sir John Moore Barracks site is developed; b) unsuitable level and type of traffic through the Kings Barton estate.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove the proposal to close Andover Road.
<b>What is your suggested wording or text for the policy?</b>	Retain Andover Road as a through road for traffic to enable access to the Sir John Moore Barracks development and avoid unsuitable traffic through Kings Barton.
<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>	W2
<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-32T7-9/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy W2 : St. John Moore Barracks My client would query whether there is sufficient certainty that all of the allocation, particularly the residential parcels, will be delivered within the plan period. It is understood that consultation with the local community and key stakeholders is currently ongoing ahead of the submission of an outline application in Spring 2025. The timescales set out within the consultation web site suggest delivery of new homes from 2027. This is ambitious, and past experience with delivery of housing from large sites such as this will take longer than this : ‘...sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 to 1.6 years to deliver the first dwelling.’ (Start to Finish 3 Lichfields – March 2024 Executive Summary). This would suggest delivery from 2031-32 at the earliest, making it very challenging to delivery up to 1,000 completions by 2040.
<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</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</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>	W2
<b>Name of respondent (or client)</b>	Helen McCall
<b>Personal reference number</b>	BHLF-AQTS-326J-X
<b>Full reference number</b>	BHLF-AQTS-326J-X/1/W2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	The sale of this green lung of Winchester for housing development would be both a devastating loss of wild habitat, a loss of green space for people's mental and physical wellbeing , and a massive strain on the already over strained infrastructure of Winchester. I want to oppose this land being developed.
<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>	W2
<b>Name of respondent (or client)</b>	Henrietta Boucher
<b>Personal reference number</b>	ANON-AQTS-3BFT-8 - Crawley Parish Council
<b>Full reference number</b>	ANON-AQTS-3BFT-8 - Crawley Parish Council/2/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	i - masterplan needs to consult more with stakeholders including neighbouring parishes to ensure settlement gaps are maintained and green spaces preserved. vii - access on to Andover Road - this makes sense as the road is used now, but the policy does not appear take into consideration any proposed re-routing of the Andover Road.
<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>	W2
<b>Name of respondent (or client)</b>	Jill North
<b>Personal reference number</b>	ANON-AQTS-3BTN-G
<b>Full reference number</b>	ANON-AQTS-3BTN-G/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council to keep open Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to keep open Andover Road to traffic before any dwellings are constructed on the redevelopment 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>	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>	W2
<b>Name of respondent (or client)</b>	JJ Heath-Caldwell
<b>Personal reference number</b>	ANON-AQTS-3BKD-W
<b>Full reference number</b>	ANON-AQTS-3BKD-W/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	John Cooper
<b>Personal reference number</b>	ANON-AQTS-32DP-J
<b>Full reference number</b>	ANON-AQTS-32DP-J/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The re-development of Sir John Moore Barracks is not an appropriate strategy in view of the existing plan to close Andover Road and divert it through Kings Barton. The re-development will generate considerable extra vehicle traffic to/from the city. The proposed Park and Ride Light uses existing bus services, which the current timetable shows to be 1 bus per hour to the city, which is clearly insufficient, so most journeys to the city centre will be by car. The impact of the proposed 750 - 1000 dwellings will be extra traffic attempting to make its way through the centre of Kings Barton with the consequence of increased emissions and reduction in safety for the people of Kings Barton.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	A commitment not to re-develop the Sir John Moore Barracks site if Andover Rd is closed and the traffic diverted through Kings Barton.
<b>What is your suggested wording or text for the policy?</b>	Policy W2 vii. Access should be off Andover Rd. However due to the increase in traffic that will be created this policy explicitly states that the development of the Sir John Moore Barracks site will NOT proceed if capacity of Andover Road is reduced by diversion through the Kings Barton estate.
<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>	No

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

<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	John J Lewis
<b>Personal reference number</b>	ANON-AQTS-3BA1-Z
<b>Full reference number</b>	ANON-AQTS-3BA1-Z/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The closure of Andover Road as a requirement for the Barton Farm and John Moore Barracks developments are both un-necessary and detrimental to those living there and us as neighbours.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Drop the requirement for Andover Road to be closed.
<b>What is your suggested wording or text for the policy?</b>	Andover Road to remain open
<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>	W2
<b>Name of respondent (or client)</b>	John Ritchie-Cox
<b>Personal reference number</b>	ANON-AQTS-3BZV-X
<b>Full reference number</b>	ANON-AQTS-3BZV-X/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Juliet Hawkes
<b>Personal reference number</b>	ANON-AQTS-3BK8-H
<b>Full reference number</b>	ANON-AQTS-3BK8-H/2/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The proposed plans suggest that the site will use the Andover Road as the main port of vehicular entry, but makes no mention that any traffic using the Andover Road to enter Winchester City will have to go through the Abbots Barton Housing Estate. This would seem to me to add to any congestion which is likely to be experienced by the new road going through Abbots Barton, which will have a 75% increase once that estate is complete. This development will add a further 1,000 houses and their associated traffic, and there is little to demonstrate how that will work out, and while there is a place for cycle paths and footpaths, it is unlikely that there will be no increase in traffic going through the neighbouring estate once the Andover Road is re-routed.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There needs to be serious consideration of the implications of re-routing the Andover Road through Abbots Barton, and if possible reversing this decision, which was never properly reviewed and consulted upon when it was made, and this new housing development adds weight to the 'Do Minimum' policies proposed in the Transport Policy documents.
<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>	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>	W2
<b>Name of respondent (or client)</b>	Keith Cooper
<b>Personal reference number</b>	ANON-AQTS-3B1X-Q
<b>Full reference number</b>	ANON-AQTS-3B1X-Q/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Krystyna Kaminski-Cook
<b>Personal reference number</b>	ANON-AQTS-3B6F-A
<b>Full reference number</b>	ANON-AQTS-3B6F-A/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I call on Winchester City Council and Hampshire County Council to RE-OPEN Andover Road as a requirement for the approval of the Sir John Moore Barracks
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	I call on Winchester City Council and Hampshire County Council to RE-OPEN Andover Road as a requirement for the approval of the Sir John Moore Barracks
<b>What is your suggested wording or text for the policy?</b>	I call on Winchester City Council and Hampshire County Council to RE-OPEN Andover Road as a requirement for the approval of 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>	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>	W2
<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/8/W2
<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> <ol style="list-style-type: none"> <li>1. The Parish Council has set out its objections to the masterplan approach under Policy D5. The Parish Council has a number of specific issues with Policy W2 and the approach taken by WCC.</li> <li>2. The first issue is the lack of detail set out in the policy to guide the preparation of a masterplan. The number of homes is presented as a range of 750-1000 dwellings however a figure of 900 dwellings is assumed by WCC in its estimates of sources of supply (ref paragraph 12.15). This figure was arrived at in the Regulation 18 local plan before the northern fields were designated as a candidate SINC.</li> <li>3. The assessment of the site as set out in the Development Strategy and Site Selection Proposed Submission Plan Topic Paper, July 2024 and Appendix 3, July 2024 which has informed the assumed capacity has not fairly reflected the site's characteristics. It describes the site as sitting in a shallow valley when clearly much of it is on higher ground i.e. the northern fields. The site is recorded as already being developed when that is not the case. It downplays the ecological value of the site and under-estimates the visual impact of development, there is no reference to the impact on settlement character and the proposed settlement gap. It appears that the appraisal has adopted a general approach to the appraisal of the site rather than understanding its particular characteristics, which had that been done would have provided a more informed assessment of the capacity of the site to accommodate development.</li> <li>4. The Integrated Impact Assessment Report, July 2024, records an overall significant negative impact in respect of biodiversity arising from the proposed allocation and major negative impact in relation to locally designated wildlife sites based on the existing Flowerdown SINC. The loss of land within the candidate SINC would mean that a much larger area would be affected by development which would suggest that the overall impact should reflect the scale of loss of ecologically important land i.e. major negative impact.</li> <li>5. The second issue is the graphic used to support the Policy W2 for the site. The whole of the site is shaded which gives the impression that all of it could be developed, but the supporting text to the policy states that not all of the site is proposed or suitable for development (ref paragraph 12.15). The existing Flowerdown SINC (ref paragraph 12.19), the Winchester-Littleton Settlement gap (ref paragraph 12.26), and the candidate SINC which includes the northern fields are not shown on the graphic despite being key</li> </ol>

constraints. The local plan proposes a settlement gap and it appears that the existing boundary is to be retained and reviewed in a future review. This is a very muddled approach and lacks the clarity required of a development plan document.

6. The site also includes land which is currently providing much-needed green space within the Littleton Gap, as well as offering the potential for access to wildlife and outdoor pursuits for residents in the adjacent areas, such as Harestock where residents have very little green space within easy reach. The relatively unspoilt nature of this green space is likely to mean that the land has potential for supporting a wide range of flora and fauna, the loss of which would have an adverse impact on biodiversity.

7. The third issue is the lack of clarity on the area which WCC considers would be required to deliver 900 homes. The Parish Council does not object to the redevelopment of the existing areas where there is built development but any additional areas should only be identified after a careful consideration of the site's constraints and policy requirements including the retention of a settlement gap and extent of the SINC.

8. The Parish Council considers that the existing constraints should be identified in the policy, shown on a detailed proposals map for the site and used to inform the capacity of the site in terms of numbers of homes. Policies D1 and D2 provide guidance on the matters to be taken into account in the design of schemes. It would be more informative if Policy W2 had been drafted using these policies as a framework for setting out detailed requirements to be addressed within the site masterplan.

9. The fourth issue is the reliance on a masterplan prepared by the landowner/developer to provide the planning framework for an important strategic site. See the relevant response to Policy D5. The consultation undertaken by the DIO, the promoters of the site, in August/September 2024 has only reaffirmed the Parish Council's concerns regarding the masterplan approach and the lack of clear guidance in Policy W2. There is no reference to the candidate SINC, there is only a passing reference to the potential for a settlement gap covering part of the site. The overall approach appears to be driven by the delivery of the proposed local plan figure of 900 homes and a park and ride site rather than to assess the key site constraints to inform the scale of development which would be acceptable given the policy requirements of the other policies of the local plan.

10. Having regard to the policies in the local plan the Parish Council considers that in its current form, Policy W2 is in conflict with Policies SP2, NE1, NE5, NE7, NE9 and NE14

11. Policy W2 proposes a park and ride facility of approximately 850 spaces. The Parish Council have a number of issues with respect to this proposal.

12. It would be an extensive area of hard surfacing with associated infrastructure and lighting located in the countryside which would have a significant impact, on the landscape and drainage on a key approach to Winchester. The need for such a large facility has not been fully demonstrated by WCC. The existing park and ride sites are operating below their capacity. The projected demand for additional spaces is based on work which pre-dates the Covid 19 pandemic which is having a significant impact on working practices and the need to travel to work (ref The Winchester Movement Strategy Feasibility Study July 2020 drafted in the early months of 2020). The Winchester Movement Strategy Feasibility Studies Phase 2 summary Report, July

	<p>2021, is the most recent report on the park and ride proposals for the City. The long-term case for a site at the SJMB is re-affirmed despite the report stating that the likely demand scenarios on which the case is based are likely to be lower than the lower range of projected demand.</p> <p>13. There is a lack of detail on how the park and ride scheme would be delivered and of its long-term viability. The Feasibility Studies Phase 2 estimated the cost of two schemes at the SJMB, one for 650 spaces at £6m and a second phase of a further 250 spaces at £2.3m. The consultants commissioned by WCC to consider the viability of the SJMB site, as at September 2022, have not made any provision for the cost of the park and ride in their calculations. There is no indication of how the proposal would be funded and therefore there must be doubt as to the deliverability of the scheme.</p> <p>14. In terms of the number of spaces proposed in Policy W2 and the studies which have informed the allocation there is an inconsistency which should be addressed. If the studies looked at 650-900 why does the policy propose 850?</p> <p>Object to Policy W2. The capacity of the site should be reviewed in the context of the ecological value of the site.</p> <p>Object to Policy W2. There is a lack of detailed policy requirements to guide any future master planning process.</p> <p>Object to Policy W2. The Winchester-Littleton Settlement Gap should be shown on a detailed site allocation plan.</p> <p>Object to Policy W2 to the lack of an accurate graphic presentation of the existing site constraints and extent of previously developed land.</p> <p>Object to Policy W2 and the supporting text which is inconsistent in terms of the description of the extent of previously developed land.</p> <p>Object to Policy W2 and the reliance on a masterplan to provide the detailed planning framework for the site</p> <p>Object to Policy W2 and the proposal for an 850 park and ride scheme, the need for which has not been demonstrated, is not funded and therefore its delivery is uncertain.</p> <p>Object to Policy W2 in its current form it is in conflict with Policies SP2, NE1,NE5,NE7,NE9 and NE14</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<ol style="list-style-type: none"> <li>a. The capacity of the site should be reviewed in the context of the ecological value of the site.</li> <li>b. Include detailed policy requirements to guide any future master planning process.</li> <li>c. The Winchester-Littleton Settlement Gap should be shown on a detailed site allocation plan.</li> <li>d. Remove the reliance on a masterplan to provide the detailed planning framework for the site.</li> </ol>
<p><b>What is your suggested wording or text for the policy?</b></p>	<ol style="list-style-type: none"> <li>a. Correct the supporting text which is inconsistent in terms of the description of the extent of previously developed land.</li> <li>b. Add an accurate graphic presentation of the existing site constraints and the extent of the previously developed land.</li> <li>c. Amend the Policy criteria xix delete reference to 850 spaces and insert new text...’ the precise number of spaces to be provided will be subject to a detailed assessment of the need for spaces’</li> <li>d. Amend the Policy to read 700 dwellings</li> </ol>

	<p>e. Amend the Proposals Map to show the settlement gap and the propose area for housing with no overlap</p> <p>f. Amend the Proposals Map to show the existing and candidate SINC site boundaries</p> <p>g. Amend the Policy to identify the key land-uses for the site.</p> <p>h. Revise the policy as in its current form it conflicts with Policies SP2, NE1, NE5,NE7, NE9 and NE14</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
<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)</a></p>



<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/2/W2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Proposed development at Sir John Moore Barracks must prioritise the retention, management and enhancement of the Flowerdown SINC, while following the mitigation hierarchy to avoid and mitigate the wider fragmentation of the Nature Recovery Network which may result from the regeneration.</p> <p>We welcome clause x which states that proposals should “consider the importance, retention and management of the Flowerdown Site of Importance for Nature Conservation (SINC) in perpetuity by including a management plan for the maintenance and monitoring of these habitats”. The Local Plan must go further to clarify how the designated site will be protected and enhanced within the regeneration project, while addressing recreational pressures of development.</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.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Lucrezia Slinn
<b>Personal reference number</b>	ANON-AQTS-3B4H-A
<b>Full reference number</b>	ANON-AQTS-3B4H-A/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<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-8/2/W2
<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 includes an allocation for 750-1,000 homes at Sir John Moore Barracks. The wording in the Local Plan suggests an indicative number of homes on the site to be 750-1,000 dwellings. This is a significant range with a disparity of between 250 homes. Furthermore, we note that at paragraph 12.15 of the Draft Local Plan the figure of 900 homes is stated for the site, and that this is only a 'working assumption'. The ability of the site to provide either 750 homes or 1,000 homes has a significant impact on the delivery of the spatial strategy of the Local Plan and the potential need to identify further sites for development within the Winchester Town location. It is noted the draft plan includes a buffer beyond the minimum standard method need. However, this buffer is presented for the specific purpose of accommodating unmet needs from neighbouring authorities – rather than to offset the delivery of the lower number of homes from this site. The draft Local Plan sets out a number of constraints within the site, which would impact the overall quantum of deliverable development, which Vistry Partnerships consider include:</p> <ul style="list-style-type: none"> <li>• Need to mitigate against the potential to impact upon the River Itchen Special Area of Conservation (SAC) in terms of nutrients;</li> <li>• Part of the site has high risk of flooding from surface water and groundwater flooding with surface water flooding within the southern part of the site;</li> <li>• Part of the site is located within a settlement gap; and</li> <li>• Site includes the Flowerdown Site of Importance for Nature Conservation (SINC).</li> </ul> <p>In addition, there is a Scheduled Ancient Monument to the west of the site and the 'Development Strategy and Site Selection' document recommends that development is restricted along this boundary. With such a high number of constraints, Vistry Partnerships consider additional detailed work should be carried out to understand how many homes can realistically be accommodated on the site to prevent such a large range in capacity and evidence the site's deliverability and or developable status, and to further ensure the proposed policy is positively prepared (i.e. based on the most up-to-date evidence). The site is currently owned by the Ministry of Defence and is a functioning Military Barracks. The draft Local Plan is silent on whether there is any contamination on the site, which is likely given its current use. The clearance of any contamination has the potential to significantly impact timeframes.</p>

	<p>The draft Plan is clear that brownfield sites are to come forward earlier in the Plan Period, with greenfield sites to come forward at a later stage. It is therefore assumed that this is the assumption for development of the Barracks. The SHLAA notes that “The DIO are working towards having planning permission granted for the redevelopment of the site prior to them de-commissioning the site in 2026”. Assuming the site does benefit from Outline planning permission, completions will not be forthcoming for a number of years. The Lichfield’s research finds that for sites of this nature, from Outline permission to first completion of a house is on average 3 – 4.6 years. At a very high level this means that at the time of granting Outline permission, limited housing will be provided within a five-year period. Based on the assumptions of the SHLAA that Outline permission will be granted in 2026, it is therefore unlikely any meaningful completions will be made before 2030. This demonstrates that WCC will need to rely on medium and smaller greenfield site allocations in the first 5 years of the Plan following adoption rather than such a large scale brownfield site.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Additional work should be undertaken and evidenced to demonstrate how 900 homes can be accommodated on the site alongside the constraints listed above. There is insufficient information at present for those responding to the Local Plan to have any reassurance that 900 homes can be provided on the site: and the timing for the delivery of these units within the plan period.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Additional work should be undertaken and evidenced to demonstrate how 900 homes can be accommodated on the site alongside the constraints listed above. There is insufficient information at present for those responding to the Local Plan to have any reassurance that 900 homes can be provided on the site: and the timing for the delivery of these units within the plan period.</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>	W2
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/2/W2
<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 allocation at St.John Moore Barracks for a residential led mixed use development including 750- 1,000 dwellings is supported. This represents part brownfield site on the edge of Winchester, which includes the delivery of related facilities, services and infrastructure. These are expected to include the creation of neighbourhood centres with ancillary and supporting uses, a park and ride facility, and potentially on-site education provision. The southern part of the allocation is located within the Winchester- Littleton Settlement Gap. This allocation is directly opposite my client's land interests, which are located directly to the south-west on the opposite side of Kennel Lane. The Policy proposes enhancements are anticipated to walking, cycling and bus connectivity to the city centre, railway station and wider locality. All of these would be easily accessible from my client's land interests being approximately 500m distant and could be connected via a dedicated 'green corridor' directly from the site. The ongoing development at Kings Barton to the east, and provision of similar facilities and services, is also relevant given it is also relatively accessible to the site. Consequently, the proximity to these proposed facilities and services will further enhance the sustainability credentials of the site. However, my client would query whether there is sufficient certainty that all of the allocation, particularly the residential parcels, will be delivered within the plan period. It is understood that consultation with the local community and key stakeholders is currently ongoing ahead of the submission of an outline application in Spring 2025.</p> <p>The timescales set out within the consultation web site suggest delivery of new homes from 2027. This is ambitious, and past experience with delivery of housing from large sites such as this will take longer than this : '...sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 to 1.6 years to deliver the first dwelling.' (Start to Finish 3 Lichfields – March 2024 Executive Summary). This would suggest delivery from 2031-32 at the earliest, making it very challenging to delivery up to 1,000 completions by 2040.</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 evidence base re: Land at Harestock Road)</a>

<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Matthew Derham
<b>Personal reference number</b>	ANON-AQTS-323H-S
<b>Full reference number</b>	ANON-AQTS-323H-S/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Michael Bickley
<b>Personal reference number</b>	ANON-AQTS-3BY2-S
<b>Full reference number</b>	ANON-AQTS-3BY2-S/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large number of people living in Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Winchester City Council should re-open (or, preferably, keep open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to re-open (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Michael Coshott
<b>Personal reference number</b>	ANON-AQTS-3BWW-V
<b>Full reference number</b>	ANON-AQTS-3BWW-V/2/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The proposal for W2 and the plan more generally has disregarded the wishes of residents as expressed by a petition, submitted to the City Council and Hampshire County Council, with over 3000 signatures.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The proposal specifically directs that access to the site should be via Andover Road, which the plan also specifically refers to as "one of the key radial routes into the city centre". This disregards the fact that the current plan is to close Andover Road and route traffic (including the increased traffic flow from the Sir John Moore Barracks redevelopment) through residential areas in Kings Barton, Harestock and Weeke. The length of Andover Road should remain open (or be reinstated if subsequently closed) if the Sir John Moore Barracks development is accepted.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to re-open (or keep open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Michael Gannaway
<b>Personal reference number</b>	ANON-AQTS-3BZH-G
<b>Full reference number</b>	ANON-AQTS-3BZH-G/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Closing Andover Road is an unacceptable plan . It would create travel chaos, create a polluting environment through Barton Farm , and would make for a far more dangerous route for residents there.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keep Andover Road open ..... as per the 3200 petitions submitted
<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>	W2
<b>Name of respondent (or client)</b>	Michael Slinn
<b>Personal reference number</b>	ANON-AQTS-3BS3-M
<b>Full reference number</b>	ANON-AQTS-3BS3-M/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy is illegal as it has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, has been ignored in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks re-development.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Miho Finch
<b>Personal reference number</b>	ANON-AQTS-3BBX-8
<b>Full reference number</b>	ANON-AQTS-3BBX-8/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Milan Bogunovic
<b>Personal reference number</b>	ANON-AQTS-3BAR-1
<b>Full reference number</b>	ANON-AQTS-3BAR-1/2/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Not to divert Andover road
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Not to divert Andover road
<b>What is your suggested wording or text for the policy?</b>	Not to divert Andover road
<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>	W2
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/6/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Whilst there has been good collaboration between the ICB and WCC during the Local Plan process, our request is an amendment to the policy as outlined in the full response which has been submitted via email on 08/10/2024. - Whilst there is supporting text for healthcare infrastructure there is no inclusion within the policy that directly supports the need for sufficient healthcare infrastructure. The policy needs an inclusion to contribute to infrastructure
<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>	Yes <a href="#">Letter (commenting on policies)</a>

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



<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Mr Paul Hansell
<b>Personal reference number</b>	ANON-AQTS-3BDF-R
<b>Full reference number</b>	ANON-AQTS-3BDF-R/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Diverting the Andover Road from the straight Roman road is plainly ridiculous
<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>	W2
<b>Name of respondent (or client)</b>	Natalie Hogan
<b>Personal reference number</b>	ANON-AQTS-3BH7-D
<b>Full reference number</b>	ANON-AQTS-3BH7-D/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	There is no mention of the proposed, and unwanted, changes to downgrade Andover Road and re-route it through a much more residential area. A lot is made of the new Park and Ride site which would presumably run the length of Andover Road so surely is key to the proposal.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Keeping Andover Road fully open to all traffic should be listed as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to keep Andover Road fully open on its existing route before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/5/W2
<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>Expected to generate between 225 and 300 primary age pupils. It may be possible to expand one of the local primary schools to serve the development or potentially a new school, subject to walking routes, site constraints, and the distribution of places across existing schools once the development commences. The development would also be expected to generate between 158 and 210 secondary age pupils. It is likely than an expansion of the catchment secondary school (the Henry Beaufort) would be required.</p> <p>Although it has challenging topography and flood risk, the site would be well suited to accommodating a new strategic Park and Ride site and has been identified as a suitable location within the Winchester Movement Strategy Park and Ride feasibility studies. The delivery of a strategic Park and Ride site would intercept and reduce traffic entering Winchester via B3420 Andover Road/Winchester Avenue, helping to ensure that the road would have the capacity needed to accommodate additional trips generated by the development. Winchester Movement Strategy studies suggest that, in combination with the Kings Barton 200 space Park and Ride lite site and other Winchester Movement Strategy improvements, this would result in demand for around 700-750 Park and Ride spaces on the Andover Road corridor by 2030. Further Park and Ride capacity may be required beyond this as further complementary Winchester Movement Strategy traffic reduction, movement and place plan measures and car park capacity reduction measures in the city centre are implemented. It is envisaged that as with all other existing Park and Ride sites, the new Strategic Park and Ride site would be served by an express bus service operating every 10-12 minutes that would connect the site to the city centre and railway station, and potentially to the Royal Hampshire County Hospital site on Romsey Road. It would be important that, as part of the Park and Ride service, the interchange time penalty incurred by Park and Ride users is largely offset by providing faster, reliable journey times into the city centre that save time compared to onward travel by private car. It will also be important that the access strategy for the site facilitates Park and Ride bus service</p>

	<p>access with the minimum journey time penalty. It is recommended that Policy W2 criteria xix is amended to 'The proposals include provision of a Park &amp; Ride facility...' This is to ensure that delivery of the Park &amp; Ride is secured in the policy wording.</p> <p>Ensuring good pedestrian and cycle connections from the site west to Littleton and south to Harestock will be very important, direct delivery or developer contributions should be sought to delivery proposals in the emerging Winchester City LCWIP that identifies links into these key locations from the site and on into the city centre.</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 and evidence base)</a></p>

<b>Policy/Evidence base document</b>	W2
<b>Name of respondent (or client)</b>	Owen Neal
<b>Personal reference number</b>	ANON-AQTS-32GN-K
<b>Full reference number</b>	ANON-AQTS-32GN-K/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>under xvii, Sport England would wish to understand the level and quality of existing sports facilities (indoor and outdoor) and associated ancillary facilities at the Barracks and we would wish to engage in any work to assess the needs for the facilities and consider how they can be retained and maximised for community use. Sport England would wish to protect any playing field in accordance with our statutory role in the planning system, unless any of the exceptions in our playing fields policy apply.</p> <p>The council is currently undertaking work on a new Playing Pitch Strategy which will represent a robust assessment of the council's qualitative and quantitative needs for playing pitches. This will take account of the John Moores barracks site.</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 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>	W2
<b>Name of respondent (or client)</b>	Paul McCulloch
<b>Personal reference number</b>	ANON-AQTS-3BF8-C
<b>Full reference number</b>	ANON-AQTS-3BF8-C/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Peter Finch
<b>Personal reference number</b>	ANON-AQTS-3BPB-Z
<b>Full reference number</b>	ANON-AQTS-3BPB-Z/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Peter Turner
<b>Personal reference number</b>	ANON-AQTS-32TG-S
<b>Full reference number</b>	ANON-AQTS-32TG-S/2/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied
<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>	W2
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/2/W2
<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 W2 requires that detailed proposals accord with the Development Plan and demonstrate how proposals will accord with ...</p> <p>viii. Include direct, safe and lit, active travel links as part of a strategy that minimises car journeys from the development. High quality facilities for walking, cycling and wheeling and public transport that is connected to the surrounding area/ PROW/cycle network in accordance with the Hampshire Movement and Place Framework and Healthy Streets approach. Too much is left to interpretation.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	More specific guidance is needed to ensure potential developers reduce transport emissions to the necessary extent.
<b>What is your suggested wording or text for the policy?</b>	<p>Replace sub-policy viii with</p> <p>viii. Include direct, safe and lit, active travel links as part of a strategy that minimises car journeys from the development. These would provide primary access to all facilities and there should be compliant with LTN 1/20 and at least 10 miles each of cycling/wheeling and walking routes on a site of this size. High quality facilities for walking, cycling and wheeling and public transport that is connected to the surrounding area/ PROW/cycle network in accordance with the Hampshire Movement and Place Framework and Healthy Streets approach; good direct links should be made to bus stops on routes 3, 7, 85/86, and KB1.</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</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>	W2
<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/12/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W2
<b>Name of respondent (or client)</b>	Robert Grant
<b>Personal reference number</b>	ANON-AQTS-32N5-1
<b>Full reference number</b>	ANON-AQTS-32N5-1/1/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I strongly support the housing development at Sir John Moore (Flowerdown) Barracks. Yes, in my back yard! However, building this development, while also closing the existing route of Andover Road from the development into Winchester, seems to be at odds. The re-routed Winchester Avenue will not allow the same width and speed as Andover Road, yet will have to serve a greatly increased number of residents. I recognise that closure of Andover Road is out of the hands of WCC and HCC, as an order of the Secretary of State (Eric Pickles). However, I believe a solution is available, which I propose below.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Comply with the instruction to close Andover Road. Then open it as part of the transport infrastructure serving "King's Barton" (Barton Farm Estate) and Flowerdown. To avoid unnecessary expense, the closure and opening can be co-incident in time, requiring only paperwork.
<b>What is your suggested wording or text for the policy?</b>	Andover Road will technically close, as ordered by the Secretary of State, and simultaneously re-open to serve new housing in Policies W1 and W2.
<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>	W2
<b>Name of respondent (or client)</b>	Robert Slinn
<b>Personal reference number</b>	ANON-AQTS-3BPM-B
<b>Full reference number</b>	ANON-AQTS-3BPM-B/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/8/W2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<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 welcome the inclusion of the criterion below for Policy W2 John Moore Barracks. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider. Southern Water is the statutory wastewater undertaker for the area where this site is allocated. In accordance with this, we undertook an assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposal at the site. The assessment revealed that local sewerage infrastructure in closest proximity to the sites has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.</p> <p>Proposals for the number of dwellings at the site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge, but Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023).</p> <p>This site allocation is in the locality of the SWS Harestock Treatment Works. As such it may be prudent to include the following policy criterion for Policy W2 to supplement vi. of Policy NE6. The development layout must provide sufficient distance between Harestock Wastewater Treatment Works and sensitive land uses,</p>



	<p>such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water. Southern Water endeavours to operate its sewage and sludge treatment works efficiently and in accordance with best practice to prevent pollution. However, unpleasant odours inevitably arise as a result of the treatment processes that occur. New development must be adequately separated from WTWs to safeguard the amenity of future occupiers.</p> <p>In addition, paragraph 7.6.5 of the Kent Waste &amp; Minerals Local Plan 2016 (p106) states that 'certain types of development which require a high quality amenity environment (e.g. residential) may not always be compatible with [...] waste management activities which are industrial in nature.' Policy DM 8 further stipulates ' Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>This site is in the locality of the SWS Harestock Treatment Works. As such it may be prudent to include the following policy criterion for Policy W2 to supplement vi. of Policy NE6.</p> <p>The development layout must provide sufficient distance between Harestock Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The development layout must provide sufficient distance between Harestock Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.</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,</i></p>	<p>Yes  <a href="#">Supporting Document (Commenting on policies)</a></p>

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

<b>Policy/Evidence base document</b>	W2
<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/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Sir John Moore Barracks and Policy W2: The redevelopment of the St John Moore Barracks site should be more limited regarding housing than in this Local Plan and should recognise further the conservation value of this site. I agree with the Littleton & Harestock Parish Council's concerns about the proposed plan to build 175 houses on land to the north of the currently built-on area of the barracks. This has been largely untouched for decades and is currently home to a host of plant, animal and insect life (some rare). This land is currently a candidate to become a Site Important for Nature Conservation (SINC) and I agree with the Parish Council's preferred vision that the northern areas should not be built upon and fragmented, and instead should be conserved and enhanced for nature. Secondly, I understand the need for a Park and Ride, but not in an area designated as countryside when there are other more compelling options in the north of Winchester.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Sir John Moore Barracks and Policy W2: The redevelopment of the St John Moore Barracks site should be more limited regarding housing than in this Local Plan and should recognise further the conservation value of this site. I agree with the Littleton & Harestock Parish Council's concerns about the proposed plan to build 175 houses on land to the north of the currently built-on area of the barracks. This has been largely untouched for decades and is currently home to a host of plant, animal and insect life (some rare). This land is currently a candidate to become a Site Important for Nature Conservation (SINC) and I agree with the Parish Council's preferred vision that the northern areas should not be built upon and fragmented, and instead should be conserved and enhanced for nature. Secondly, I understand the need for a Park and Ride, but not in an area designated as countryside when there are other more compelling options in the north of Winchester.
<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>	W2
<b>Name of respondent (or client)</b>	Steve Heath
<b>Personal reference number</b>	ANON-AQTS-3BQF-5
<b>Full reference number</b>	ANON-AQTS-3BQF-5/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	W2 - Sir John Moore Barracks (Winchester) further impacts the difficulties in travel into the City from the North, on top of the proposed closure to through traffic of the Andover Road resulting from the Barton Farm development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Retain the Andover Road as a through route, provide a Park and Ride facility when coming from the North of Winchester and ensure access/egress for the 2 new sites on the A272 are both safe and efficient.
<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>	W2
<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/1/W2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We raise significant concerns in relation to allocating this site for development. Firstly, there is no certainty that the site is available, and can be developed out in the quantities envisaged (900 houses), in the plan period. There is a long history associated with this site, in terms of the sites' availability for redevelopment. The plan is silent on the timescales for the site to be available, nor any contingency in the event of a phased release and how this might interface with a residential led redevelopment given, for example, there is only a single vehicular access point serving the site. Self-evidently, ongoing MOD operations and civilian construction and operation traffic are incompatible. The latest evidence is that the site will be available from 2024, however this is not a binary date, and the plan will be submitted before the site is vacated and available – any delay in availability cannot be integrated in to the plan. This is a serious risk.</p> <p>Secondly, the development quantum is as yet untested. There is no detailed heritage assessment for the site, it is not clear what net development zones are appropriate, and as a result yield could significantly reduce. As drafted Policy W2 leaves a significant amount of assessment work to the planning application stage, when in fact this is key evidence base assessment work to inform the extent to which features need to be retained and incorporated, and in turn the implications for development yield. We are aware of numerous examples where existing above and below ground heritage assets on MOD land have significantly limited the extent of redevelopment. At present we consider it premature to include this site in the plan, pending full assessment of a range of issues.</p> <p>Thirdly, we do not consider that a residential led scheme is appropriate for this site, a view shared by key stakeholders such as the local MP. The nature of the site, and former operations, lend themselves to a knowledge-based employment led proposal, in favour of the residential led proposal being planned for. Good examples of this approach can be seen at Bicester Heritage and Upper Heyford (both Cherwell District) where former MOD land has been put to high technology new employment uses, building upon the heritage of the site and incorporating above and below ground heritage assets. Such an approach needs to be considered carefully for this site.</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 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>	W2
<b>Name of respondent (or client)</b>	Susan Falconer
<b>Personal reference number</b>	ANON-AQTS-32M1-V
<b>Full reference number</b>	ANON-AQTS-32M1-V/1/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Paragraph 12.25 Currently states 'Gym and leisure facilities, including a swimming pool and a nursery which is used occasionally by the local community as well as military personnel'. 'Occasional use' is incorrect. Club records show Winchester City Penguins Swimming Club has been hiring the facility regularly since 2016 (except during covid closures), for 9-10.5 hours over 3 days a week.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	A modification to ensure the correct information is given, amended to say regular community use.
<b>What is your suggested wording or text for the policy?</b>	. Gym and leisure facilities, including a nursery and a swimming pool which is used regularly by the local community swimming club three days a week, as well as military personnel.
<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>	W2
<b>Name of respondent (or client)</b>	Susan Ramsden
<b>Personal reference number</b>	ANON-AQTS-3BEG-T
<b>Full reference number</b>	ANON-AQTS-3BEG-T/2/W2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<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>	W2
<b>Name of respondent (or client)</b>	Tessa Greenhalgh
<b>Personal reference number</b>	ANON-AQTS-323S-4
<b>Full reference number</b>	ANON-AQTS-323S-4/2/W2
<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 my answers previously as regards Andover Road closure: 12.11 - The downgrading of Andover Road. This plan is not sound because it is not positively prepared nor justified, and it is questionable as to whether it is effective or consistent with national policy. It is not positively prepared or justified. I am unaware of any evidence it meets the area's objectively assessed needs, the main area affected (Kings Barton) not in existence at the time the decision was made. Andover road is the major route from the North into Winchester and could be improved upon for the benefit of pedestrians, cyclists and other users. There is little justification to divert it through a residential area. In fact there are several potential disadvantages in doing so, in addition to cost including</p> <ul style="list-style-type: none"> <li>• the increased casualty risks</li> <li>• the increased severance of the Kings Barton residents' community</li> <li>• the increase in air and noise pollution for residents</li> <li>• the overall increase in travellers' carbon emissions</li> <li>• the increased traffic delays for travellers including Winchester City Council residents</li> <li>• the increased movement of traffic through other residential areas in Winchester to avoid delays on</li> </ul> <p>Winchester Avenue</p> <p>The simplest and most desirable outcome to the majority of residents (as per multiple petitions including one recently of over 3000 signatures) is to leave Andover Road open with appropriate improvements, which is in keeping options within the WSP Andover Road Corridor report of 2023. This plan is unlikely to be effective given that many of the occupancy deadlines have not been met by Cala Homes and the completion of Winchester Avenue is potentially also going to be delayed. With the upcoming M3 junction 9 works, it is imperative that Andover Road be kept open to allow for additional traffic taking alternative routes.</p> <p>National policy in this area suggests a move towards reducing traffic in local areas rather than diverting major roads through residential estates. For example, the Department for Transport 'Public Opinion Survey on Traffic and Road Use' of 2020 suggests the majority support the reduction of traffic in their neighbourhood and subsequently there has been a move towards realising this goal, for example in 'Implementing low traffic neighbourhoods' of 2024.</p>

	<p>The decision to close Andover road to through-traffic was made many years ago, prior to the Kings Barton estate being built. This is now out-of-date and not in keeping with current opinion, local needs or national policy. It should be reversed, which could, for example, be done so as a condition of the development of Sir John Moore Barracks, which will also increase the traffic on Andover Road. As one of many mothers with young children on this estate, scared for her children's health and safety, I implore the council to reconsider this decision.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<ol style="list-style-type: none"> <li>1. Should follow objective needs of local area and be justified through consideration of reasonable alternatives based on evidence</li> <li>2. Should be in keeping with national policies aimed at reduced traffic in residential areas</li> </ol>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The Andover Road closure will be reconsidered in light of the development plans for Sir John Moore Barracks. Improvements to the road and specific junctions will be undertaken with the aim to keep Andover Road open to all through traffic.</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>	W2
<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/2/W2
<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 W2 – Sir John Moore Barracks is the most significant new allocation proposed at Winchester Town within the Draft Local Plan, with a dwelling capacity assumption of 900 homes applied; it is placed third in the hierarchy of contributions to housing delivery at the town behind the residual component of Barton Farm (1,541 dwellings) and the windfall allowance (1,035 dwellings). However, there remain uncertainties surrounding the availability of the site and its potential capacity, as demonstrated by the terms of the draft policy. Such uncertainties limit the potential of the site to make a meaningful contribution to housing land supply in the early years of the plan period and therefore to make any meaningful contribution to achieving a robust five-year housing land supply. In identifying this site as the only new major planned component of housing supply at the principal and most sustainable settlement in the district, the Council is inviting a significant risk factor into the deliverability of its entire housing strategy. In the context of a pressing affordability crisis, a declared climate emergency driven in large part locally by transport related carbon emissions, the Council should be pursuing a robust, certain, strategically-scaled policy response that is able to guarantee continuous housing delivery. Instead, the Council has chosen to identify an operational military facility as the only new strategic residential site at Winchester. The site was identified initially following a review of the Defence Estate that took place in November 2016 aimed at significantly rationalising and reducing the scale of military infrastructure arising out of the 2015 Strategic Defence and Security Review (SDSR). Much has changed in the period since these studies were commissioned.</p> <p>In November 2016 it was estimated that the Sir John Moore site would be vacated in 2021. That date has now been revised to 2026, with the House of Commons database relating to the disposal programme for the Defence Estate currently describing the status of the site as being under ‘assessment’. The team acting for the DIO promoting the site as a development opportunity forecast in December 2020 that a planning application for redevelopment would be made in 2021, with on-site delivery occurring from 2022. This timetable has clearly been superseded. The DIO project website now indicates that the site is due to be vacated in 2026, although any reference to a timetable for a planning application has been removed. A</p>

conceptual sketch masterplan (Stage 3) (September 2024) shows the current position. There is high level supporting information but limited clarity as to the precise nature of the development that is planned.

The reliance placed on this site as the only new strategic residential allocation at Winchester within the 2040 Plan is disproportionate. If the plan to vacate the facility remains in place the site provides a realistic growth opportunity. However, should the decision to decommission the base be revisited the opportunity is called into question. Plan-making should provide certainty and should be based on policies that are 'unambiguous', on which basis there should be clarity when sites are identified that they will be both available for development and able to contribute as expected in a timely manner in the prosecution of the strategy upon which the plan is based. When such sites are intended to perform as the main strategic residential allocation at the principal settlement, it is reasonable to expect that the land will be available. This level of certainty is not achieved in respect of the Sir John Moore Barracks site. The Council should not be relying on this site as the key new component of its housing strategy for Winchester Town. Questions about the availability of the site apart there are other significant factors that compound this view when the supporting text to the draft policy is scrutinised.

Attention is drawn particularly to several factors identified by the Council – see full response. The characteristics that are highlighted show that the opportunity that exists for development is far from certain; most importantly in terms of the availability of the site for development at all, the timetable for the departure of military personnel being unclear; and in respect of the potential of the site to provide a cohesive, integrated, and well-connected neighbourhood that respects its sensitive setting. The characteristics that apply to the site, notably its high degree of containment and separation from surrounding land, suggests that it would be extremely difficult to integrate new homes and facilities with neighbouring development, without dramatically altering the landscape setting of the site (a factor afforded significance in initially selecting the site for development). Development would also undoubtedly compromise the integrity of the settlement gap between Littleton and Harestock protected under the terms of Policy NE7. In this regard the Littleton Gap is a long-established policy tool carried forward through successive plans that would be greatly compromised if the site is comprehensively developed.

The range of sensitivities and uncertainties highlighted within the supporting text to the policy demonstrate that the level of reliance placed on the Sir John Moore Barracks site is premature at this stage. While there may be future development potential, the Council should not be relying on the site as the core new component of its housing strategy for Winchester Town. Noting the lack of clarity surrounding the future of the military facility it would be more robust to treat it as a potential opportunity/contingency site, the potential of which should be treated as uncertain in the context of a defined allocations strategy. Should the status of the site become clear during the plan period, it could be developed as a parcel of (partially) previously developed land that is an adjunct to the housing strategy for the Winchester Town area. Vistry and Taylor Wimpey

	<p>recognise that if the site becomes available for development during the plan period, it would be appropriate to investigate its potential for supplementary residential, or other alternative non-military uses as part of the development of a new northern neighbourhood for Winchester, subject to the multiple constraints identified by the Draft plan being successfully resolved.</p> <p>However, it is not appropriate to treat the site as the main new strategic development opportunity that underpins the housing strategy of the new Local Plan. The land controlled by Vistry and Taylor Wimpey to the north of Wellhouse Lane is suitable, available, and achievable in the context of the proposed plan period and, in accordance with submissions made at Regulation 18 stage, would provide a more certain strategic development opportunity on which the spatial strategy of the Local Plan could be based. The numerous caveats applied to the draft policy show that this is an entirely reasonable and proportionate conclusion to draw.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The allocation should be reclassified as a reserve/contingency allocation to be brought forward only once the availability of the site and the capacity and potential of the land are clearly understood. It should not be relied upon as a key (new) component of the housing strategy for Winchester Town in absence of the clarity required to confirm its availability and true development potential.</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>

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

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

[Proposed Modifications](#) agreed with Historic England regarding the wording of paragraph 12.37 and the wording of criterion xiv in Policy W2.

[Proposed Modification](#) agreed with the HIOW ICB regarding addition of wording in criterion ii of Policy W2.

Local Plan Reference or document	Policy W3 St Peter's Car Park	
Total Number of Representations received.	13	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	10	1
Sound	8	3
Complies with Duty to Cooperate	9	2
<p><b>Summary of Representations</b></p> <p>The key concern regarding the planned redevelopment of St Peter's car park for residential development revolve around access and mobility, balancing the need for sufficient city centre car parking for residents and supporting city vitality against the pressure and the need for housing development. Respondents raised concern regarding environmental concerns which focused on flooding and maintaining ecological balance, with calls for appropriate flood mitigation strategies. This coincides with comments indicating that there were mixed feelings about the re-development of the site for housing against the need for social housing.</p> <p>Economic and educational impacts were raised along with the importance of maintaining the site as a car park to support local businesses and educational institutions. Concerns were also raised about infrastructure and the need to maintain access to essential underground utilities.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/4/W3</p> <p>ANON-AQTS-3BS3-M/3/W3</p> <p>ANON-AQTS-3BJD-V/3/W3</p> <p>ANON-AQTS-3BSY-T/39/W3</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/13/W3</b></p> <p>ANON-AQTS-3299-G/8/W3</p> <p><b>ANON-AQTS-32UK-X - Environment Agency/10/W3</b></p> <p><b>ANON-AQTS-327U-A - Southern Water/16/W3</b></p> <p>ANON-AQTS-327Q-6/1/W3</p> <p>ANON-AQTS-3B8M-K/8/W3</p> <p>BHLF-AQTS-3264-8/2/W3</p> <p>BHLF-AQTS-32Y6-D/1/W3</p> <p><b>BHLF-AQTS-328R-8 - Hampshire County Council/11/W3</b></p>		
Main issues raised in representations received in regulation 19 consultation.		



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

<b>Policy/Evidence base document</b>	W3
<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/10/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We are supportive of point xiii. regarding de-culverting of the watercourse. De-culverting can provide wider benefits to people, wildlife and the environment and is actively encouraged in paragraph 064 of the Planning Practice Guidance for Flood risk and coastal change. The site has a small area of Flood Zone 3b (functional floodplain) at the northern boundary according to Winchester District Council's Level 2 Strategic Flood Risk Assessment (July 2024). In accordance with Table 2 of the Planning Practice Guidance for Flood risk and coastal change, there should not be any inappropriate development within Flood Zone 3b. Ideally, this would be stated within the policy (we suggest within point x.).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We are supportive of point xiii. regarding de-culverting of the watercourse. De-culverting can provide wider benefits to people, wildlife and the environment and is actively encouraged in paragraph 064 of the Planning Practice Guidance for Flood risk and coastal change. The site has a small area of Flood Zone 3b (functional floodplain) at the northern boundary according to Winchester District Council's Level 2 Strategic Flood Risk Assessment (July 2024). In accordance with Table 2 of the Planning Practice Guidance for Flood risk and coastal change, there should not be any inappropriate development within Flood Zone 3b. Ideally, this would be stated within the policy (we suggest within point x.).
<b>What is your suggested wording or text for the policy?</b>	Wording to be added to point x. "no inappropriate development shall take place within Flood Zone 3b (functional floodplain)"
<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>	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>	W3
<b>Name of respondent (or client)</b>	Bob Bacciarelli
<b>Personal reference number</b>	BHLF-AQTS-32Y6-D
<b>Full reference number</b>	BHLF-AQTS-32Y6-D/1/W3
<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 city council website has closed this for comment but I would still like to make my voice heard on this matter. I have been a long resident at 28 Northwalls which is one of the properties along Trinity Terrace opposite Holy Trinity church. I refer to your stated intention to develop St. Peters Carpark for residential building development. I think that it would be a shame to lose the carpark given that it services central winchester as well as the nursery and St. Bede's school in Gordon Road.</p> <p>However, if it were to be developed I would like the following be taken into consideration.</p> <p>Trinity Terrace nos. 24 to 32 have had access via Gordon Rd and then through St. Peters carpark for past 36 years (as long as I have lived there) to park on our property at the back of our gardens. The residents including myself depend on this access and we therefore request that this be included in the development plan for this location. Therefore we would request that any future plans for the car park continue to allow for access to our back garden car parking and that the residential development internal road system be designed to allow for this. I hope that you can take this into account and should you wish to discuss I am happy to visit your offices or discuss over the phone or via email. Thank you for your consideration of my submitted input and I look forward to this being incorporated in any future development.</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 may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Image (Photo of St Peter's car park)</a>

<b>Policy/Evidence base document</b>	W3
<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/3/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	W3. St Peter's Car Park in Winchester is needed to encourage tourists, shoppers, new jobs, city activity & for St Bede's school. Don't build there. There is also continuing flood risk there, & more waste water risk. Driving East from City Road it is the only car park without being swept into the one-way system.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	W 3. Don't build on St Peter's car park. Even if dwellings were for non-drivers, they would still need parking for trade deliveries, utility care, visitors & emergency care etc. Private cars must be able to park in the city if it is to flourish.
<b>What is your suggested wording or text for the policy?</b>	W3. St Peter's car park is needed as it is, & should not be built on, especially with continuing flood risk. If visitors and shoppers cannot park in the city they will not come, which would be bad for the economy.
<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>	W3
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/4/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Very sensible proposal to get more housing in the city centre and encourage use of park and ride for visitors so let's get on with it asap.
<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>	W3
<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/8/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.



<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>	W3
<b>Name of respondent (or client)</b>	Judith Martin
<b>Personal reference number</b>	BHLF-AQTS-3264-8
<b>Full reference number</b>	BHLF-AQTS-3264-8/2/W3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Lastly, to be positive for once, I welcome W3, St Peter's Car Park, with its proposal for housing. This was actually promised at least 20 years ago, when Park &amp; Ride was first introduced, the idea being that as P&amp;R came in, so city car parks would be closed and built on. St Peter's was to be the first. So this is long overdue. I note that on p. 325 the plan is for 30 houses, and on p. 220 it says 40. The car park has many of the same issues as the RPLC site, i.e. it is surrounded by water and flood-prone. However, it is currently all tarmac, so using half the area for housing and half for flood mitigation would provide a pleasant setting and good landscaping. The housing, I sincerely hope, will be social and genuinely affordable which is what Winchester most needs.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove W5 and W10, replace the text of W9 with the 2017 Highcliffe Community Plan, and make sure W3 is developed with social housing and not left at the mercy of developers.
<b>What is your suggested wording or text for the policy?</b>	This is not my job, to reword the Winchester Local Plan. My requests for change are as above.
<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.</i>	Yes <a href="#">Form (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	W3
<b>Name of respondent (or client)</b>	Michael Slinn
<b>Personal reference number</b>	ANON-AQTS-3BS3-M
<b>Full reference number</b>	ANON-AQTS-3BS3-M/3/W3
<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>	
<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>	W3
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/13/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The ICB supports the current policy statements.
<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)</a>

<b>Policy/Evidence base document</b>	W3
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/11/W3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	The predicted numbers generated by this development are unlikely to have a significant impact on the local primary or secondary schools.
<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)</a>

<b>Policy/Evidence base document</b>	W3
<b>Name of respondent (or client)</b>	New Homes Team
<b>Personal reference number</b>	ANON-AQTS-327Q-6
<b>Full reference number</b>	ANON-AQTS-327Q-6/1/W3
<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 supported, and it is advised that the site is still in the Winchester City Council General Fund but that the site will be developed as per the 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>Policy/Evidence base document</b>	W3
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/8/W3
<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 the closure of public car parks .
<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>	W3
<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/39/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W3
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/16/W3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We welcome the inclusion of the criterion below for the following policies: W3 Peters Car Park. Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes. This is because our initial assessment of this site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.
<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="#">Supporting Document (Commenting on policies)</a>

*may contain additional details,  
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](#) agreed with Historic England regarding the wording of paragraph 12.37 and the wording of criterion iii in Policy W3.

[Proposed Modifications](#) agreed with the Environment Agency regarding criterion x in Policy W3

<b>Local Plan Reference or document</b>	Policy W4 Land West of Courtenay Road	
<b>Total Number of Representations received.</b>	82	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	12	63
<b>Sound</b>	6	70
<b>Complies with Duty to Cooperate</b>	64	11
<p><b>Summary of Representations</b></p> <p>Concerns were raised about the insufficient provision of open spaces and community amenities, including parks and allotments, which they argue exacerbates existing shortfalls. The redevelopment of this site for residential development is not considered to comply with the national planning policies, such as greenfield site protection and biodiversity conservation.</p> <p>Respondents were particularly concerned about priority species and wildlife corridors, bats and called for an ecological assessment. There were calls for the site to be safeguarded as accessible green space that is protected from housing development. Concerns were also raised about increased traffic through an existing residential area, insufficient parking which poses a risk to safety and neighbourhood tranquillity.</p> <p>The impact of this proposed development on local infrastructure and services (schools, healthcare and public transport) was also raised. The need to provide active travel links from this site to Kings Barton. There were other comments that the phasing of development needs to be adjusted to address urgent housing needs better.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/7/W4  ANON-AQTS-3B1H-7/1/W4  ANON-AQTS-3BEA-M/1/W4  ANON-AQTS-3BQR-H/1/W4  ANON-AQTS-3B8K-H/1/W4  ANON-AQTS-3BRS-K/1/W4  ANON-AQTS-3BRN-E/1/W4  ANON-AQTS-3BJ7-F/1/W4  ANON-AQTS-3BJA-S/1/W4  ANON-AQTS-3BJD-V/6/W4  ANON-AQTS-3BPE-3/1/W4  ANON-AQTS-3BSY-T/79/W4  ANON-AQTS-3BPZ-R/1/W4</p>		

ANON-AQTS-3B4Z-V/1/W4

ANON-AQTS-3B4A-3/1/W4

ANON-AQTS-3B4S-N/1/W4

**ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/29/W4**

ANON-AQTS-3BB3-3/1/W4

ANON-AQTS-3BBS-3/1/W4

ANON-AQTS-3279-E/1/W4

ANON-AQTS-329D-U/1/W4

ANON-AQTS-3299-G/17/W4

ANON-AQTS-32GJ-F/1/W4

ANON-AQTS-32UW-A/1/W4

ANON-AQTS-32U6-9/1/W4

ANON-AQTS-32N5-1/2/W4

ANON-AQTS-32S9-A/1/W4

ANON-AQTS-32S4-5/1/W4

ANON-AQTS-32SJ-U/11/W4

ANON-AQTS-32FV-T/1/W4

ANON-AQTS-3237-8/1/W4

ANON-AQTS-323P-1/1/W4

ANON-AQTS-322U-5/1/W4

ANON-AQTS-322J-T/1/W4

ANON-AQTS-32MF-H/1/W4

ANON-AQTS-32M3-X/1/W4

ANON-AQTS-32M7-2/1/W4

ANON-AQTS-32MH-K/1/W4

ANON-AQTS-32MR-W/1/W4

ANON-AQTS-32MK-P/2/W4

ANON-AQTS-32ZQ-9/1/W4

ANON-AQTS-32ZC-U/1/W4

ANON-AQTS-32ZA-S/1/W4

ANON-AQTS-32Z5-D/1/W4

ANON-AQTS-32K8-1/1/W4

ANON-AQTS-32MS-X/1/W4  
ANON-AQTS-3B1Q-G/1/W4  
ANON-AQTS-32HP-P/1/W4  
ANON-AQTS-32H6-V/1/W4  
BHLF-AQTS-32EQ-M/1/W4  
BHLF-AQTS-32EZ-W/1/W4  
BHLF-AQTS-32E3-P/1/W4  
BHLF-AQTS-32E7-T/1/W4  
BHLF-AQTS-32EV-S/1/W4  
BHLF-AQTS-32EW-T/1/W4  
BHLF-AQTS-32EX-U/1/W4  
BHLF-AQTS-32E6-S/1/W4  
BHLF-AQTS-32E4-Q/1/W4  
BHLF-AQTS-32EM-G/1/W4  
BHLF-AQTS-32EG-A/1/W4  
BHLF-AQTS-32EN-H/1/W4  
BHLF-AQTS-32E5-R/1/W4  
BHLF-AQTS-326F-T/1/W4  
BHLF-AQTS-3261-5/1/W4  
BHLF-AQTS-326T-8/1/W4  
BHLF-AQTS-326D-R/1/W4  
BHLF-AQTS-326Q-5/1/W4  
BHLF-AQTS-326Z-E/1/W4  
BHLF-AQTS-326C-Q/1/W4  
BHLF-AQTS-3263-7/2/W4  
BHLF-AQTS-326P-4/6/W4  
BHLF-AQTS-326M-1/1/W4  
BHLF-AQTS-326N-2/1/W4  
BHLF-AQTS-32YD-U/1/W4  
BHLF-AQTS-32YZ-H/1/W4  
BHLF-AQTS-32Y2-9/1/W4  
BHLF-AQTS-32YA-R/1/W4

BHLF-AQTS-32YP-7/1/W4

BHLF-AQTS-32YU-C/1/W4

BHLF-AQTS-328F-V/1/W4

**BHLF-AQTS-328R-8 - Hampshire County Council/27/W4**

BHLF-AQTS-32QQ-Z/11/W4

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

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



<b>Policy/Evidence base document</b>	<b>W4 – there were a number of identical representation on this site so as they are exactly the same content they have in this instance, been grouped together. The name of the representor has been manually copy and pasted in brackets after the representation number.</b>
<b>Name of respondent (or client)</b>	<b>Please see below as all of the names of the respondents have been listed after the ID number</b>
<b>Personal reference number</b>	ANON-AQTS-322U-5 (Alison Martin) BHLF-AQTS-32E3-P (Alison Moore) BHLF-AQTS-326N-2 (Andy and Nikki Carlisle) ANON-AQTS-32MF-H ANON-AQTS-32MF-H (Ann and Dale Greenwood) BHLF-AQTS-32YP-7 (Caesar Slattery) ANON-AQTS-32MS-X (Caroline Bickerton) ANON-AQTS-329D-U (Charlotte Mclver) BHLF-AQTS-32E5-R (Chloe Wilk) ANON-AQTS-322J-T (Chris Poulter) BHLF-AQTS-32EW-T (Chris Wilk) ANON-AQTS-3BJD-V (Christopher Edouard Pasche) ANON-AQTS-3237-8 (Christopher John Stock) ANON-AQTS-3BPZ-R (Claire Sclater) BHLF-AQTS-326Z-E (David Francis Adey) ANON-AQTS-3BBS-3 (David hurrell) ANON-AQTS-32MH-K (Delphine Granger) BHLF-AQTS-326F-T (Ed Dolman) BHLF-AQTS-328F-V (Edward Roberts) BHLF-AQTS-32E6-S (Eleanor Marion Williams) ANON-AQTS-32M7-2 (Emma Borton-Oneile) BHLF-AQTS-326C-Q (Geraldine Edith Bracey) BHLF-AQTS-32EG-A (Gillian Bardsley) ANON-AQTS-3BRN-E (Gillian Bourke) ANON-AQTS-32S4-5 (Hilary Riddell) ANON-AQTS-32Z5-D (James Cronk) ANON-AQTS-3BRS-K (Jane Parrett) BHLF-AQTS-32EQ-M (Jeanette Faulkner) ANON-AQTS-32HP-P (Jennifer Beacher) ANON-AQTS-3279-E (Jenny Hurrell) ANON-AQTS-32M3-X (John Borton) BHLF-AQTS-32E4-Q (John ramage) ANON-AQTS-3B4A-3 (Jolyon Connell)

	<p>ANON-AQTS-3BJ7-F (Julia Powell)  ANON-AQTS-3BB3-3 (Julian Paul English)  ANON-AQTS-3BJA-S (Justyn Powell)  BHLF-AQTS-32EM-G (Kate Bush)  BHLF-AQTS-326D-R (Linda Mackenzie)  BHLF-AQTS-32YU-C (Lorna and Eoin McNeill)  BHLF-AQTS-32EX-U (Louise West)  ANON-AQTS-32MK-P (Lucy Hall)  ANON-AQTS-32ZQ-9 (Maria Robertson)  ANON-AQTS-323P-1 (Marie Stock)  ANON-AQTS-3B1Q-G (Marion Rose Poulter)  ANON-AQTS-32U6-9 (Mark Irving)  BHLF-AQTS-32EZ-W (M-G Coyle)  ANON-AQTS-32UW-A (Michael John Robertson)  BHLF-AQTS-326Q-5 (Mrs Julia Adey)  ANON-AQTS-32GJ-F (Naomi Irving)  BHLF-AQTS-3261-5 (Nicola Dolman)  ANON-AQTS-3B4S-N (Nigel Greenwood)  ANON-AQTS-32H6-V (Nikki Prentice-Jones)  ANON-AQTS-32K8-1 (Paul Bickerton)  ANON-AQTS-32S9-A (Paul Riddell)  BHLF-AQTS-32EV-S (Sally Rowena Pasche)  BHLF-AQTS-32EN-H (Samantha Griffiths)  BHLF-AQTS-326M-1 (Sophie Butt)  BHLF-AQTS-326T-8 (Stephanie Jacques)</p>
<p><b>Full reference number</b></p>	<p>ANON-AQTS-322U-5/1/W4 (Alison Martin)  BHLF-AQTS-32E3-P/1/W4 (Alison Moore)  BHLF-AQTS-326N-2/1/W4 (Andy and Nikki Carlisle)  ANON-AQTS-32MF-H/1/W4 (Ann and Dale Greenwood)  BHLF-AQTS-32YP-7/1/W4 (Caesar Slattery)  ANON-AQTS-32MS-X/1/W4 (Caroline Bickerton)  ANON-AQTS-329D-U/1/W4m (Charlotte McIver)  BHLF-AQTS-32E5-R/1/W4 (Chloe Wilk)  ANON-AQTS-322J-T/1/W4 (Chris Poulter)  BHLF-AQTS-32EW-T/1/W4 (Chris Wilk)  ANON-AQTS-3BJD-V/6/W4 (Christopher Edouard Pasche)</p>

ANON-AQTS-3237-8/1/W4 (Christopher John Stock)  
ANON-AQTS-3BPZ-R/1/W4 (Claire Sclater)  
BHLF-AQTS-326Z-E/1/W4 (David Francis Adey)  
ANON-AQTS-3BBS-3/1/W4 (David hurrell)  
ANON-AQTS-32MH-K/1/W4 (Delphine Granger)  
BHLF-AQTS-326F-T/1/W4 (Ed Dolman)  
BHLF-AQTS-328F-V/1/W4 (Edward Roberts)  
BHLF-AQTS-32E6-S/1/W4 (Eleanor Marion Williams)  
ANON-AQTS-32M7-2/1/W4 (Emma Borton-Oneile)  
BHLF-AQTS-326C-Q/1/W4 (Geraldine Edith Bracey)  
BHLF-AQTS-32EG-A/1/W4 (Gillian Bardsley)  
ANON-AQTS-3BRN-E/1/W4 (Gillian Bourke)  
ANON-AQTS-32S4-5/1/W4 (Hilary Riddell)  
ANON-AQTS-32Z5-D/1/W4 (James Cronk)  
ANON-AQTS-3BRS-K/1/W4 (Jane Parrett)  
BHLF-AQTS-32EQ-M/1/W4 (Jeanette Faulkner)  
ANON-AQTS-32HP-P/1/W4 (Jennifer Beacher)  
ANON-AQTS-3279-E/1/W4 (Jenny Hurrell)  
ANON-AQTS-32M3-X/1/W4 (John Borton)  
BHLF-AQTS-32E4-Q/1/W4 (John ramage)  
ANON-AQTS-3B4A-3/1/W4 (Jolyon Connell)  
ANON-AQTS-3BJ7-F/1/W4 (Julia Powell)  
ANON-AQTS-3BB3-3/1/W4 (Julian Paul English)  
ANON-AQTS-3BJA-S/1/W4 (Justyn Powell)  
BHLF-AQTS-32EM-G/1/W4 (Kate Bush)  
BHLF-AQTS-326D-R/1/W4 (Linda Mackenzie)  
BHLF-AQTS-32YU-C/1/W4 (Lorna and Eoin McNeill)  
BHLF-AQTS-32EX-U/1/W4 (Louise West)  
ANON-AQTS-32MK-P/2/W4 (Lucy Hall)  
ANON-AQTS-32ZQ-9/1/W4 (Maria Robertson)  
ANON-AQTS-323P-1/1/W4 (Marie Stock)  
ANON-AQTS-3B1Q-G/1/W4 (Marion Rose Poulter)  
ANON-AQTS-32U6-9/1/W4 (Mark Irving)  
BHLF-AQTS-32EZ-W/1/W4 (M-G Coyle)  
ANON-AQTS-32UW-A/1/W4 (Michael John Robertson)  
BHLF-AQTS-326Q-5/1/W4 (Mrs Julia Adey)  
ANON-AQTS-32GJ-F/1/W4 (Naomi Irving)

	<p>BHLF-AQTS-3261-5/1/W4 (Nicola Dolman)  ANON-AQTS-3B4S-N/1/W4 (Nigel Greenwood)  ANON-AQTS-32H6-V/1/W4 (Nikki Prentice-Jones)  ANON-AQTS-32K8-1/1/W4 (Paul Bickerton)  ANON-AQTS-32S9-A/1/W4 (Paul Riddell)  BHLF-AQTS-32EV-S/1/W4 (Sally Rowena Pasche)  BHLF-AQTS-32EN-H/1/W4 (Samantha Griffiths)  BHLF-AQTS-326M-1/1/W4 (Sophie Butt)  BHLF-AQTS-326T-8/1/W4 (Stephanie Jacques)</p>
<b>Legally compliant?</b>	No
<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>LEGAL FAILING: FAILURE TO PROTECT THE LAND FROM DEVELOPMENT IN ACCORDANCE WITH A 2012 COMMITMENT BY THE PLANNING INSPECTOR</p> <p>Within the 2012 planning decision for the Barton Farm development, the Planning Inspector (acting for Secretary of State for Communities &amp; Local Government) committed to protecting as open space the land east of the railway line. The land within Policy W4 is covered by this commitment. The letter dated 2nd October 2012 is available here:  <a href="https://www.google.com/url?sa=t&amp;rct=j&amp;q=&amp;esrc=s&amp;source=web&amp;cd=&amp;ved=2ahUKEwjgh8fwms_7AhURWcAKHYd9AI0QFnoECBoQAQ&amp;url=https%3A%2F%2Fwww.winchester.gov.uk%2Fassets%2Fattach%2F3510%2F12-10-02-Barton-Farm-Redet-Combined.pdf&amp;usg=AOvVaw3OiSf6AMoBBU4DDm8k3nFf">https://www.google.com/url?sa=t&amp;rct=j&amp;q=&amp;esrc=s&amp;source=web&amp;cd=&amp;ved=2ahUKEwjgh8fwms_7AhURWcAKHYd9AI0QFnoECBoQAQ&amp;url=https%3A%2F%2Fwww.winchester.gov.uk%2Fassets%2Fattach%2F3510%2F12-10-02-Barton-Farm-Redet-Combined.pdf&amp;usg=AOvVaw3OiSf6AMoBBU4DDm8k3nFf</a> It states at Paragraph 396:  “It is also proposed that land to the east of the railway line, which is controlled by the Appellant [CALA], will be used for informal recreation and dog walking and managed as a biodiversity area. The implementation and management of this area would be controlled through a planning condition and the provision for public access across this land is dealt with in one of the Planning Obligations.” In its response to the Regulation 18 consultation feedback on Policy W4, Winchester City Council denies that this commitment applies. The document is available here: <a href="https://www.localplan.winchester.gov.uk/assets/attach/296/W4-Consultation-comments-on-W4.pdf">https://www.localplan.winchester.gov.uk/assets/attach/296/W4-Consultation-comments-on-W4.pdf</a> The Winchester City Council response notes the points raised, but concludes:  “While this area of land is within the control of the developers of Barton Farm [CALA], it is not included in the S106 Agreement requirement for land to the east of the railway to be provided for biodiversity in conjunction with the development of Kings Barton. That requirement has been met by the provision of Barton Meadows.” Winchester City Council’s response to the Regulation 18 consultation fails to address the central point: that in 2012 the Planning Inspector committed that the land east of the railway line which is controlled by CALA</p>

should be protected. This commitment very clearly extends to the entire area of CALA's land east of the railway line. The commitment did not state that it applied to only part of CALA's land east of the railway line. Winchester City Council is therefore wrong to assert that that commitment has been discharged through the creation of Barton Meadows nature reserve. The land identified under Policy W4 must also be preserved as open space. Further evidence that the Secretary of State's protection includes the land in Policy W4 is given in Winchester City Council's Open Space Assessment, available here:

<https://www.winchester.gov.uk/community-recreation/open-spaces/open-space-strategy>

The Assessment is a background paper to the emerging Local Plan and is used by Winchester City Council as an evidence base to ascertain where there are shortfalls or surpluses of open space, and to identify which existing open spaces should be protected from development. The Assessment for Headbourne Worthy (Pages 34-5) shows that the land within Policy W4 is designated as Natural Green Space. This map indicated that officers within Winchester City Council also believe the land within Policy W4 is not available for residential development. The view of these officers is consistent with the interpretation that Planning Inspector committed the land be preserved as open space.

**LEGAL FAILING: FAILURE TO ACCOUNT FOR ECOLOGICAL IMPACT OF POLICY W4 OR TO GIVE DUE CONSIDERATION TO PRIORITY BAT SPECIES** A bat survey conducted by Hampshire & Isle of Wight Wildlife Trust in 2019 identified the vital importance of the treeline that would form the northern boundary of the land within Policy W4.

<https://democracy.winchester.gov.uk/documents/s9458/KBF%2025%20Appendix%201%20B> Over a two-week survey period, twelve bat species (out of the UK's total of 17 species) were identified along the treeline. Of these, five are priority species under the UK Biodiversity Action Plan: soprano pipistrelle; noctule; brown long-eared; Bechstein's; barbastelle. Two of these bat species (Bechstein's and barbastelle) are also listed in Annex II of the Habitats Directive. The survey report concludes that Barton Meadows is an important site for bats and that the treeline itself (forming the northern boundary of the land within Policy W4) provides an important feature for a wide variety of bat species within the landscape. The report recommends that that treeline "should be considered a feature of vital importance to bats." The report and its conclusions were presented in response to the Regulation 18 consultation and were noted by Winchester City Council. The document is available here: <https://www.localplan.winchester.gov.uk/assets/attach/296/W4-Consultation-comments-onW4.pdf> Despite this, Policy W4 fails to give due consideration to its potential impact on bats and is therefore noncompliant with national policies and legislation. Policy W4 would enable detrimental and damaging development right up to the treeline, which is "of vital importance to bats" – and would create a significant new housing development right on the boundary of Barton Meadows nature reserve. Development of the land as proposed under Policy W4 would generate artificial light pollution from street lighting and housing, which is known to be detrimental and disruptive to bats' feeding and behaviour (authority for this is given here: <https://www.bats.org.uk/about-bats/threats-to-bats/lighting>). 150 houses on this land would additionally generate noise pollution, disturbance by people and vehicles, predation by pets, and application

of garden pesticides. These disruptive factors would apply to the tree line as a vital habitat for bats and would have a direct and detrimental impact on the rare and threatened bat species that are present. Given that Policy W4 does not give due consideration to priority species, it is contrary to the Natural Environment & Rural Communities Act 2006 which applies to local authorities. Section 40 of the Act states “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.” Under Section 41 of the Act, bats are listed by Defra as a priority species for the conservation of biodiversity.

**POLICY FAILING: FAILS TO ADDRESS DEFICIT IDENTIFIED IN WINCHESTER CITY COUNCIL OPEN SPACE ASSESSMENT** Policy W4 does not take account of the needs of residents for open space, and so is not based on sound policy. The Open Space Assessment that informs the emerging local plan is dated 2022, available here: <https://www.winchester.gov.uk/community-recreation/open-spaces/open-space-strategy> The Assessment bases its estimates for demand for open space on population figures from 2020. These figures were already out of date when the Assessment was published in 2022; they are an inappropriate measure of Winchester communities’ need for open space even today – and they are certainly inappropriate when assessing need for open space in the period 2030-2039 covered by the emerging local plan. Page 10 of the 2022 Open Space Assessment estimates each parish population size against the Local Plan open space standard of 40sq.m per person. The Assessment shows the population of St Bartholomew ward (which includes residents of Courtenay Road, Abbotts Barton and Northlands Drive) is in deficit of open space by 3.11ha.

The Assessment’s estimate of area available to informal open space appear likely to be an over-estimate of the actual area, because it includes inaccessible and inappropriate land in its calculation. For example, the estimate includes a large area of land (close to the railway line) in the King’s Barton development which is as a seasonal reservoir for surface-water and ground-water drainage, and is therefore fenced-off to prevent access for good reasons of public safety. Policy W4 is unsound because it does not address the assessed shortfall in open space provision – and instead proposes residential development which will exacerbate the open space deficit for residents.

**POLICY FAILING: POLICY W4 DOES NOT PRESENT JUSTIFICATION FOR HOUSING DEVELOPMENT IN A GREENFIELD LOCATION** Policy W4 amounts urban sprawl of northern Winchester on open land. The emerging local plan presents no justification to develop open space in this location, especially when the location is considered alongside the adjacent major development underway at Kings Barton and proposed new development at nearby Sir John Moore Barracks (Policy W2). When challenged on this lack of evidence in Regulation 18 consultation, Winchester City Council offered only a stock response of “The Council is required by Government to meet housing requirements.” The evidence base for allocating 150 units of high-density housing on this greenfield site was not provided – the proposal is unjustified, and the policy is

therefore unsound. Policy W4 is unsound because it does not present justification for housing development on greenfield land at this site – there are other comparable sites in the SHELAA (evidence base) which have less impact (social and environmental), but which are not included in the submitted plan.

**POLICY FAILING: REGULATION 18 CONSULTATION DISPROPORTIONATELY FAVOURED THE RESPONSES OF LANDOWNER/DEVELOPER CALA HOMES** In total there were 967 published responses to the Regulation 18 consultation. In response to Policy W4, the published figures show there were 116 responses – 12% of the total responses received. The document is available here: <https://www.localplan.winchester.gov.uk/assets/attach/296/W4-Consultation-comments-onW4.pdf> Of the published responses to Policy W4, there were 103 objections (89%), 9 neutral and 4 in support (3%). Disproportionate weight was given (as reflected the Regulation 19 policy) to two respondents in favour, who are clearly making representations from CALA (the landowner). The annotation to these comments from CALA is “noted and support welcomed.” The action taken in response to these two supporting comments was to increase the housing allocation under Policy W4 from 108 to 150 houses

Policy W4 is unsound, because it was formulated through giving disproportionate weight to the vested interests of the landowner. **POLICY FAILING: UNSUPPORTED BY LOCAL SERVICES PUBLIC TRANSPORT, LACK OF GP CAPACITY, LACK OF SCHOOL PLACES WITHIN WALKING DISTANCE** The Regulation 18 feedback, and Winchester City Council’s comments against it, identify a number of areas where the residents within the 150 houses could not be accommodated within existing services. The document is available here: <https://www.localplan.winchester.gov.uk/assets/attach/296/W4-Consultation-comments-onW4.pdf>

These include:

- There is no primary school capacity within walking distance. The Regulation 18 responses estimated 100 dwellings would generate 30 primary pupils – and so 150 dwellings would generate 45 primary school pupils. These would need to be accommodated by Kings Worthy Primary School, which is located at least 1.6 miles away and could only realistically be accessed by car.
- There is minimal public transport provision at this site – a single bus service from Worthy Road, with services each 20 minutes at peak time.
- There is no further capacity in GP and primary care provision - the Winchester surgeries and Primary Care Network does not assess it is able to absorb any further increases in population. Policy W4 is unsound because this development cannot be accommodated within existing or funded service provision. **POLICY**

**FAILING: FAILURE TO ACCOUNT FOR THE IMPACT OF INCREASED TRAFFIC THROUGH THE EXISTING ESTATE**

	<p>The traffic in the area around Courtenay Road and its junctions (especially with Park Road) are already dangerous. Policy W4 would have the effect of increasing vehicle traffic at the access junctions – these are Stoke Rd and Worthy Rd; Abbots Rd and Worthy Rd; Courtenay Rd and Park Rd. At present a total of some 167 dwellings are accessed from these junctions, in practise only a proportion of vehicles that access via these junctions then transit through the estate – many of these vehicle journeys will be to access houses within the existing estate. Policy W4 is likely to increase the number of vehicles using the access junctions by 90% (bringing total dwellings to 317). Although the local policy suggests there may be no parking allocated to these new properties, this seems unlikely given the very limited public transport provision and likely need of new residents to need cars for regular access to shops and essential services, such as schools and primary healthcare.</p> <p>The traffic situation is likely to worsen with the proposed redevelopment of the former Brendoncare site near the junction of Courtenay Rd and Park Rd. If (as suggested) Policy W4 does not allocate vehicle parking for new dwellings, then this could lead to disruptive and antisocial parking issues in all nearby communities. Policy W4 is unsound because it fails to assess or account for the impact of vehicles associated with new dwellings.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The land west of Courtenay Road should be taken out of housing allocation, and protected as open space to deliver ecological benefit and/or meet current and forecast community open space need. This aligns with national policy on need for more protected land, which (as a proportion of England’s land area) has fallen in the past year from 3.11% to 2.93% in the past year alone. Reporting (03 Oct 24) available here: <a href="https://www.theguardian.com/environment/2024/oct/03/nature-england-under-threat-protected-land-falls-data">https://www.theguardian.com/environment/2024/oct/03/nature-england-under-threat-protected-land-falls-data</a></p> <p>The landowner would have several options for future land use. These include focussing on environmental gain, by incorporating it in Barton Meadows nature reserve. Alternatively both community and environmental benefit could be realised by establishing a community farm. There are similar, successful models for this, including in Farnham (<a href="https://www.farnhamcommunityfarm.com/">https://www.farnhamcommunityfarm.com/</a>) and Highbridge Community Farm, Eastleigh (<a href="https://highbridgecommunityfarm.org/">https://highbridgecommunityfarm.org/</a>).</p> <p>If (despite these arguments in favour of protecting it as open space) this land is allocated for housing, at the very least there must be a meaningful stand-off distance between housing and the treeline to the north, with effective measures to minimise impact on the sensitive ecology of the nature reserve. Hampshire &amp; IoW Wildlife Trust (who manage Barton Meadows nature reserve) should be consulted on the most effective design and environmental impact mitigations, which should extend to artificial light pollution and be enforced through restrictive covenants.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The land west of Courtenay Road should be included within policy NE10 – Protecting Open Areas. These are open areas within defined settlement boundaries which have an important amenity, biodiversity, heritage or recreational value which are given protection from development.</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>There is a mixture of people wanting to take part/not wanting to take part in 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><a href="#">Form (comments on policy - includes pictures)</a></p> <p>The following people attached the identical form with their representation:</p> <p>Alison Morre, Andy and Nikki Carlisle, Chloe Wilk, Christopher Edouard Pasche, David Francis Adey, Ed Dolman, Edward Roberts, Eleanor Marion Williams, Geraldine Edith Bracey, Gillian Bardsley, Gillian Bourke, Jeanette Faulkner, John ramage, Julia Powell, Julian Paul English, Justyn Powell, Kate Bush, Linda Mackenzie, Lorna and Eoin McNeill, Louise West, Marie Stock, M-G Coyle, Michael John Robertson, Mrs Julia Adey, Naomi Irving, Nicola Dolman. Paul Bickerton, Sally Rowena Pasche, Samantha Griffiths, Sophie Butt, Stephanie Jacques</p>

<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Andrew Frost
<b>Personal reference number</b>	ANON-AQTS-32FV-T
<b>Full reference number</b>	ANON-AQTS-32FV-T/1/W4
<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 area was under the control of Cala Homes and was designated to be kept as open land and a biodiversity, according to the decision in 2012 by the Planning Inspector. See paragraph 396 on page 108 of <a href="https://www.winchester.gov.uk/assets/attach/3510/12-10-02-Barton-Farm-Redet-Combined.pdf">https://www.winchester.gov.uk/assets/attach/3510/12-10-02-Barton-Farm-Redet-Combined.pdf</a> It should be noted that only a tiny percentage of this area is actually publicly accessible given the fencing off of most of the open space. This area is also designated by Winchester City Council as "Natural Green Space" in their Open Space Assessment. This also identifies this area (Headbourne Worthy) as having a deficit of open space. See pages 10 and 34-35 of <a href="https://www.winchester.gov.uk/assets/attach/32483/WCC-Open-Space-Assessment-2022-WEB-VERSION.pdf">https://www.winchester.gov.uk/assets/attach/32483/WCC-Open-Space-Assessment-2022-WEB-VERSION.pdf</a> Paragraph 12.40 states "It is bounded by housing to the east, allotments to the south, and the railway line and Barton Farm (Kings Barton) development to the west, so it is well-related to the facilities and services being provided within Barton Farm". In actual fact, the site is not at all connected to the facilities and services in Barton Farm due to the fact that the only vehicular access is proposed from the east (Worthy Road). For any access to Barton Farm, this would increase traffic via Park Road: the junctions here are already difficult with visibility falling below safe levels, including the single-track bridge that is busy with school and college students throughout the day. Increasing the number of cars expected to use this route is not a safe proposal.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Comply with the Planning Inspectorate and the Winchester City Council Green Spaces policy, and remove Policy W4 from the new local plan.
<b>What is your suggested wording or text for the policy?</b>	Not needed.
<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>	W4
<b>Name of respondent (or client)</b>	Andrew Victor Gunn Tucker
<b>Personal reference number</b>	ANON-AQTS-32ZC-U
<b>Full reference number</b>	ANON-AQTS-32ZC-U/1/W4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	My overall objection is that the proposal revisits the decision to preserve that part of Barton Farm east of the Winchester/London railway line as free of urban development. The experience of Kings Barton shows that once outline planning permission is obtained, the developers are free to seek variations, increasing the density of housing, and reducing the supporting communal infrastructure. The uncertain scope of the proposal suggest it is not legally compliant. At present the site is accessed only via Courtenay Road, and a walkway under the railway line. The paved pathway is such that railway maintenance work requires planned access and the removal of barriers, The Increase of traffic from 100 or more homes will likely lead to overloading Courtenay Road (especially the blind corner onto Park Road), heavier flows on Abbots Road and Stoke Road, or a new access through the Barton Meadows reserve. This would neither be compliant with the assurances previously given, nor sustainable. The consultation has been woefully inadequate, with the residents most likely to be affected (those living inside the northern limit of the city) being informed at a later stage than those on the other boundary of the existing planning gap (Headbourne Worthy)
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The council would need stronger guarantees, not just commitments, to preserve the quality of the Nature Reserve and its environs. The impact on traffic flows between the development and the Worthy and Andover Road axes needs a stronger evidence base. The council has the chilling evidence of the School Bus crash on Wellhouse Lane, of over-reliance on satellite navigation.
<b>What is your suggested wording or text for the policy?</b>	In short: "The preservation of a sustainable Planning Gap between the Winchester/London Railway Line is essential to the preservation of the Barton Meadows nature reserve for the duration of the existing lease. It is therefore not appropriate to proceed with proposal W4 at this time."
<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>	W4
<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/6/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	W 4. Land west of Courtenay road should not be built on. They have had enough problems there with Barton Farm spoiling the area. That land is planned as a green field open settlement gap, with Barton Farm nature reserve. 150 homes would lead to traffic problems, as a rat run from Barton Farm would be created, & spoil the area. Courtenay Road is crowded already, & should not have any more building or traffic problems.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	W 4. SHELAA HW 09. Don't build on land west of Courtenay Road, which should continue as open land, with no traffic connection with Barton Farm.
<b>What is your suggested wording or text for the policy?</b>	Land west of Courtenay Road will not be built on. It will be kept as open land with Barton Farm nature reserve as planned.
<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>	W4
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/7/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Looks like a sensible in-fill. Personally I would prefer city centre residential developments to take priority
<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>	W4
<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-3263-7/2/W4
<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 enclosed Vision Statement provides our client’s vision for a new sustainable neighbourhood and also serves as a strategic planning document. The Statement provides information in support of the proposed site allocation (Policy W4 Land West of Courtenay Road) alongside the extensive range of evidence prepared by the Council. The Statement has been informed by site masterplanning and a range of technical assessments relating to transport, ecology / biodiversity, landscape, utilities, drainage and noise. This range of work confirms the sustainability and deliverability of the site and refines the Council’s assessment of site capacity. This range of work confirms that the site allocation can come forward for 160 dwellings, rather than ‘about’ 150 dwellings stated in the current draft Policy W4. This will also make a greater contribution to unmet housing need in the area including the Partnership for South Hampshire (PfSH) area.</p> <p>These representations highlight a need for amendments to policies W4 and H2 of the Submission Local Plan to deliver a higher level of housing with phased delivery during the first half of the plan period. I consider that the proposed changes would improve the soundness of the Plan. Reference made to Paragraph 35 of the NPPF. Cala Homes support the residential allocation of Policy W4 ‘Land West of Courtenay Road’.</p> <p>Winchester is the largest settlement in the district and the main focus for growth in the Local Plan settlement hierarchy. Winchester is a hub for many services and facilities, which benefit residents and businesses in the district and beyond. The site is sustainably located on the settlement edge of Winchester and within walking and cycling distance to primary and secondary schools, public open spaces / play facilities, leisure facilities, health facilities, local shops, Winchester Town Centre, public houses and other community facilities. The site is also located directly adjacent to the Kings Barton strategic allocation and benefits from accessibility to a range of key services and facilities including primary school, foodstore, health facilities, community building and strategic open space. The site is well contained and forms a natural extension to the settlement boundary in this location and maintains the integrity of the Kings Worthy / Headbourne Worthy Settlement Gap. It is bounded to the east and west by existing and future housing forming Courtenay Road and the Kings Barton development respectively. This is confirmed through the Council’s Landscape Gap Study undertaken to</p>



inform the Local Plan<sup>3</sup> and through the Landscape Assessment<sup>4</sup> undertaken by Green Landscape Studio (on behalf of Cala Homes) as set out in the submitted Vision Statement. Vehicular access to the site is served from Courtenay Road via Stoke Road. The Winchester to London railway line runs adjacent to the western boundary with a foot/cycle connection beneath providing permeability with the Kings Barton development. The site is also well connected to the regional road network from Winchester including the M3 and M27.

Our client is supportive of draft Policy W4 subject to amendments that are required to the policy to ensure it is 'sound' and to reflect the latest technical work undertaken by Cala Homes. The following objections are raised to the policy as currently drafted: We object to the Council's assessment of site capacity for 'about' 150 dwellings. Master Planning prepared for the site and submitted as part of the Vision Statement demonstrates that 160 dwellings can be provided for while complying with Policy W4 criteria and delivering a policy compliant housing mix at an appropriate density. We support the use of the wording 'about' or 'approximately' to provide necessary flexibility at development management stage. We object to the proposed phasing of the site from 2030. This approach is not justified and fails to take account of flexibility in housing supply required in the next 5 years to take account of potential delays in the implementation of strategic sites, non-implementation of planning permissions and in order to effectively address unmet housing need in the Winchester and wider PfSH regional area. We object to the site boundary which includes an eastern corridor on the northern edge of the settlement boundary to Worthy Road. A revised settlement boundary has been submitted as part of these representations which should replace the site boundary included in the local plan policies map and the allocation policy Site Plan and wider context maps. A transport feasibility assessment has been undertaken for the site, which concludes that appropriate cycle access can be established to the east via Courtenay Road / Stoke Road, linking to the Kings Worthy to Winchester cycleway and there is benefit in this being clarified in the supporting text to the policy. The following amendments are proposed to Policy W4 – please see response below for suggested changes.

In summary, the proposed new neighbourhood is sustainably located and is deliverable in terms of suitability, availability and achievability, as detailed in the enclosed Vision Statement. However, a range of technical assessments have identified the site allocation could come forward for about 160 dwellings in a policy compliant form. Furthermore, the Plan should include a small change to the allocation boundary and sufficient flexibility in its phasing to allow development delivery within the first five years of the Plan in order to address potential unmet housing need and improve the 'soundness' of the Plan. see additional info PDF

**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="#">Supporting information (commenting on policies and proposed site)</a></p>

<b>Policy/Evidence base document</b>	W4
<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/17/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67).</p> <p>The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year. On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.
<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>	W4
<b>Name of respondent (or client)</b>	Helen Corcoran
<b>Personal reference number</b>	ANON-AQTS-3B1H-7
<b>Full reference number</b>	ANON-AQTS-3B1H-7/1/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Pg 328: 12.45: New Housing vs School Provision (currently over-stretched) - how can King's Worthy Primary & Henry Beaufort accommodate the volume of potential new children? 12.46: New Housing vs GP provision (currently inadequate) - surely a blatant civic concern? Blithely glossed-over in the text. Similarly, Road provision - Worthy Road & surrounding streets simply not built to accommodate an increased weight of traffic . Policy W4, Environmental iv & v: Deliberately down-plays the RAILWAYLINE safety & noise risk (esp. for children living in the proposed properties).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Honesty: the infrastructure needed to support an extension of the suburb into this aquifer-rich area of GREEN FIELD simply does not exist, and is highly unlikely to magically materialise.
<b>What is your suggested wording or text for the policy?</b>	Delete it.
<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>	W4
<b>Name of respondent (or client)</b>	Helen Retter
<b>Personal reference number</b>	BHLF-AQTS-32YD-U
<b>Full reference number</b>	BHLF-AQTS-32YD-U/1/W4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Good morning, please could consideration be put into place for not putting any more houses on this space. Winchester needs green space and Kings Barton and Cassandra Road estate have taken a huge amount of our agricultural fields. Since the new housing has been put up Courtney Road, Stoke Road and Colley Close have had so much damage done to their homes through rats gnawing through pipes and creating a health hazard to the local residents. This has also cost residents a large amount of money. Please also consider the amount carbon monoxide that is going to pour out of cars in a small confined area with only one road in and out of a large estate Courtney Road. I also believe the area is a conservation for bats.
<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>	No

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



<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Howard Giles
<b>Personal reference number</b>	BHLF-AQTS-32Y2-9
<b>Full reference number</b>	BHLF-AQTS-32Y2-9/1/W4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	I'm writing to oppose the proposed building of 150 dwellings in the area west of Courtenay Road, which corresponds to Policy W4 in the local plan, Regulation 19. My view is that rather than linking up to other developed areas - Barton Farm and Courtenay Road - building on this field blocks the corridor of green spaces extending from Park Road allotments to Barton Meadows Nature Reserve. As you know, the designation of Barton Meadows as a nature reserve was some compensation for the large development of Barton Farm. To build right up to its limits - the line of beech trees you identify as important - would undermine the value of this reserve. There's a lot of recent evidence in the importance of linking green spaces so that birds and animals can move between them. I lament the loss of long-established hedgerow on the Barton Farm development and am concerned about further loss of green spaces and habitats for wildlife.
<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</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>	W4
<b>Name of respondent (or client)</b>	Jenny Lord
<b>Personal reference number</b>	ANON-AQTS-3BEA-M
<b>Full reference number</b>	ANON-AQTS-3BEA-M/1/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	12.41 the area is not suited for development of 150 houses. Doubling the number of houses on the Courtenay Rd estate by building on farmland will fundamentally change the character of the area, impacting the community, the Barton Meadows Nature Reserve and increase local traffic.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Reduce the number of houses significantly.
<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>	W4
<b>Name of respondent (or client)</b>	John Richard Moore
<b>Personal reference number</b>	BHLF-AQTS-32E7-T
<b>Full reference number</b>	BHLF-AQTS-32E7-T/1/W4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy W4, Page 327-329, Para 12.40-12.46
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The land west of Courtenay Road should be taken out of housing allocation, and protected as open space to deliver ecological benefit and/or meet current and forecast community open space need. This aligns with national policy on need for more protected land, which (as a proportion of England's land area) has fallen in the past year from 3.11% to 2.93% in the past year alone. Reporting (03 Oct 24) available here: <a href="https://www.theguardian.com/environment/2024/oct/03/nature-england-under-threat-protected-land-falls-data">https://www.theguardian.com/environment/2024/oct/03/nature-england-under-threat-protected-land-falls-data</a></p> <p>The landowner would have several options for future land use. These include focussing on environmental gain, by incorporating it in Barton Meadows nature reserve. Alternatively both community and environmental benefit could be realised by establishing a community farm. There are similar, successful models for this, including in Farnham (<a href="https://www.farnhamcommunityfarm.com/">https://www.farnhamcommunityfarm.com/</a>) and Highbridge Community Farm, Eastleigh (<a href="https://highbridgecommunityfarm.org/">https://highbridgecommunityfarm.org/</a>).</p> <p>If (despite these arguments in favour of protecting it as open space) this land is allocated for housing, at the very least there must be a meaningful stand-off distance between housing and the treeline to the north, with effective measures to minimise impact on the sensitive ecology of the nature reserve. Hampshire &amp; IoW Wildlife Trust (who manage Barton Meadows nature reserve) should be consulted on the most effective design and environmental impact mitigations, which should extend to artificial light pollution and be enforced through restrictive covenants.</p>
<b>What is your suggested wording or text for the policy?</b>	The land west of Courtenay Road should be included within policy NE10 – Protecting Open Areas. These are open areas within defined settlement boundaries which have an important amenity, biodiversity, heritage or recreational value which are given protection from 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>	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="#">Form (commenting on policy - includes pictures)</a></p>
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<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Judith Tucker
<b>Personal reference number</b>	ANON-AQTS-32MR-W
<b>Full reference number</b>	ANON-AQTS-32MR-W/1/W4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	This is a valuable open space that needs to be retained. The density of houses proposed would have a serious negative impact on the surrounding neighbourhood. With the large urban development of Kings Barton closeby, the encroachment of more houses, noise, pollution and cars in this area of North Winchester is not a sound idea. It would impact heavily on existing residents' welfare and that of heir families.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Consideration of a community farm and more allotment spaces.
<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>	W4
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/11/W4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Given that the Land West of Courtenay Road adjoins what is now a nature reserve, Barton Meadows, managed by the Trust, we consider that any development must contribute to the Nature Recovery Network and carefully manage access to Barton Meadows.</p> <p>Barton Meadows Nature Reserve was established as mitigation for specific features displaced by the Kings Barton development. It essential that further encroachment through development of land west of Courtenay Rd, does not undermine the planning conditions pertaining to mitigation at Barton Meadows or the ability of the Wildlife Trust to manage the nature reserve appropriately on behalf of Winchester City Council. Barton Meadows is an important corridor for wildlife in Winchester. Its close proximity to Winnall Moors nature reserve creates a wider landscape in which wildlife can travel, contributing to the Nature Recovery Network. Therefore, we consider that this development must not undermine the network but instead create opportunities for its enhancement.</p> <p>Furthermore, this development must have measures and infrastructure in place to keep people on the appropriate routes and zone access in and around Barton Meadows reserve. This will ensure that the development and increased recreational pressure doesn't undermine the management of the site. We also urge Winchester City Council to strategically allocate the farmland east of Worthy Rd between Winnall and Barton Meadows for Biodiversity Net Gain, given its importance in connecting the two reserves and the wider landscape and South Downs National Park.</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>	W4
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/11/W4
<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 W4 : Courtenay Road, Winchester As outlined above, the Council have enhanced the capacity of the Policy W4 allocation from 100 dwellings in the Regulation 18 Plan, to 150 dwellings in the Regulation 19 Plan. This is a consequence of 'discussions with site promoter and reconfiguration of linked allocation at W1 Barton Farm to include associated formal open space.' (para 6.6 Development Strategy and Site Selection July 2024). Taking into account the need to accommodate a minimum of 1.5 hectares of on-site multi-functional accessible informal green space, the implications of noise disturbance on precluding development within proximity of the railway line, and the need to safeguard the Winchester-Headbourne Worthy Settlement Gap, the uplift in housing capacity will require a much higher density of development than originally anticipated. Taking into account the above and assuming a 4 hectare development area, this would equate to a net density of 37.5 dwellings per hectare. It is questionable whether this is appropriate on an edge of countryside location and a site that is acknowledged as having a medium-high landscape sensitivity. An alternative would be to identify my client's site as at the very least an additional allocation.</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 evidence base re: Land at Harestock Road)</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>	W4
<b>Name of respondent (or client)</b>	Merial McCullagh
<b>Personal reference number</b>	BHLF-AQTS-32YZ-H
<b>Full reference number</b>	BHLF-AQTS-32YZ-H/1/W4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>My representation is below.</p> <p>(GDPR: My name, address and phone number (which I understand you require in order to make a representation) may be sent to the programme officer but NB please delete any record of my email address. )</p> <p>I am writing to object to the proposal to build 150 houses on a field near Courtney Road.</p> <p>There are various problems associated:</p> <ul style="list-style-type: none"> <li>A. Unacceptable increase in traffic;</li> <li>B. Not enough open space already for local residents by area;</li> <li>C. Bats adversely affected;</li> <li>D. Use of a greenfield site which is an amenity used for informal recreation - the use of brownfield sites should be considered;</li> <li>E. Lack of supporting resources in the community for such an increase in population eg doctors.</li> </ul>
<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>No</p>
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<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/29/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The ICB supports the current policy statements, but would like to see Health added as per Education re infrastructure.
<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)</a>

<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Mrs S M McKinlay
<b>Personal reference number</b>	ANON-AQTS-32ZA-S
<b>Full reference number</b>	ANON-AQTS-32ZA-S/1/W4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<ol style="list-style-type: none"> <li>1. The policy fails to protect the land from development as clearly directed by the Barton Farm planning inspector in the 2012 decision. This required the land to be used for informal recreation and managed as a biodiversity area. This position is supported by Winchester City Council's own Open Space Assessment.</li> <li>2. There is a clear failing to account for the Policy's ecological impact, and in particular the priority bat species identified on the land.</li> <li>3. There are significant flaws in the Council's Open Space Assessment, not least the use of incorrect population figures and the open space assessments used, rendering the Policy unsound.</li> <li>4. There is no justification for the development of this greenfield site while there are other less sensitive sites in the SHELAA and elsewhere.</li> <li>5. The proposal does not account for the impact of increase highways movements through constrained residential roads and already compromised junctions.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Policy should be deleted and protected as open space with community access, as was the Inspector's intention when the Barton Farm major development was permitted.
<b>What is your suggested wording or text for the policy?</b>	The land should be included within Policy NE10 - Protecting Open Areas.
<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>	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>	W4
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/27/W4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>150 dwellings would be expected to generate approximately 45 primary age pupils and 32 secondary age pupils. The development would currently be in the catchment areas of Kings Worthy Primary and Henry Beaufort School. Kings Worthy is forecasting some capacity and may be able to accommodate but it is noted that this development is not anticipated before 2030 which is outside of the school's forecasting period.</p> <p>Henry Beaufort will be under pressure from Barton Farm and Sir John Moore Barracks developments so a secondary contribution may be required. As part of plans to develop a dense connected cycle network for Winchester, the County Council is currently developing plans for a high-quality active travel corridor along the B3047 Worthy Road/ Worthy Lane corridor towards Hyde Street and Andover Road, to complement the existing cycle route to the City Centre via Dyson Drive, River Park and Middle Brook Street. This site is in a highly sustainable location, well-served by bus. As part of the development, it would be good to explore how the kink in the existing active travel route from Courtenay Road to Kings Barton could be removed, as this would make this linkage more direct, safer and more legible for users. Any new active travel links from the site to this route should be constructed to design standards set out in LTN 1/20. Policy W4 iii) should be amended to contribute to any other off site junction transport improvements necessary'.</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="#"><u>Letter (commenting on policies and evidence base)</u></a>

<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Paul Bracey
<b>Personal reference number</b>	BHLF-AQTS-32YA-R
<b>Full reference number</b>	BHLF-AQTS-32YA-R/1/W4
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>My name is Paul Bracey, My daughter, son in law and grandchildren aged 7 and 9, live in Courtenay Rd. Courtenay Road, is a quiet, safe, small residential street and appears to be the only access into this planned development. It is not suitable for domestic traffic from 150 new houses, let alone the traffic generated by the construction vehicles. I understand that there is likely to be limited parking in the development, so I am concerned that there will be overspill parking in Courtenay Road.</p> <p>Also, there is no primary school capacity within walking distance. The Regulation 18 responses estimated 100 dwellings would generate 30 primary pupils – and so 150 dwellings would generate 45 primary school pupils. These would need to be accommodated by Kings Worthy Primary School, which is located at least 1.6 miles away and could only realistically be accessed by car.</p> <p>There is minimal public transport provision at this site – a single bus service from Worthy Road, with services each 20 minutes at peak time. There is no further capacity in GP and primary care provision - the Winchester surgeries and Primary Care Network does not assess it is able to absorb any further increases in population. Policy W4 is unsound because this development cannot be accommodated within existing or funded service provision.</p> <p><b>POLICY FAILING: FAILURE TO ACCOUNT FOR THE IMPACT OF INCREASED TRAFFIC THROUGH THE EXISTING ESTATE</b> The traffic in the area around Courtenay Road and its junctions (especially with Park Road) are already dangerous. Policy W4 would have the effect of increasing vehicle traffic at the access junctions – these are Stoke Rd and Worthy Rd; Abbotts Rd and Worthy Rd; Courtenay Rd and Park Rd. At present a total of some 167 dwellings are accessed from these junctions, in practise only a proportion of vehicles that access via these junctions then transit through the estate – many of these vehicle journeys will be to access houses within the existing estate.</p> <p>Policy W4 is likely to increase the number of vehicles using the access junctions by 90% (bringing total dwellings to 317). Although the local policy suggests there may be no parking allocated to these new properties, this seems unlikely given the very limited public transport provision and likely need of new</p>

	<p>residents to need cars for regular access to shops and essential services, such as schools and primary healthcare.</p> <p>The traffic situation is likely to worsen with the proposed redevelopment of the former Brendoncare site near the junction of Courtenay Rd and Park Rd.</p> <p>If (as suggested) Policy W4 does not allocate vehicle parking for new dwellings, then this could lead to disruptive and antisocial parking issues in all nearby communities.</p> <p>Policy W4 is unsound because it fails to assess or account for the impact of vehicles associated with new dwellings.</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>No</p>

<b>Policy/Evidence base document</b>	W4
<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/79/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W4
<b>Name of respondent (or client)</b>	Robert Grant
<b>Personal reference number</b>	ANON-AQTS-32N5-1
<b>Full reference number</b>	ANON-AQTS-32N5-1/2/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	This site for housing has many local detractors, but I strongly support providing homes for younger people who are the workforce and future of the area. Yes, in my back yard!
<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>	W4
<b>Name of respondent (or client)</b>	Stephanie Burch
<b>Personal reference number</b>	ANON-AQTS-3BQR-H
<b>Full reference number</b>	ANON-AQTS-3BQR-H/1/W4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	With the number of houses still to be sold on Barton Farm and the constant reducing of prices to attract buyers it cannot be deemed that any additional houses in this area on top of the Barton Farm development is required. This allocation does not align with 'Conserving and enhancing the natural environment' by removing yet more open green spaces within Winchester. We pride ourselves in being a sought after city to live but the ever increasing house building on Green belts and open spaces is eroding this. Doubling the number of houses on the Courtenay Road estate by building on farmland will fundamentally change the character of the area, impact the existing community and the Barton Meadows Nature Reserve. The increase pressure on road infrastructure and public amenities is not clearly demonstrated. The doctors and dentist surgeries are already overwhelmed with it impossible to get appointments. And the waiting lists at nurseries as laughable. I had to sign my daughter up when I was 6 months pregnant with her to ensure she got a space. This plan does not assess this strain significantly and the future cumulative impact of the increased (already approved) housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove the allocation of land west of Courtenay Road, enough brownfield land and existing approved greenfield land is available without eroding the existing character of the communities in this area.
<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>	W4
<b>Name of respondent (or client)</b>	Stephen John Parrett
<b>Personal reference number</b>	ANON-AQTS-3B8K-H
<b>Full reference number</b>	ANON-AQTS-3B8K-H/1/W4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>General issues</p> <ul style="list-style-type: none"> <li>The infrastructure in the city area is already overloaded and struggling to cope, among other things, schools at both primary and secondary levels are overcrowded, the rail and road links are stressed and a doctor's appointment will be several weeks away. These matters have been largely ignored by developments over the last few years. For example, apart from a Primary School, no mitigation has been provided for the Barton Farm Development.</li> <li>Now is not the time to be taking prime farming land out of use and encouraging more people into the area. With food shortages a potential future problem, encouraging more people whilst depleting resource is short sighted.</li> <li>Sales of new homes are sluggish at best, maybe the area is saturated.</li> </ul> <p>Specific Issues</p> <p>At a more practical level the following are reasons not to build houses on this area.</p> <ul style="list-style-type: none"> <li>The current and future development at Kings Barton together with that at Sir John Moore Barracks are sufficient for this part of Winchester, local residents have already lost enough amenity areas.</li> <li>The Plan recognises that "The site is within the currently defined Winchester to Kings Worthy / Headbourne Worthy Settlement Gap. However, it is well-contained and suited to development and development would not extend the built-up area beyond its current northern boundary, helping to retain the openness of the settlement gap." This perverted logic says that developing the site will help to retain the openness</li> <li>When Barton Farm is completed, the land in W4 will be part of the only gap remaining. In addition, the proposal would completely isolate the adjacent allotments which currently form a part of the Gap</li> <li>The Secretary of State's Decision and Inspector's Report Letter dated 02 October 2012 (Ref APP/LI765/A/10/2126522) includes at Para 396: "It is also proposed that land to the east of the railway line, which is controlled by the Appellant, will be used for informal recreation and dog walking and managed as a biodiversity area. The implementation and management of this area would be controlled through a planning condition and the provision for public access across this land is dealt with in one of the Planning Obligations."</li> </ul>



To paraphrase, if development on Barton Farm is be allowed then the land east of the railway should remain undeveloped. Why does this alone not preclude POLICY W4/HW09?

The Council's position that the provision of "Barton Meadows" fulfils this requirement is patently incorrect since W4 is east of the railway line and controlled by CALA.

- The Winchester District Local Plan (Development Strategy and Site Selection 2022 – Appendix 3) has the following recommendation “The site was assessed to score: 12 = high sensitivity: protection from development is the preferred option.”
- The two points above suggest that it is recognised that sufficient development has already taken place in the area north of the city. If these 150 properties are really required then there must be a better alternative site that has not already suffered the reduction in open space.
- If access is proposed via Stoke Road and Courtenay Road then it should be noted that on-street parking effectively makes these single-track roads for most of the relevant route. If, as shown on early plans, the access is to the north of the rear of Colley Close then as well as destroying more amenity land, the provision of adequate vision splays would result in unacceptable loss of hedgerows.
- The number of cars parked (in Stoke and Courtenay Road) by those currently enjoying the facilities to the west of the railway line demonstrates the need for green recreation spaces.
- Any exit on to London Road will increase the traffic at the dangerous junction of London Road and the A33 Basingstoke Road. Such an exit will also exacerbate the congestion at the Worthy Road/B3420 junction and/or the junctions at both ends of Park Road.
- The huge balancing ponds on the Kings Barton development suggest that local drainage facilities are already overloaded.

There are many places in the proposed Local Plan that should specifically exclude PolicyW4/HW09 from the list of Site Allocations and others that make its inclusion undesirable; for example: -

- In the Introduction it is noted that the area has an above average carbon footprint and that our City is surrounded by beautiful green spaces.
- In the Objectives section (p20) one of the key requirements is to “Provide, protect and enhance blue/ green infrastructure to include open spaces, green links and wildlife corridors with support from the Biodiversity Action Plan”.
- P25- “In recent years the council has received a number of applications for bespoke dog activity / outdoor play” and “There may exceptionally be circumstances where residential accommodation may be justified in the countryside.
- P32 “the provision of Green/Blue Infrastructure (Policy NE4) is equally as important as new development needs to be designed in a way to help to mitigate the impacts of high temperatures and overheating (Policy CN1), reduce flood risk through use of Sustainable Urban Drainage Schemes (SuDS) (Policy NE6) and increase biodiversity net gain (Policy NE5)”.
- Development of Policy W4/HW09 will fail most of the 5 requirements in Strategic Policy D1 on P77.

- The design requirements in place when Courtenay Road (and the adjoining roads) were built have been updated and the proposed access to Policy W4/HW09 has curves that would not meet current standards.
- The whole of the section beginning on P128 “Biodiversity and the Natural Environment” should preclude PolicyW4/HW09, of particular note is key issue vii “The settlement gaps need to be strengthened to avoid the coalescence of towns and villages and ensure suitable separation is maintained between them and new ones may be needed”. New ones may be needed existing ones should not be diminished. Additionally, at P133 it notes that “The plan also presents opportunities to promote the requirement for net gain in biodiversity..... and protect more valuable agricultural soils from development” and that “The proposed policies have been developed to protect and enhance the natural capital of the district”
- Strategic Policy NE1 should immediately exclude Policy W4/HW09.
- Policy NE5 says “The Local Planning Authority will require, in accordance with the Environment Act 2021, development to deliver a minimum of 10% measurable net gain in biodiversity”
- Policy NE7 seems to say that existing Settlement Gaps should be retained, Winchester/Kings Worthy, Headbourne Worthy is a named example.
- Clause 10.165 “In order to maintain the character of the countryside, new built development is generally kept to a minimum.”
- P308, Policy W4/HW09 is the only site that requires an amendment to the Settlement Boundary

The point of this paper is to show that Policy W4/HW09 is not a suitable site for development, its purpose is not to find better alternative proposals. Nevertheless, the following examples would render Policy W4/HW09 unnecessary

Number of Dwellings needed

The table on P215 gives the Standard Method Total -13,565, to which is added Unmet Needs in neighbouring authorities- 1,900 and from which is deducted 350 Dwellings in the National Park. This leaves 15,115. Thereafter, making any real sense of actual requirements and availability gets lost in a mire of disconnected statistics. However there appears to be plenty of opportunity for opinion to alter the stated requirements/proposals; the Plan is an estimate.

Nevertheless, a couple of interesting questions are left unanswered. Firstly, where, precisely are the “Unmet Needs”, why are they unmet, what proportion is Winchester Town proposing to take and why. If this suggested Unmet Need is wrong by 10% then Policy W4/HW09 is not required. Secondly, in the SHELAA, the Courtenay Road site had a capacity for 100 dwellings, the Local Plan gives it a capacity for 150. The corresponding figures for Sir John Moore are 1264 and 900 respectively. Why the former has increased and the latter decreased is not explained but, if the Sir John Moore capacity reverts to 1264 then Courtenay Road W4 is not required.

In summary, given the number of assumptions within the Local Plan together with the possible future opportunities (evidenced by the SHELAA list) and the selected examples of the clash between this site and the Local Plan aims, one wonders where the incentive to build on this site comes from.

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Remove W4 from the list of development applications.</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>No</p>

<b>Policy/Evidence base document</b>	W4
<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-4/6/W4
<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). Housing development: Size 5.7ha. for 150 dwellings</p> <p>This site allocation is within the Winchester – Kings Worthy/Headbourne Worthy Settlement Gap, to which Policy NE7 applies which states: “The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps:” “Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.” The supporting text to Policy W4 in paragraph 12.41 states that: ‘The site is within the currently defined Winchester to Kings Worthy/ Headbourne Worthy settlement gap. However it is well contained and suited to development and development would not extend the built up area beyond its current northern boundary [the rear gardens of Colley Close] helping to retain the openness of the settlement gap.’ This statement displays a limited understanding of the spatial quality of the gap which extends from the allotments in Park Road to the south, across the allocation site used for arable agriculture and the Barton Farm Nature Reserve to Well House Lane, Headbourne Worthy in the north. To the west is the railway line with the 2,000 house allocation of Barton Farm beyond.</p> <p>By virtue of its small area, the settlement gap plays an important and valued role in separating the settlements of Winchester, Kings Worthy and Headbourne Worthy. There is a well-used footpath that passes under the railway line from Kings Barton to Worthy Road and around the recently established Nature Reserve. Kings Barton is a development of 2,000 houses. The arrival of the new residents at Kings Barton has meant that the value of the open space within the gap has grown, rather than diminished. The allocation of the arable land between the Park Road allotments and the Barton Farm Nature Reserve for 150 dwellings represents a scale of development that would undermine the function of the gap and threaten the open and undeveloped nature of the gap, which Policy NE7 seeks to protect. The need to allocate land for housing should not outweigh the objectives and constraints of sound planning policies.</p>

	To comply with Policy NE7, the site allocation for 150 dwellings should not be permitted and Policy W4 should be omitted from the Regulation 19 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>	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 - response detailed in letter)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W4
<b>Name of respondent (or client)</b>	Victoria Duxbury
<b>Personal reference number</b>	ANON-AQTS-3BPE-3
<b>Full reference number</b>	ANON-AQTS-3BPE-3/1/W4
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	This area has already been massively affected by Barton Farm. The volume of people using the Nature Reserve has risen significantly. Further development would be claustrophobic and lead to saturation. The roads are already busy and cycle/pedestrian provision along Worthy Road is poor. The area could not cope with 150 more houses and the loss of open space would be a travesty.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	If any housing were permitted on this area it should be a far smaller development which could retain the open space and protect the Nature Reserve.
<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](#) – additional text added to paragraph 12.41 regarding Barton Meadows Nature Reserve following a discussion with Officers regarding the HIWWT representation.

[Proposed Modification](#) to the boundary of the site.

[Proposed Modification](#) agreed with HCC regarding the wording of criterion iii in Policy W4.

[Proposed Modification](#) agreed with the HIOW ICB regarding addition of wording in vi

Local Plan Reference or document	Policy W5 Bushfield Camp	
Total Number of Representations received.	42	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	17	12
Sound	4	27
Complies with Duty to Cooperate	17	12
<p><b>Summary of Representations</b></p> <p>Concerns were raised about the alignment of this policy with national and local environmental plans, particularly regarding biodiversity and the protection of natural habitats. Concerns were raised over the development’s potential harm to biodiversity/ecological areas. It was considered that the proposed development would adversely affect local recreational spaces and instead the site should be preserved as green accessible spaces/Country Park/Local Green Space for public use.</p> <p>Respondents expressed comments that the development of this site was in direct conflict with Winchester City Council’s carbon neutrality goals by 2030, reducing carbon emissions and the national biodiversity goal. The site contains a diverse range of habitats for rare species and should be protected from development. Comments question whether the development would truly benefit local economy or simply disrupt existing employment dynamics as development should instead be directed to a site within the Winchester settlement boundary.</p> <p>Concerns were raised issues related to transport and infrastructure and a lack of sustainable travel initiatives which would increase traffic and emissions.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BR1-H/6/W5  ANON-AQTS-3BR4-M/1/W5  ANON-AQTS-3BSY-T/76/W5  ANON-AQTS-3BPX-P/1/W5  <b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/27/W5</b>  ANON-AQTS-327A-P/1/W5  ANON-AQTS-32CQ-J/1/W5  <b>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/13/W5</b>  ANON-AQTS-3299-G/16/W5  ANON-AQTS-32N9-5/4/W5  ANON-AQTS-32NY-5/1/W5  ANON-AQTS-32U5-8/4/W5  <b>ANON-AQTS-327U-A - Southern Water/31/W5</b>  ANON-AQTS-3BBF-P/1/W5</p>		



ANON-AQTS-32F8-V/2/W5

ANON-AQTS-32F2-P/5/W5

ANON-AQTS-32MA-C/1/W5

ANON-AQTS-32MP-U/1/W5

ANON-AQTS-32MB-D/1/W5

ANON-AQTS-32MK-P/1/W5

ANON-AQTS-32ZS-B/6/W5

ANON-AQTS-32K9-2/2/W5

ANON-AQTS-3B8M-K/15/W5

**ANON-AQTS-32N7-3 - Twyford Parish Council/3/W5**

BHLF-AQTS-32E9-V/1/W5

**BHLF-AQTS-32E8-U - Otterbourne Parish Council/1/W5**

BHLF-AQTS-32ET-Q/1/W5

**BHLF-AQTS-32EU-R - Hursley Parish Council/4/W5**

BHLF-AQTS-326P-4/5/W5

BHLF-AQTS-3264-8/4/W5

BHLF-AQTS-326H-V/1/W5

BHLF-AQTS-32YF-W/1/W5

BHLF-AQTS-32Y1-8/1/W5

BHLF-AQTS-32YE-V/1/W5

BHLF-AQTS-32YY-G/1/W5

BHLF-AQTS-32YQ-8/5/W5

BHLF-AQTS-32Y3-A/1/W5

**BHLF-AQTS-3282-8 - Natural England/14/W5**

BHLF-AQTS-328V-C/6/W5

BHLF-AQTS-3284-A/16/W5

BHLF-AQTS-328M-3/4/W5

BHLF-AQTS-32QQ-Z/10/W5

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

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

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Alison Spottiswoode
<b>Personal reference number</b>	ANON-AQTS-3BR4-M
<b>Full reference number</b>	ANON-AQTS-3BR4-M/1/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>W5 is not justified. It fails the soundness tests on several counts and conflicts with other policies in the regulation 19 Plan. The Bushfield Park area is in open countryside and in the Winchester – Compton Street settlement gap as set out in Policy NE7 of the Regulation 19 Plan. Policy NE7 states, with regard to settlement gaps: 'Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.'</p> <p>Bushfield Park is now an open part of the landscape which is rural in character and full of biodiversity. Any development other than in the small areas where it is paved would drastically reduce the biodiversity of the site. I am dismayed that the proposed Winchester Local Plan 2020-2040 has designated the Bushfield Park site as 'multi-use' which is entirely inappropriate as the area is completely given over to nature and should stay that way to preserve our wildlife and diversity. I regularly walk my dog in Bushfield Park and it is a haven for all kinds of birds, bees and other wildlife. There are a few paved areas which maybe could be built on (or preferably just removed so wildlife can take the whole site), but most of the site is just wild and should be left that way. Winchester needs wildlife, it doesn't need more buildings and commerce - Winnall Business Park already has empty retail space which shows no sign of being filled.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Bushfield Park should be categorised as a wildlife area. At worst, the majority of the site should be left for nature with only the parts of the site used in for a military base should be allowed any development at all.
<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>	W5
<b>Name of respondent (or client)</b>	Andrew Craig
<b>Personal reference number</b>	ANON-AQTS-32ZS-B
<b>Full reference number</b>	ANON-AQTS-32ZS-B/6/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The proposed policy W5 Bushfield Camp is not sound as it does not take account the evidence base prepared for the Local Plan, including specifically the Open Space Assessment 2022. This assessment documents that Winchester Town area has a large deficit of sports grounds, parks and recreation grounds of circa 18 hectares. This site has the opportunity to allocate a reasonable area of land to provide organised sporting facilities, particularly due to its close access to transport networks, distance from residential areas, and time utilisation benefits of mixing commercial working hours with the premium sporting requirements of evenings and weekends. The original planning consultations for this site advocated the provision of a sizeable sporting area by the Developer, which received significant support through extensive feedback from the community for this purpose. However, any mention of this and obligation for this to be part of the planned site has been thus far omitted from this Local Plan. To be sound and compliant we believe this should be retained as an essential element of this proposal.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Ensure this development site also complies with policies NE3 and NE10 and contributes to the WCC Open Spaces objectives.
<b>What is your suggested wording or text for the policy?</b>	Policy statement add xix) It is expected that the allocation of land and provision of facility infrastructure to provide sports ground facilities as part of this development would facilitate the compliance with policies NE3 and NE10 of the Local Plan.
<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>	W5
<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/16/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Fails on being positively prepared, effective and consistent with national policy. Para v should specify active and sustainable travel links to Shawford station as well as Winchester station. Shawford station is currently under-utilised: as it is likely that a large proportion of the workers on the site will be arriving from the south of the county, this is an obvious connection. Failure to take this into account will have a knock-on effect for neighbouring authorities.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Add reference to active travel links to Shawford Station.
<b>What is your suggested wording or text for the policy?</b>	At end of Para v: “... and links to the Winchester train station, Shawford train station, the city centre and existing nearby park and ride facility;”
<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.*

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Anne Harrison
<b>Personal reference number</b>	BHLF-AQTS-32YY-G
<b>Full reference number</b>	BHLF-AQTS-32YY-G/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	I would like to comment on the planning application to develop Bushfield Camp, as I feel that this is a much wider range of uses than the current Local Plan said would be acceptable. The wide range of proposed uses goes way beyond the low key employment uses originally mooted, and in the Local Plan (section WT3), so the proposed development is likely to have a much more significant impact on the landscape, on traffic, air quality, and biodiversity. This feels like an application for a whole new small town on the edge of Winchester, which I feel will impact the city centre by making it even less attractive and important than it is now.
<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>	W5
<b>Name of respondent (or client)</b>	Christopher Tolley
<b>Personal reference number</b>	ANON-AQTS-32MP-U
<b>Full reference number</b>	ANON-AQTS-32MP-U/1/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	My understanding is that in the previous local plan Bushfield Camp was allocated as an Employment Site, not for Mixed Use as stated here (para 12.47). The plans outlined in W5 conflict with other policies in the reg 19 plan, such as NE1, 5, 7, SP3 and CN1. If Winchester City Council is serious about these other policies it should not permit development at Bushfield Camp.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	It is my view that the only sound approach to Bushfield Camp is not to permit development. Any development would be hugely detrimental to the environment and the southern edge of the city. Several of the facilities proposed for Bushfield Camp are not needed at all in Winchester; others could be accommodated within the city itself.
<b>What is your suggested wording or text for the policy?</b>	Bushfield Camp: no 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>	No

<b>Policy/Evidence base document</b>	W5
<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-32U5-8/4/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Our clients are supportive of the proposed allocation on the Bushfield Camp (Policy W5) which relates to “high quality flexible business and employment space, an innovative/education hub and creative industries”, with approximately 20 hectares of the site subject to contain built development. It is positive that paragraph 12.48 confirms that the site is defined in a broad way to enable a comprehensive approach to be taken regarding the future development of the land. We have comments on the following elements of the policy and supporting text and suggested modifications we believe are required.</p> <p>It is recognised that main town centre uses should follow the national planning approach of locating within the town centre in the first instance. However, for a development of this scale, it would be prudent for the policy to allow for some complementary uses such as a hotel to support the employment led development on site. In addition, some small scale and/or ancillary town centre uses could be appropriately located on this site without detracting from the town centre. Additional flexibility should be captured within the proposed Bushfield Camp policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Paragraph 12.51 states that “prominent highly visible structures would likely be visually distracting and unsympathetic, especially as they could draw attention from the assets or affect the skyline.” It should be clarified within this wording that development of the scale at Bushfield Camp cannot be fully screened and may be visible in key views. The policy should recognise that through careful massing, high quality architecture, retention of existing tree belts and new planting, sympathetic lighting etc that development may be visible but not visually distracting and unsympathetic.</p> <p>Paragraph 12.54 states that “junctions that are identified to be subject to detrimental traffic impact will need to be assessed and appropriately mitigated, any infrastructure measures should ensure that the hierarchy of active and sustainable travel modes are prioritised over capacity improvements, in line with LTP4 policies. Early discussions should take place with HCC and National Highways.” We suggest the below amended wording is included: “junctions that are identified to be subject to detrimental traffic impact will need to be assessed and appropriately mitigated to an acceptable degree. Any infrastructure measures should ensure that the hierarchy of active and sustainable travel modes are prioritised over capacity improvements, in line with LTP4 policies. Early discussions should take place with HCC and National Highways.”</p>

	<p>This suggestion it to align the language used within policy point (vi) and to allow for the potential that not all measurably detrimental motor traffic impacts are necessarily to be fully mitigated (in line with wider policy and practical constraints).</p> <p>In terms of the policy wording, the rationale behind policy point iv) is supported, however we would request additional wording is added to relate to ancillary/small scale/complementary town centre uses being supported on the site. For example, policy point ix) requires active ground floor spaces and the inclusion of this wording in point iv) would assist in achieving this policy aim.</p> <p>The wording of policy point (xii) has been slightly amended and includes a commitment to retaining features of heritage significance and incorporating them into any redevelopment of the site. We would highlight that the remaining built structures on site, which includes the gymnasium steel frame structure and the remaining wall of a vehicle store located within the Bushfield Camp area associated with the Second World War, are not considered to be of high significance, due to their poor condition.</p> <p>Following the extensive design process undertaken as part of the planning application (ref. 23/02507/OUT) it has been determined that there is little value in their retention. The Heritage Chapter within the Environmental Statement that accompanies the application states that the gymnasium is in poor condition, but is of some local interest as evidence of the military use of the site. As these features are of negligible to low importance (figure G3.1 of the ES) and consequently they have not been incorporated or retained in the masterplan proposals.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Paragraph 12.58 includes two revised bullets on the masterplan process. In relation to the last point on retention of existing biodiversity, we would suggest the following amended wording: “Seek to address retention where feasible, enhancement, and management of the existing biodiversity interest on site, in particular the large areas of chalk grassland.”</p> <p>We would suggest the following minor amendments to the wording of policy point (xii): “The proposals seek to retain features of heritage significance where feasible and incorporates them into any redevelopment of the site as part of a wider heritage trail that celebrates the sites military history and place of enjoyment by the general public to understand and appreciate how the site has evolved”</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>
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<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	David Killeen
<b>Personal reference number</b>	BHLF-AQTS-32EU-R - Hursley Parish Council
<b>Full reference number</b>	BHLF-AQTS-32EU-R - Hursley Parish Council/4/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Note also that the change of the Bushfield Camp allocation to mixed use would be expected to significantly increase traffic along the Romsey Road and is against Hampshire LTP4.
<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 policies)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Dawn Felton
<b>Personal reference number</b>	BHLF-AQTS-32YF-W
<b>Full reference number</b>	BHLF-AQTS-32YF-W/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	I would like to support the protect The Bushfield from proposed work and buildings. The site should be kept for the community to enjoy and for the wildlife.
<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>	W5
<b>Name of respondent (or client)</b>	Dr Penny Lawrence
<b>Personal reference number</b>	ANON-AQTS-3BPX-P
<b>Full reference number</b>	ANON-AQTS-3BPX-P/1/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>I think Policy W5 is unsound. It would facilitate a damaging level of development in the outline planning application (23/02507/OUT) which was submitted on 27 October 2023. No case for employment on this site Policy W5 is unsound because it is not justified. The need for mixed use development as set out in the policy is not supported by clear evidence. There is insufficient local economic need for the development. In the adopted plan (WT3) the site is allocated as an Employment Site. However the landowner has failed to develop the site so therefore is not an “effective” allocation. It was not deliverable over the plan period and there is no evidence to demonstrate that it can be delivered during the plan period. Policy W5 fails the soundness test c (effective). At no stage has the operational need for this Employment Allocation for a countryside location been made,</p> <p>Remedy  Employment land in the city centre is sufficient to meet the forecast need based on past completions. Winchester Town Centre is well served by public transport to provide a sustainable solution for serving additional employment, in contrast to the location and lack of public transport connections at Bushfield Camp. + Bushfield is Greenfield not brownfield ( or grey). Conflicts with policies to protect biodiversity  The allocation of Bushfield Camp at Policy W5 of the Reg 19 Plan is unsound because it is not justified as it conflicts with the following policies in the Reg 19 Plan:</p> <ul style="list-style-type: none"> <li>• NE1 Protecting and enhancing Biodiversity and the Natural Environment</li> <li>• NE5 Biodiversity</li> <li>• NE15 Special Trees, Important Hedgerows and Ancient Woodlands</li> <li>• NE17 Rivers and their Settings</li> </ul> <p>It conflicts with the following paragraphs of the NPPF: NPPF paragraphs 180,185, 186, 187, 188, 189-194 (ground conditions and pollution) And it is not consistent with findings in the Habitats Regulation Assessment that has been carried out to support the as yet undecided planning application on this site. To overcome this failure and to ensure that the Plan is sound the allocation W5 should be removed from the plan.</p>



Anh proposed 'offsetting' of biodiversity cannot avoid damage to the actual biodiversity. The Bushfield site is rich in flourishing biodiversity respected and appreciated by local human residents and home to protected species including Hazel Dormouse, Cinnabar moth, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Red Kite, Bullfinch, Linnet, Song Thrush, Turtle Dove, Yellowhammer, Helleborine, Tor-Grass. Common Lizard, Slow Worm, Badger, Warblers, Fieldfare, Tawny and Little Owl, and Woodpecker, Glowworm and 11 species of bat are also present at the site which is a significant hedgerow and woodland habitat. The wider impact could be loss of priority habitats and species, the fragmentation of the Nature Recovery Network and unmitigated recreational impacts on River Itchen SSSI/SAC and St Catherine's Hill SSSI. Additionally it Bushfield is a key link in the Nature Recovery Network.

Soundness failure: Bushfield Camp has reverted to a valued greenfield site. It is clearly a green site to anyone who visits it. It is countryside and its allocation for major development is not justified. It conflicts with paragraph 5.63 of the Reg19 Plan. Remedy: Policy W5 should be removed as an allocated site. This site can no longer be considered previously developed land and as such, having in mind its location in the countryside and within a settlement gap, should not be allocated for development of any sort. the only appropriate uses for the site of the Camp in planning decisions since WW2 were agriculture and recreation. + Location of Bushfield Camp in the landscape The allocation of Bushfield Camp at Policy W5 of the Reg19 Plan is unsound because it is not justified. It conflicts with policies SP3, NE7, NE8, NE9, NE14 and W5(x) of the Plan and with Paragraph 180 of the NPPF. To overcome this failure and to ensure that the Plan is sound the allocation W5 should be removed from the plan.

Development should not threaten the generally open and undeveloped nature of the open countryside and in the Winchester – Compton Street settlement gap. The Bushfield site is now an open part of the landscape which is rural in character and landscape character is a topography of open, rolling chalk downland. This is an area of exceptional landscape value. The Bushfield Camp area is an important link between the distinctive landscapes of Compton Ridge and the Whiteshute/Bushfield north areas. Its value lies in its openness which maintains the continuity of the 'green wedge' that penetrates the heart of the city from the south- west. it is important for the whole setting of the city. The backdrop of the downland on Bushfield and at Whiteshute Ridge are dramatic and convey a remarkable sense of stability and continuity. The Bushfield Camp site is within Character Area I – The Hursley Scarplands and forms the view from the cathedral, St Cross, and from St Catherine's Hill which should not be a multistory carpark and hotel lit up at night. We must continue to resist visually intrusive developments on elevated ridges. The floor area and building heights proposed on an elevated site will be visually intrusive, emission of light at night, and have an impact on the tranquillity of the environment with the activity and movement that the development will generate.

Remedy Maintain Settlement Gaps as in Policy NE7 Maintain Policy NE9: Landscape Character.

	<p>Maintain Policy NE14: Rural Character Avoid development that damages the elevated site.  Keep Bushfield in agricultural use as in previous planning decisions. This can embrace the city  + Increased Traffic causing damage and contradicting other local and national policy  Policy W5 is unsound. It is not effective because it does not provide clear requirements to ensure that development would be consistent with the Council's Carbon Neutrality Action Plan's target of net zero greenhouse gas emissions by 2030. It would conflict with Policy CN1 of the Reg19 Plan and with national policy in paragraph 11a and para 159 (previously 158) of the NPPF.  This allocation is not consistent with national policy, notably paragraph 108 (was 110) (b) of the NPPF, as there is no evidence that it has been prepared with the active involvement of the highways authority or neighbouring council/s. Sections iv and v of Policy W5 are so vague that they risk transport emissions that would undermine the Council's Carbon Neutrality Action Plan's target of net greenhouse gas emissions by 2030. Bushfield is remotely situated from other activity areas and public transport facilities, and as such will pose major difficulties for keeping its transport emissions low enough. It is difficult to see how such a development will avoid excessive additional transport emissions in a district where transport emissions are already unsustainably high. Locating the proposed activities elsewhere in Winchester Town would present fewer problems.</p> <p>The developer's calculations estimate that an additional 4,542 car journeys per day would be generated. Roads around the development were estimated to experience an increase in traffic of between 17 to 37%. Using government conversion factors, 'Save Bushfield' calculate that the modelled increase in traffic would produce 6.15 KtCO<sub>2</sub>e extra emissions annually. The development risks transport emissions that would undermine the Council's Carbon Neutrality Action Plan's target of net greenhouse gas emissions by 2030.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p><b>REMEDIES</b>  Policy W5 should be removed as an allocated site.  This site can no longer be considered previously developed land and as such, having in mind its location in the countryside and within a settlement gap, should not be allocated for development of any sort. the only appropriate uses for the site of the Camp in planning decisions since WW2 were agriculture and recreation.  Maintain Settlement Gaps as in Policy NE7  Maintain Policy NE9: Landscape Character.  Maintain Policy NE14: Rural Character  Avoid development that damages the elevated site.  Keep Bushfield in agricultural use as in previous planning decisions. This can embrace the city.  Do not increase traffic emissions to Bushfield and avoid conflict with the Council's Carbon Neutrality Action Plan's target of net zero greenhouse gas emissions by 2030.  Focus employment development in the centre with existing capacity and transport links.</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>	W5
<b>Name of respondent (or client)</b>	Ellen Satchwell
<b>Personal reference number</b>	BHLF-AQTS-3282-8 - Natural England
<b>Full reference number</b>	BHLF-AQTS-3282-8 - Natural England/14/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We have been in discussions with Winchester City Council regarding potential alone impacts through air pollution on the River Itchen SAC from this allocation. Please see the Habitat Regulations Assessment section of this letter for our further comments on this issue. We are also in discussions with the applicant regarding nutrient neutrality mitigation, we would advise that this policy is expanded to require any potential onsite wastewater treatment works is accompanied by an assessment of impacts to the River Itchen SAC through discharges from the WwTW including groundwater modelling, and will require the agreement of both Natural England and the Environment Agency.
<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.</i>	Yes <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</a> <a href="#">Form (commenting on Air Quality only)</a>

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

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Extinction Rebellion Winchester
<b>Personal reference number</b>	ANON-AQTS-32N9-5
<b>Full reference number</b>	ANON-AQTS-32N9-5/4/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Inadequate evidence of need. The National Planning Policy Framework states in paragraph 31 (page 11) that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”. The Employment Land Study 2024 states in paragraph 10.5.1 (page 117) that “Overall, the forecasts based on the past completions trend and average of the three labour demand forecasts with WFH adjustments provide the most reasonable and robust estimate for future employment land needs. This shows a need for the 2022-40 period of around 24.3ha – 26.7ha for B2/B8 space, and 3.3-12.2ha for office space. This shows an overall total need for 27.6ha-38.8ha of employment land”. Paragraph 10.6.1 states that “The Council’s current employment land supply (as of March 2022) shows an existing supply of approximately 50ha: 20ha at sites with extant planning permission; and 30ha at allocated sites. It is noted that the exact quantum and typology of employment land to come forward at the allocations is currently uncertain. However, the current identified supply suggests sufficient employment land to meet identified needs”. The existing supply of approximately 50ha does not appear to include any employment supply from the employment allocation for Winnall (Policy W6). The Proposed Submission Local Plan (Regulation 19), states in paragraph 12.67 (page 338) that the policy “recognises the need to maximise opportunities to create additional B2 and B8 employment floorspace...”. Section 10.4 of the Employment Land Study 2024 (page 115) relates to ‘Needs for Office Land’. Paragraph 10.4.2 states that “The WFH Sensitivity Scenarios have resulted in reductions to the future office land requirements shown in the baseline forecasts reflecting the expected impacts of these changes. The average of these forecasts shows a need for 12.2ha of office land”. In contrast, paragraph 10.4.3 states that the “forecast based on past completions trend shows a much lower requirement for 3.3ha of office land” and that “...due to increased levels of home working...the completions trend forecast could be considered as a lower end of the range for office needs. Paragraph 10.4.3 states that “Working practices remain unsettled and a ‘new normal’ is yet to settle... Therefore, we recommend the Council take a cautious approach to any widescale rationalisation of Winchester’s office stock until more evidence is available”. However, there is clear evidence that employers have already undertaken widescale rationalisation of office accommodation in the town centre. There is currently 0.5ha of available office supply on Southgate Street alone, and Hampshire County Council have</p>

also put Three Minsters House, Four Chimneys Family Centre, and their Monarch Way site on the market totalling 0.6ha of office space.

Paragraph 4.1.7 (page 60) states that “An identified area of concern for stakeholders with regard to office space was parking. It was noted that parking in Winchester Centre is becoming increasingly constrained, and this was impacting the demand for central office space, as well as the number of employees working from the office where hybrid work styles are offered”. It appears rational, considering the empty office space available in the town centre, that the lower requirement of 3.3ha could well be the higher end of the range of required supply, and that the required supply could be adequately accommodated by the empty office space, other smaller allocations, and new office space to be created within the employment allocation at Winnall, rather than the Bushfield Camp allocation. Paragraph 4.1.7 also states that “It was suggested that the development of a multistorey car park or an extension of the park and ride to provide an increased service to Winchester City Centre could help to address this, stakeholders considered that the development of Bushfield Campus could also address this, by providing offices with different specifications such as parking to accommodate differing business needs”. If parking is an issue in the town centre then we urge the Planning Authority to address the problem, rather than relocating office accommodation to Bushfield Camp, as this will compete with and detract from the town centre. The Proposed Submission Local Plan (Regulation 19), in paragraph 10.37 (Page 269) of the Bushfield Camp allocation, states that “The Council has approved a Concept Masterplan which indicates that approximately 59% of the total development of 20 ha will be offices. Therefore, it is considered prudent to estimate that this site will deliver 11.8ha of those uses over the plan period”. We do not consider that the need for the employment allocation at Bushfield Camp, and specifically the need for 11.8ha of office space, to have been adequately demonstrated. It is likely to undermine the town centre and will result in reduced trade to businesses that are supported by office workers and eventually to the empty town centre offices being converted to residential. Policy W5 is contrary to the proposed mix of use. Paragraph 12.57 – Master planning (page 333) states that “The unique characteristics of the site, which is the subject to further testing through the master planning process, may be suitable for high quality flexible business and employment space, education and creative industries, innovation hub along with the potential for complementary uses, that are appropriate for such a unique location, rather than main town centre uses which could and should be routinely accommodated within or adjoining the town centre”. Criterion iv. of Policy W5 – Bushfield Camp (page 335) states that the proposals must “demonstrate that the uses on the site would not compete, detract or undermine Winchester Town Centre”.

The current proposals on the site state that the proposed uses include “office (Class E), research and development (Class E), academic uses and academic accommodation (Class F1/Sui Generis) a hotel (Class C1) and other complementary/ancillary uses including a nursery (Use Class E), retail uses including shops (Use Class E) restaurants/cafes/bars (Use Class E), visitor space/exhibition space (Class F1), leisure and sports uses (Use Class F2)”. These are all uses that are routinely accommodated within the town centre and

could be accommodated there. We note that the allocation for Station Approach includes possible uses that include a hotel and student accommodation and that the allocation at the Former River Park Leisure Centre site also includes leisure and sports uses. Incorrect classification for current use. The Planning Authority have not appropriately classified the current use of the Bushfield Camp allocation within the Proposed Submission Local Plan (Regulation 19). The current use of the site is community recreational use and site of importance for conservation. We consider that the classification of F2 'community use' is a more appropriate classification than 'former army base'. Although Sites of Importance for Nature Conservation (SINC) are sui generis, nature reserves are often classified under F2 if they have public access. The wording of Bushfield Camp employment allocation within the Proposed Submission Local Plan (Regulation 19) suggests that the Planning Authority are treating the site as a 'brownfield site' for example, paragraph 12.58 on page 333 states "Maximise the site wide opportunities...". We do not consider that that the sites designation as a Site of Importance for Nature Conservation is compatible with a mixed-use development that maximises the development opportunity of this site. We urge the Planning Authority to ensure that the notable habitats and species are protected.

Protected Landscape and dark night skies. Paragraphs 182 of the National Planning Policy Framework (Page 52) states that "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas". The Bushfield Camp site is located next to the South Downs National Park. Natural England have stated that "The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal". The National Park Authority have raised significant concerns regarding the quantum of development proposed at the site, however, rather than restricting the development at the site, the Planning Authority appear to have conceded to the aspirations of the developer and have modified the allocation from employment to 'mixed-use' to enable the development of the 100bed hotel and 525bed student village. The South Downs National Park Authority have commented that the current proposed development "...proposes more floorspace than the maximums previously discussed and taller maximum building heights... This also goes against the stated intention for the scheme to be truly landscape-led". The Winchester Landscape Officer has commented on the current development proposals and has stated that he has no objection regarding impact on landscape – "Winchester is not a fossil; it is a town which needs to continue to grow and adapt, like it has done through the centuries. Development of the site, if it was sensitive to its context, would not necessarily harm the landscape setting of the town or the SDNP. It would be a visible and memorable new landmark, in much the same way as the Hospital's Butterfield Wing on West Hill was in 1868, or the Winchester Science Centre on Morn Hill was in



2002". We consider that the Bushfield Camp development will have a much greater impact than either the hospital or the Science Centre, and if the development is not scaled back considerably, it will end up being an eye sore.

Policy NE8 – South Downs National Park (Page 160) states that "Development in close proximity the South Downs National Park will only be permitted where... they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park". We urge the Planning Authority to require a lighting strategy which considers the biodiversity sensitivities of the site, for example nocturnal wildlife. Use of development master plan and outline application inadequate due to significant effect on the integrity of European sites. In summary, both the Habitats Directive (see Article 6(3) of Habitats Directive 92/43/EEC) and the Conservation of Habitats and Species Regulations 2017 (see Regulation 63 to Part 6) require thorough assessment to ensure that plans or projects do not harm the conservation objectives and integrity of European sites. The Bushfield Camp site allocation has the potential to have significant effect on the integrity of the River Itchen SAC due to recreational pressure (including on S1044 Damselfly *Coenagrion mercuriale* and S1355 Otter *Lutra lutra*), poor water quality due to surface water run-off, and increased air pollution from increased traffic movements. The site allocation also has the potential to have significant effect on the integrity of the River Itchen SAC, Solent Maritime SPA and Ramsar site, and Solent and Southampton Water SPA and Ramsar Site, through eutrophication caused by increased nutrient discharges in foul wastewater. The Bushfield Camp allocation includes a hotel and student accommodation. The Statement of Common Ground between the Planning Authority and Natural England (page 7) states that "New 'overnight' accommodation necessitates the provision of connections to the foul water drainage network and can increase surface water run-off. This can increase the amount of nutrients entering designated Habitat Sites (Special Protection Areas and Special Areas of Conservation). Natural England advised that there is a significant effect on Habitat sites from overnight accommodation and that nutrient neutrality should be demonstrated to avoid detrimental impacts on the protected sites".

A Habitats Regulation Assessment is required for the site. Policy W5 criterion xv. (page 336) states that "...adequate measures in line with Policy NE1 and Policy D7, will be put in place to avoid or mitigate any adverse effects. Such measures must be agreed with the Council and Natural England". However, Paragraph 12.60 (Page 334) states that "The policy enables the development of this site to meet future, currently unidentified, needs that will be identified through the planning process". It will be extremely difficult for the Planning Authority and Natural England to ensure mitigation effects of a development on European sites, when there is no evidenced need for the development, and the quantum of development has not been finalised. We consider the use of a development master plan and outline planning application to be inadequate due to the potential significant effect on the integrity of designated sites. We question the lawfulness of this approach and urge the Planning Authority to require a full planning application to ensure that all aspects of the development are thoroughly reviewed upfront. Use of development master plan and

outline application inadequate due to significant effect on the integrity of other designated sites. The Bushfield Camp site allocation has the potential to have significant effect on the integrity of the River Itchen SSSI, St Chatherine's Hill SSSI, and the HIWWT nature reserve, due to increased recreational pressure (including on Annex 1 listed birds Woodlark and Nightjar). Sites of Special Scientific Interest and their officially recognised features/species are protected from activity that may have a significant effect on the integrity of the site by the Wildlife and Countryside Act 1981. Paragraph 186 of the National Planning Policy Framework states that "...development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted". The site allocation will also cause the direct loss of the Site of Importance for Nature Conservation (SINC) within the site. The SINC supports an array of notable protected species including White Helleborine, Tor-grass, Cinnabar, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Linnet, and Red Kite. The SINC contains key priority habitats, including Lowland Meadows, Lowland Calcareous Grassland, and Lowland Mixed Deciduous Woodland. The allocation site also supports Hazel Dormouse (*Muscardinus avellanarius*) which are also a notable protected species.

The Bushfield Camp site is also a key 'arc site' in the local Nature Recovery Network and is important for maintaining a district wide network of local wildlife sites and corridors to support the biodiversity network, prevent fragmentation, and enable biodiversity to respond and adapt to the impacts of climate change. Paragraph 180 of the National Planning Policy Framework states that "Planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils". Paragraph 186 states that "If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused". Sites of Importance for Nature Conservation and the biodiversity network should therefore also be protected from development.

The currently unidentified need for development and undefined quantum of use and scale of the proposed allocation will make it extremely difficult for the Planning Authority to mitigate the effects of development on the SSSI, SINC, notable protected species, and local biodiversity network. We consider that the use of a development master plan and outline planning application to be inadequate due to the potential significant effect on the integrity of these designated sites. We urge the Planning Authority to require a full planning application to ensure that all aspects of the development are thoroughly reviewed upfront. We also urge the Planning Authority to ensure that Natural England are appropriately consulted regarding the increased recreational pressure on the Sites of Special Scientific Interest. Assessment of sites in combination. The Habitats Regulation Assessment must consider other projects 'in combination' where they also have potential to effect the integrity of the European Sites. The Sir John Moore Barracks allocation (Policy W2) states in paragraph 12.52 (page 332) that "The site is located within the upper catchment of the River Itchen and feeds

one of the River Itchen's tributaries known as Nuns Walk Stream. Development of the land therefore has the potential to impact upon the nationally protected site of the River Itchen SAC and other sites in the wider Solent area in terms of nutrients (phosphates and nitrates) in wastewater produced by new housing and other forms of overnight residential accommodation". We urge the Planning Authority to ensure that the River Itchen SAC is appropriately protected. The Planning Authority will also need to consider the impact of other projects 'in combination' where they have potential to have a significant impact on the local biodiversity network. For example, the Sir John Moore Barracks allocation (Policy W2) is another site which contains a SINC and candidate SINC, with similar notable protected species and habitats to the Bushfield Camp allocation, and also a colony of Hazel Dormouse. We urge the Planning Authority to consider the potential catastrophic 'in combination' effect that the development of both sites is likely to have on the integrity of the SINC's and local biodiversity network. Significant effect on the integrity of European Sites cannot be ruled out.

Paragraph 5.54 of the Habitats Regulation Assessment (page 108) states that "...likely significant effects would arise from the Local Plan alone and also in combination with other plans and projects, due to an increase in phosphorus (Itchen only) or nitrogen from residential/overnight accommodation development discharging waste water into the Itchen, Test or East Hampshire catchment". Paragraph 5.59 states that "All developments that result in new overnight accommodation within the Itchen catchment (and the whole Plan area) are required to achieve nutrient neutrality, in line with Natural England's requirements for mitigation, and as set out in Policy NE16". Paragraph 5.65 states that "The lack of strategic mitigation for some of the site allocations does not mean that there will be adverse effects on integrity of Habitats Sites, as Policy NE16 ensures that development would need to demonstrate that it was nutrient neutral (for example by proposing on-site wastewater treatment) before permission was granted; although this may prevent some development from coming forward". However, Natural England, in their response to the proposed development at Bushfield Camp, have advised regarding onsite waste water treatment prior to discharge, that "this is not a suitable mitigation measure. Although the PTP would mean cleaner water would reach the WwTW, there will still be an increase in flow, therefore this does not necessarily mean that it would reduce the total phosphorus load discharged from the WwTW. We therefore do not consider that Policy NE16 is sufficient to avoid significant adverse effects on the integrity of the European Sites.

Paragraph 6.5 (page 123), which relates to a Statement of Common Ground between the Planning Authority and Natural England, states that "Capacity within the Test and Itchen mitigation schemes does not fully meet the required Local Plan demand for nitrogen or phosphorous. About half of the demand for nitrogen is met, but only a small proportion of the phosphorus demand. Work to identify additional mitigation is in progress and the nutrient topic paper states that "Winchester District Council are in line to receive a portion of the funding to deliver upgrades to two Council owned projects". We also therefore do not consider that the Planning Authority is able to rule out adverse effect on site integrity as they are unable to confirm if their proposed strategic mitigation measures are viable. Where the plan fails the integrity test the plan cannot be

adopted. The Government guidance on ‘Habitats regulations assessments: protecting a European site’, states that “If the proposal fails the integrity test because you cannot rule out an adverse effect on site integrity, you must reject the proposal in its current form. This means permission is not granted. The work cannot go ahead or the plan cannot be adopted unless it can pass 3 legal tests and be granted an exception, known as a ‘derogation’”. In considering the tests for derogation, the Planning Authority must consider feasible alternative solutions which include alternative sites and doing nothing, as well as mitigation measures. We urge the Planning Authority should explore whether there are other suitable locations for the proposed activity, and as the current proposed uses are all routinely accommodated within the town centre, this should be considered. The Planning Authority also need to explore the option of doing nothing at all; sometimes the best option, if the potential harm outweighs the benefits, is to refrain from developing a site. The Planning Authority should also explore if the development can be constrained to reduce the impact that development. We urge the Planning Authority should to explore restricting the intended use of the site to F2, which will protect the space for public recreation and as a SINC and reduce the impact of development on the integrity of the European sites and biodiversity network. We consider that the local plan cannot be adopted as:

- i) There is potential for a significant effect on the integrity of European sites.
- ii) The Planning Authority is unable to rule out adverse effect on site integrity as they are unable to confirm if the mitigation measures are viable.
- iii) The Planning Authority have not considered derogation.

Representations not considered. Local planning authorities are required by law to take adequate account of representations they receive during consultation periods. Article 6(3) of the Habitats Directive also requires the Planning Authority to take account of public opinion when completing a Habitats Regulation Assessment – “...the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public”. In the case of *Trusthouse Forte v SSE* (1987) 53 P&CR 293, 299-300, the court held that where there are clear objections to development on a particular site, particularly where the development will have a significant adverse effect, then it may be necessary to consider where there is a more appropriate site elsewhere. This was approved by Court of Appeal in the case of *R (Mount Cook Land Ltd) v Westminster CC* [2017] PTSR 116 (See paragraph 30). There have been hundreds of objections and concerns raised from the public, statutory consultees, and other stakeholders to the current proposals on the Bushfield Camp site. So far nearly 80,000 people have also signed a petition to get the Church Commissioners one of the UK’s biggest landowners, and who own the Bushfield Camp site, to re-wild their land across England and Wales. The public consensus is clearly against the development of the Bushfield Camp site allocation. The Planning Authority do not appear to have any of these representations into account and have not made any significant changes to the allocation since the Regulation 18 plan. Instead the Planning Authority appear to have only considered the views of the developer and are supporting them to maximise the development opportunities.

	<p>For example, the Planning Authority have changed the allocation for employment in the current local plan Part 1 (Policy WT3) to one of 'mixed-use' in the emerging Local Plan.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The Planning Authority should:</p> <ol style="list-style-type: none"> <li>1. Review the Employment Land Study 2024 in consideration of the considerable amount of empty office space available in the town centre, and ensure that there is appropriate need for the employment uses.</li> <li>2. Review the policy to ensure that uses that are routinely accommodated within the town centre cannot be built on the Bushfield Camp site.</li> <li>3. Review the current classification and rather than stating the site is a brownfield site, and classify the current use as F2 'community use', rather than maximising development opportunities, the site should protect the site for public recreation and the notable habitats and species on the site should be protected.</li> <li>4. Ensure that the allocation is truly landscape led and that the floorspace and proposed height of development are restricted. Require a lighting strategy which considers the biodiversity sensitivities of the site, for example nocturnal wildlife.</li> <li>5. Require a full application to ensure that the effect on the European sites can be appropriately mitigated.</li> <li>6. Require a full application to ensure that the effect on other designated sites.</li> <li>7. Review the impact of other projects 'in combination' where they have potential to have a significant impact on the local biodiversity network. For example, the Sir John Moore Barracks allocation (Policy W2) is another site which contains a SINC and candidate SINC, with similar notable protected species and habitats to the Bushfield Camp allocation, and also a colony of Hazel Dormouse. Considering the the potential catastrophic 'in combination' effect that the development of both sites is likely to have on the integrity of the SINCS and local biodiversity network.</li> <li>8. Rule out significant effect on the integrity of European sites.</li> <li>9. Where significant effect cannot be ruled out, look at feasible alternatives including alternative sites and doing nothing, as well as mitigation measures.</li> <li>10. Consider the significant number of public and stakeholder objections and concerns raised regarding the development.</li> </ol>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The Policy W5 intro should be amended to 'Land at Bushfield Camp, Winchester is allocated for F2 'community use'. Elements of craft and creative industries may also be acceptable. Development proposals will need to accord with the following:'</p> <p>The following criterion should also be amended:</p> <ol style="list-style-type: none"> <li>i. Due to the potential significant effect of developing this site on the integrity of European sites, other designated sites, and the local biodiversity network, a FULL application is required to ensure that development is thoroughly mitigated;</li> <li>iii. Buildings on site are restricted to 5ha, heights are restricted to 2 storeys and only to be built on land previously occupied by the former army base.</li> <li>ix. delete</li> </ol>

	<p>x. to also require lighting strategy which considers the biodiversity sensitivities of the site, for example nocturnal wildlife.</p> <p>xiv. to also include an assessment to review the the possible in-combination effects on other designated sites and the local biodiversity network (including Sir John Moore Barracks allocation).</p> <p>Where significant effect cannot be ruled out, look at feasible alternatives including alternative sites and doing nothing, as well as mitigation measures.</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>	W5
<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-3/4/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	current proposals need to incorporate far more space and corridors for wildlife and reduce the inappropriate size and proposed type of multi-use which would greatly increase traffic and pollution.
<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 NE1)</a> <a href="#">Email (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Gareth Osborne
<b>Personal reference number</b>	ANON-AQTS-32NY-5
<b>Full reference number</b>	ANON-AQTS-32NY-5/1/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>I believe the policy to be unsound as follows:</p> <ol style="list-style-type: none"> <li>1. This policy does not recognise the allocations' Site of Importance to Nature Conservation (SINC) status &amp; therefore offers no protection to this important habitat. In doing so there is a risk of not achieving the statutory BNG requirement of the Environment Act 2021 &amp; serious conflict with policies NE1 &amp; NE5. Paragraph 7.14 of the Local Plan states Wildlife sites and habitats within this area and across the district that are of regional and local importance include 17 SSSIs, almost 600 Sites of Nature Conservation (SINCs) and 9 Local Nature Reserves (LNRs). These sites support important natural assets, such as ancient woodlands, grasslands and chalk rivers. These sites will be protected, with opportunities for enhancement encouraged. Within other allocations of the Local Plan, such as BW1 Tangier Lane &amp; W2 St John Moore Barracks, the SINCs present are specifically referenced within the allocation policy. Why not for W5 and are there other allocations with SINC, or indeed other designated status where this has also been omitted? With this lack of recognition of Bushfield's SINC status &amp; in the absence of evidence that the site has been recently assessed (as previously developed land/partial brownfield) for its suitability (&amp; not other alternative sites) to be developed as outlined in W5, I consider it to be unsound &amp; not justified. My understanding is that registered 'brownfield' sites should be routinely assessed to ensure that status still applies - Bushfield has been laying fallow for longer than it was ever in use for human activity as a military training camp &amp; the site has blended back into the landscape.</li> <li>2. This allocation is currently subject to an undetermined planning application. This planning application was informed by a Concept Masterplan heavily referencing policy W5 of this draft Local Plan, which was approved by Cabinet in June 2023. At this meeting concerns were raised with Cabinet of this allocation, and over the consultation exercise undertaken by developers to inform the approved Concept Masterplan. The consultation drew criticisms of: key aspects of proposals presented to consultees/residents unclear or absent, cherry-picking of stakeholders feedback &amp; no meaningful consultation at all with others prior to the Masterplan completion. In approving the Concept Masterplan in June 2023 has WCC not already pre-determined W5 of this draft Local Plan? Was this not premature in light of this consultation the public are now again being asked to contribute to. On this basis, I believe policy W5 to be unsound in terms of the tests - Positively Prepared &amp; Justified.</li> </ol>



<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	W5 Bushfield Camp to be removed
<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>	W5
<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/16/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.” Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.
<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>	W5
<b>Name of respondent (or client)</b>	Jamie Matthews .. Clerk
<b>Personal reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council
<b>Full reference number</b>	ANON-AQTS-32N7-3 - Twyford Parish Council/3/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>W 5 Bushfield camp: objection by Twyford Parish Council</p> <p>Summary: Twyford Parish Council (TPC) will be impacted directly by this development in the following respects:</p> <ul style="list-style-type: none"> <li>• views across the valley from the east side of the Valley, from Twyford Down, Hockley Golf Course, numerous footpaths and other positions in the village.</li> <li>• traffic generated by the new development which will increase the usage of B3335 , the Shawford Road and Hazeley Road</li> </ul> <p>TPC considers that these effects are contrary to purposes of the National Park both in their effect on Natural beauty and their impact on the social and economic life of the Twyford community .</p> <p>In support of its objection, TPC adopts as its own the submissions of the Save Bushfield Campaign to which TPC have contributed. TPC has the following additional submissions</p> <ol style="list-style-type: none"> <li>1. Lack of need in Winchester City; there is an extreme imbalance between: <ol style="list-style-type: none"> <li>a. the numbers of jobs in the city and the resident economically active population</li> <li>b. the percentage of those jobs filled by local people.</li> </ol> </li> <li>2. There is no need for additional jobs in the city or its vicinity and any justification for employment land can only be based on the needs of local firms.</li> <li>3. 2/3 employees will be commuters and will be primarily reliant on the private car.</li> <li>4. The B3335 route through Twyford will be further impacted to its detriment and with consequent impact on Twyford and SDNPA)</li> <li>5. It will provide the wrong type of employment for the city which needs sheds and small business units not office space</li> <li>6. The proposal for business park appears high risk and is not supported by examples of success; the rents S of Reading have not been sufficient to not sufficient to generate viable business park.</li> <li>7. There are better locations for meeting Winchester's needs <ol style="list-style-type: none"> <li>a. as identified by Stantec for the City either N of Barton farm/ Wellhouse Lane or S of RAPC ( E of A34) where the land is less sensitive and constrained.</li> </ol> </li> </ol>

b. Alternatively in other places in the South Hampshire part of the District where new housing is concentrated.

A. Twyford's position in relation to Bushfield, - visual, transport, policy

1. Twyford lies due east of the Bushfield site and occupies the eastern side of the Itchen valley immediately south of St Catherine's Hill including floodplain and the high ground of Twyford Down (on both sides of the M3), Hockley Down and the Golf Course. From here there are grandstand views of Bushfield camp.

2. Twyford village is bisected by B 3335 which carries approx. 16,000 vehicles per day through the centre of the village; it is a subregional distributor road linking to M3 junction 9 and the Badger Farm Road; it is a major commuter route into Winchester. The road is substandard or in almost every respect; it is congested, a polluter and has a negative impact on village life and the fabric of the village.

3. Twyford is a village with multiple facilities; it provides services for a much wider population than its own, out of proportion to its size, in education, health, employment, recreation, social facilities (including pubs etc); it is a centre of open-air recreation especially walking but golf and horse riding.

4. Twyford Neighbourhood plan (TNP) was adopted in 2022 and is the most recently approved part of the Development Plan. Landscape is central to its proposals and supported by a bespoke landscape study. It augments the South Downs National Park local plan. TNP policies LHE 1 -5 contain policies for the protection of landscape, historic landscape, gaps, green infrastructure, ecology and archaeology, in particular the Valley of the Itchen. These policies are all framed with reference to the wider landscape beyond the parish boundary, recognizing that it forms an important part of the setting of Winchester. Bushfield has always been part of this wider setting.

5. Twyford is also subject to development pressures of its own. There are several current planning applications including housing in the centre of the village.

6. Planning permission has been given in the last three months for the comprehensive redevelopment, modernization and intensification of the Northfields farm/Hazely Enterprise park a 5.5 ha commercial site. Total floorspace approx. 15,000 sq. m and delivering 300 jobs. This is approx. 1 m from Bushfield and visible from it on the East side of the Valley.

7. Twyford is wholly within the South Downs National Park; it contains significant cultural historical ecological and landscape assets including ones of national importance in each category. WCC is bound by statute to take account of the National Park and its purposes when making its decisions.

B. The imbalance between resident workers and jobs in the City; the problem of in-commuting.

There is one major issue which does not appear to have been considered by any of the other parties or consultees. It is the excess of employment within the City of Winchester. Successive economic reports have drawn attention to the fact that employment in the city far exceeds the numbers of economically active people; the jobs are filled by in-commuting. The imbalance is made still worse by the high level of out-commuting from Winchester. This imbalance is of long standing and was identified by Hampshire County Council in the early 1970s as a basic reason for resisting further employment growth in the Winchester City part of the District.

Despite this policy of employment restraint, many of the established institutions in Winchester City grew in this period, for instance the Hospital, the University and schools and colleges such as Peter Simmonds, Sparsholt, and other schools, offsetting other declines. Winchester has long been dominated by public service employment and continues to be so. One major cause of the imbalance is that house prices in Winchester are high and that Winchester jobs are not highly paid; salaries have not been sufficient to meet the costs of Winchester's houses. Consequently, most of the commuters live in the cheaper, better value housing available in the large urban and suburban areas to the South,- Bishops Waltham, Fair Oak, Eastleigh, Southampton Romsey, Chandlers Ford etc . While there is some public transport by train and bus, substantial numbers come by car. The most up to date and easily accessible source for these statistics is the Stantec study commissioned in 2020 for Winchester City Council as part of the local Plan Evidence base.  
file:///C:/Users/Wow/Downloads/Winchester%20ELR%20March%202020%20Apr%20FINAL%20(32).pdf  
This study gives the total number of city-based jobs as 28,705 but of these only 7900 i.e. 27% are Winchester residents. The rest - 19,745 - are in-commuters. Two things follow from this: firstly, Winchester City has no need for additional employment. Secondly assuming the new jobs proposed at Bushfield (3369) have the same percentage split, 73% (2460) will be commuters and only 27% (910) will be filled by local people. See Stantec Report p 30 ; the diagrams show the commuting patterns with B3335 a major route. This imbalance increases dependence on the car and the need to travel so is not sustainable ; it is contrary to the policies:

1 in the NPPF seeking to reduce dependence on the private car. This is a matter which has significantly increased in importance since the Winchester local plan was adopted in 2013. It is of sufficient weight in its own right to justify reconsideration of the Bushfield allocation .

2. The Partnership for South Hampshire spatial strategy e.g. section 5 : “Achieving the transition to net zero carbon will require a fundamental modal shift in transport to zero and low carbon travel, including active travel and public transport. Site selection and capacities will need to be optimised to promote modal shift and avoid car dependency where possible. “Where possible, housing need will be met. This will be through a combination of strategic and smaller sites allocated in local plans, where appropriate.

“Housing growth needs to be balanced with economic growth.

“Growth will be focussed in existing urban areas with ‘cities and towns first’ and/or in locations that support modal shift in transport.” <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/>

3. WDLP review see for instance para 10.1: “10.1 Nationally and locally there is the need to de-carbonise the economy and address climate change. The council has declared a climate emergency and developed a Green Economic Development Strategy to create a greener, more sustainable and inclusive economy, in line with its ambition for the Winchester District to be carbon neutral by 2030.”

The allocation of Bushfield as a major attractor of employment adjacent to Winchester City appears to fly in the face of the sustainability principles of NPPF, PfSH and of the City itself. This point has not been addressed in any of the Local Plan review documents. It is possible that WCC commissioned the 2024 study of ETCUS

because the STANTEC study showed so clearly the problems raised by the Bushfield allocation for sustainability . The ETCUS study is much more generalised and less informative. It does not give similar or such specific land use information as the STANTC study.

C. The impact of additional commuting to Bushfield on the feeder roads in particular B3335  
A consequence of the Bushfield proposal will be that 2460 additional commuters will be coming into Winchester. Of these, 50% are likely to come from the southeast namely Eastleigh and rural Winchester and Fareham with 12% coming from Southampton. Apart from the M3, the principal access Rd is the B3335 which passes through Colden Common and Twyford and is currently taking 16,000 vehicles a day. Twyford is in the South Downs National Park so that is another consideration as is the historic centre of Twyford which is a conservation area. It passes too through the length of Colden Common. The B3335 is already heavily congested. As this road serves existing very large populations where there are limited employment opportunities, and is regularly jammed and over capacity, existing commuters will be disadvantaged as will employers in Winchester. B3335 will also remain the principal link north to M3 and Winchester, serving the further new housing proposals currently under construction in Eastleigh and Bishops Waltham. It is possible that 1000 extra vpd need to use the B3335 and so will come through the village centre. The substandard aspects of the B3335 through Twyford have been noted above in A 3. They are more fully described in TNP section MA on Movement and Access.

D. It will provide the wrong type of employment for the City.  
The Stantec report identifies the needs of the City area as for sheds for smaller businesses. What is proposed for Bushfield is high-end, high-quality building, expensive to build and run with many amenities and high-quality environment. The cheaper buildings need for workshops and smaller businesses and factories would not deliver the quality of design or sense of place to which Bushfield clearly aspires. To meet the City's, need for simpler cheaper space a further allocation would be needed.

E. The proposal for business park appears high risk.  
Attached to the Planning Statement submitted by Litchfield's on behalf of the Owners and in support of the application is a report by Knight Frank discussing the prospects for the success of the Bushfield allocation as a business park. it is fascinating reading but is not re-assuring. The study describes proposals which have succeeded in the favoured areas of Reading and the M25 but have failed further out from M25 along the M3 Corridor. It explains that rental values have not supported new commercial building for many years and gives instances of failures. It details the difficulty developers have had of securing tenants to underpin the schemes. Winchester is far beyond the M25 influence with the Blackwater Valley towns and Basingstoke in between. There is no help from the Southampton end of the M3. Southampton has also had aspirations to boost its economy with office building and this underpins the long-held strategy of the South Hampshire districts and cities in the current spatial strategy. But over the 30 or more years of the policy, the office building so much desired simply has not happened and so provides no encouragement to Bushfield.

The Knight Frank report gives reasons why Bushfield is so speculative namely that rents achieved is this part of Hampshire would not justify the building of a high spec., high design, high-cost high maintenance proposal.

The Knight Frank appears to indicate a high likelihood of failure. I am not aware of WCC having commissioned a report of its own to give a second opinion on viability. There is a risk of failure here but no risk assessment or any indication of how failure would be handled. The site has had the benefit of a commercial allocation for over ten years but has remained undeveloped. Now a residential element (more low-cost student accommodation?) is included in the current version of W4, presumably to underpin the finances of the scheme. This was absent in the earlier Local Plan and is a dilution of the earlier vision. Will the “academic accommodation” be built first while the business element remains undeveloped for a further 10 years? The vision of a dynamic business park that might justify acceptance of the multiple disadvantages and unpopularity of this policy seems unlikely to be realised on the applicant’s own assessment. Will Bushfield and all its assets be given away for a bag of beans?

F. There are better locations for meeting Winchester’s needs.

There are better sites. At the Local Plan Inquiry where WT3 was debated in 2012/13, an alternative location was discussed, namely the land north of Welhouse Lane north of Barton Farm within the curve of the A34 and served of course by the Three Maids Hill roundabout. This land is much less sensitive than the land south of Winchester and has few if any of the constraints. It can now be seen as part of a complex of sites north of Winchester with potential for expansion/ redevelopment/change of use (Barton Farm, Sir John Moore Barracks, Worthy Down and South Wonston). At that time, it was not formally proposed or supported by adequate information. Now the proposals for the improvement of the A34/M3 junction provide additional scope for looking at this area north of Winchester. In contrast M3 junction 11 is threaded intricately through a landscape which contains several settlements is constrained by multiple designations, and where the highway design is substandard, and there is regular congestion and the feeder roads appear at capacity.

The proposals to increase capacity between Junctions 9 and 12 by the Smart motorway scheme have been abandoned, so there appears no means of further increasing M3 capacity south of Winchester. What capacity there is should be kept for normal growth, not utilised for speculative growth dependent upon large commuting flows, such as Bushfield. A further disadvantage of the Bushfield allocation is that it would open up the area to the SW of Winchester. It would boost the recent landowner aspirations for major development in the Compton/Olivers Battery /Hursley triangle contrary to the overwhelming wish of local people.

Is it reasonable to delete this proposal? Multiple changes have taken place over the last 12 years since the adoption of the earlier WDLP as the WDLP itself recognizes for instance in its section on the economy in para 10.3. This deals with working practices following COVID.

WT3 states that Bushfield must pass the following test : ...”delivers necessary social, economic or environmental development which could not otherwise be accommodated within or around Winchester”. This test has never been properly applied. As this submission indicates, there are multiple ways in which provision can be made and clear harm from the W3 proposal itself. The owners have had ample opportunity to implement the original allocation but have failed to do so.



	<p>There is a potential issue of lawfulness in relation to the habitats directives. Preliminary work indicates environmental harm. The directive puts in place a procedure in which alternatives are to be considered, as these may be environmentally less damaging. The precautionary principle indicates that the less damaging proposal should be preferred. In this Plan, the Allocation is taken as confirmed without the possibility of options being considered. TPC suggest a wording which gives the LPA the means of reviewing the allocation if the Environmental harm is show and other land is shown to be less environmentally damaging.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>There are three different ways of modifying this policy</p> <ol style="list-style-type: none"> <li>1.delete</li> <li>2. reinstate the policies from the present adopted plan to make the allocation contingent on certain criteria and not fully confirmed.</li> <li>3. to add further criteria to the list now proposed in W5. TPC's preferred option is the first - deletion.</li> </ol> <p>The second option would reinstate from the current plan these statements from WT1 and WT3.  WT1:"Policy WT1 - Development Strategy for Winchester Town. The spatial planning vision for Winchester Town will be achieved through:- exploring the employment opportunities presented by the site at Bushfield Camp in accordance with Policy WT3;" and WT3 "delivers necessary social, economic or environmental development which could not otherwise be accommodated within or around Winchester, does not compete or detract from the town centre, is compatible with the provision made elsewhere through this strategy, and reflects other policy statements prepared by the Council including the Vision for Winchester"  and adding. " An Environmental Assessment and if necessary, an Appropriate Assessment will be carried out in accordance with the Habitats Regulations; options will be considered. If the Bushfield allocation site is shown to be environmentally damaging , Options which are less damaging will be considered as alternative allocations." Adding further criteria to the list in proposed W5 to include: xix: the development should not be brought into use before the completion of the junction works on Junction 9 of M3</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>There are three different ways of modifying this policy</p> <ol style="list-style-type: none"> <li>1.delete W5.. TPC's preferred option OR</li> <li>2. reinstate the policies from the present adopted plan to make the allocation contingent on certain criteria and not fully confirmed. These are: WT1:"Policy WT1 - Development Strategy for Winchester Town The spatial planning vision for Winchester Town will be achieved through:-exploring the employment opportunities presented by the site at Bushfield Camp in accordance with Policy WT3;" and WT3:"delivers necessary social, economic or environmental development which could not otherwise be accommodated within or around Winchester, does not compete or detract from the town centre, is compatible with the provision made elsewhere through this strategy, and reflects other policy statements prepared by the Council including the Vision for Winchester" OR</li> <li>3. add to W5: xix: the development should not be brought into use before the completion of the junction works on Junction 9 of M3 and adding in the case of both options 2 and 3:</li> </ol>

	" An Environmental Assessment and if necessary, an Appropriate Assessment will be carried out in accordance with the Habitats Regulations; options will be considered. If the Bushfield allocation site is shown to be environmentally damaging , Options which are less damaging will be considered as alternative 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, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Johanna Cruickshank
<b>Personal reference number</b>	BHLF-AQTS-32Y3-A
<b>Full reference number</b>	BHLF-AQTS-32Y3-A/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>I have attempted to fill in the very long online form about the Local Plan but it keeps crashing &amp; we are close to the deadline. As there is a section about Biodiversity this should apply to the Bushfield site which provides important wildlife habitats &amp; biodiversity. This site needs to be protected in the Local Plan.</p> <p>The purpose of the proposed buildings is unclear &amp; cannot begin to justify the enormous damage they will cause. Additional traffic has not been estimated properly which makes the development of this site unsound. I should add this entire process is confusing for the layman as it consists of so many specialist terms, jargon &amp; classifications which surely put any member of the public at a huge disadvantage. Our input &amp; opinions are invited but the process makes this very difficult or impossible for anyone not in receipt of this specialist education with many hours of time at their disposal. I very much hope that the Local Plan will take the concerns about the Bushfield Site into account so that it can be protected.</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>	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>	W5
<b>Name of respondent (or client)</b>	John Jennings
<b>Personal reference number</b>	ANON-AQTS-32CQ-J
<b>Full reference number</b>	ANON-AQTS-32CQ-J/1/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>W5 fails the soundness tests and conflicts with other policies in the regulation 19 Plan. The allocation is not sound as it conflicts with other policies in the Reg19 Plan and with government policy in the NPPF. The allocation also conflicts with the current adopted plan.</p> <p>The current allocation in the adopted Local Plan for the Bushfield area as 'mixed use'. This is inaccurate. The Bushfield area is designated in the adopted plan as an employment site. This designation was made prior to the COVID crisis and intervening economic conditions, both of which have had significant impact on the need for commercial employment accommodation in the City ad surrounding area.</p> <p>Policy W5 is inconsistent. If WCC intends to change the designation of Bushfield from the current 'employment' to 'mixed use' it needs to incorporate changes to this designation. It also needs to be explicitly identified in an update to Policy W5 and provision made for comments and feedback by local residents.</p> <p><b>LEGALLY COMPLIANT FAILURES / LINK WITH CURRENT UNDETERMINED PLANNING APPLICATION:</b></p> <p>The wording of W5 suggests an assumption has been made that the current undetermined outline planning application for the area will be accepted. This runs contrary to both process and law and intimates that WCC planning officials and the developers and owners of Bushfield have come to some form of informal agreement regarding the Bushfield site worthy of Private Eye Magazine's 'Rotten Boroughs'.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Policy W5 should be redrawn to respect local resident expressed views, which overwhelmingly wish to see the Bushfield area as an area for recreation and public use.</p> <p>As such, it is suggested that instead of being allocated for development on flawed grounds in the adopted plan, Bushfield should be designated in the Local Plan under review as a Local Green Space or a Country Park</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Land at Bushfield Camp, Winchester as defined on the Policies Map, is allocated for a employment high quality flexible business and employment space, an innovation/education hub and creative industries.</p> <p>In the Local Plan (egulation19) 2020-2040 this area will be allocated for recreational and community use.</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>	W5
<b>Name of respondent (or client)</b>	Judith Martin
<b>Personal reference number</b>	BHLF-AQTS-3264-8
<b>Full reference number</b>	BHLF-AQTS-3264-8/4/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	My particular concerns are with W5, Bushfield Camp, where I wholeheartedly endorse the submission made by the umbrella body that includes parish councils, the City of Winchester Trust, WinACC and others. I would stress that it is disingenuous to describe it as a 'former army camp': it was used in wartime, as were many sites that would not otherwise have been taken over such as historic houses and much open land. There was some sporadic subsequent use, but I believe it was last used over 50 years ago. Barely any of it now can honestly be called brownfield. In view of all the declarations of climate change emergency, biodiversity emergency, and general green policies, combined with lack of evidence of need for employment - the ONS says the unemployment rate is 2.7% - it should not be developed at all.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove W5 and W10, replace the text of W9 with the 2017 Highcliffe Community Plan, and make sure W3 is developed with social housing and not left at the mercy of developers.
<b>What is your suggested wording or text for the policy?</b>	This is not my job, to reword the Winchester Local Plan. My requests for change are as above.
<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.</i>	Yes <a href="#">Form (commenting on policies)</a>

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



<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Julia Abbott
<b>Personal reference number</b>	BHLF-AQTS-32YE-V
<b>Full reference number</b>	BHLF-AQTS-32YE-V/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>I wish to register an objection to the proposal in the consultation on Bushfield. The proposed building at N5 hotel is far too close to the avenue of trees. These are of particular importance with rare plants and wildlife, besides being of outstanding natural beauty. The proposed desecration of this area is appalling.</p> <p>I object on the following grounds:  There is no business case for a hotel  Traffic increase in a dangerous area near a motorway junction.  Light pollution  Loss of important natural habitat</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</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>	W5
<b>Name of respondent (or client)</b>	Julie Pedlow
<b>Personal reference number</b>	BHLF-AQTS-326H-V
<b>Full reference number</b>	BHLF-AQTS-326H-V/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Please protect the important natural wildlife sanctuary which is Bushfield. I live in Stanmore and it is very precious to those of us who live close to Bushfield in particular. All summer I have walked there, visited the cows in the spring, viewed the meteor storm from a bench there, enjoyed the wildlife, rabbit's, foxes and the like , watched the sunset almost daily. Protect the endangered lizard population which lives there and the humans who love the place and refuse any planning applications to destroy the beauty which we call Bushfield.
<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>	W5
<b>Name of respondent (or client)</b>	Kim Raybone
<b>Personal reference number</b>	ANON-AQTS-32F8-V
<b>Full reference number</b>	ANON-AQTS-32F8-V/2/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>W5 is not justified. It fails the soundness tests on several counts and conflicts with other policies in the regulation 19 Plan, including in relation to biodiversity, carbon neutrality and transport. It is situated in open countryside and in the Winchester – Compton Street settlement gap as set out in Policy NE7 of the Regulation 19 Plan. Policy NE7 states, with regard to settlement gaps: 'Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.'</p> <p>Whilst the decision to prioritise brownfield sites for development is deeply flawed and reflects thinking that is decades out of date within the scientific literature, Bushfield Camp should no longer be viewed as simply 'brownfield'. Bushfield Camp has now become extremely biodiverse, designated a Site of Importance for Nature Conservation (SINC) and is home to protected species including Hazel Dormouse, Cinnabar moth, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Red Kite, Bullfinch, Linnet, Song Thrush, Turtle Dove, Yellowhammer, Helleborine, Tor-Grass, common Lizard, Slow Worm, Badger, Warblers, Fieldfare, Tawny and Little Owl, and Woodpecker, Glowworm and 11 species of bat are also present. It harbours a sense of 'wildness' not experienced anywhere else in Winchester. Whilst places like st catherines hill may host some of these species, the quieter (less touristy), more secluded setting of Bushfield camp allows the local community to experience calm and the sounds of nature, being closer to these rare species. This site can no longer be considered previously developed land and as such, having in mind its location in the countryside and within a settlement gap, should not be allocated for development of any sort. In 2013 the site was allocated in the extant Local Plan and referred to as a 'partly brownfield site' in the inspector's report. Eleven years later the site has been untouched, returned to its natural state with flourishing biodiversity respected and appreciated by residents.</p> <p>The allocation of Bushfield Camp at Policy W5 of the Reg 19 Plan is unsound because it is not justified as it conflicts with the following policies in the Reg 19 Plan: NE1 Protecting and enhancing Biodiversity and the Natural Environment</p>

NE5 Biodiversity  
NE15 Special Trees, Important Hedgerows and Ancient Woodlands  
NE17 Rivers and their Settings

It conflicts with the following paragraphs of the NPPF: NPPF paragraphs 180,185, 186, 187, 188, 189-194 (ground conditions and pollution). And it is not consistent with findings in the Habitats Regulation Assessment that has been carried out to support the as yet undecided planning application on this site. To overcome this failure and to ensure that the Plan is sound the allocation W5 should be removed from the plan.

Since WW2, the UK has lost 80% of it's chalk downland to farming, largely due to the deeply concerning fact that planning regulations do not apply to agricultural land which makes up 70% of the UK. Bushfield Camp is chalk downland, which Winchester City Council should be seeking to preserve. The allocation site is also a key link in the Nature Recovery Network as it provides connections between the surrounding landscape and other designated sites. Any large-scale development on this site will undoubtedly put pressure on other nearby designated sites including the River Itchen Site of Importance Scientific Interest (SSSI) and Special Area for Conservation (SAC), and St Catherines Hill SSSI. The proposed allocation will damage the conservation status of Annex 1 listed birds under the Birds Directive (Nightjar and Woodlark). Developments must result in a minimum of 10% biodiversity net gain, but this will be impossible to achieve if there is a loss to chalk grassland and it's associated species, not forgetting how any noise disturbance associated with traffic, building, footfall will lose all the rare birds previously listed.

The proposal to build on Bushfield Camp is entirely contradictory to the Reg 19 plan aiming to play a key role in moving the district towards Carbon Neutrality by 2030 and support the City Council's strategy to avoid a Nature Emergency by creating a 'greener district'. This commitment is embodied in paragraph 7.14 of the plan, referring to the Environment Act 2021, which emphasises the importance of nature in the drive to tackle climate change. It sets clear statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water and waste. It includes an important new target to reverse the decline in species abundance by the end of 2030. Winchester City Council's principal ecologist states that 'at present there are still a number of concerns which need to be addressed to show whether significant harm to biodiversity can be adequately mitigated and compensated for in accordance with (existing local plan) LPP1 Policy CP16. We contend that such an important site with potential for impact on the River Itchen SAC should not be put at risk in this way and is contrary to the draft local plan policy NE1 and NPPF policies P180, P185, P186, P187. Many of the affected wildlife species will not be able to return if disturbed as their numbers are so dramatically low nationwide as it is. Soundness failure: Policy W5 is not justified as it renders the Reg 19 Plan internally inconsistent. It conflicts with Policies NE1 and NE5 of the Plan. It is inconsistent with the supporting text in paragraphs 7.14, 7.41 and 12.56 of the Plan and it conflicts with national policies set out in paragraphs 180, 185, 186 and 187 of the NPPF.

	<p>There is a significant hedgerow and woodland habitat at Bushfield Camp that is home to a wide range of birds. The development proposed in the application 23/02507/OUT would include the felling of trees contravening current local plan policy DM24. Many of these trees are in public view and provide an essential habitat. Policy W5 is not justified as it is inconsistent with policies NE15 and NE17 of the plan. It fails to provide robust criteria to ensure that the existing hedgerow and woodland habitat is protected by any future development. It fails to satisfactorily address the risk posed to the River Itchen SAC.</p> <p>Policy W5 is unsound. It is not effective because it does not provide clear requirements to ensure that development would be consistent with the Council's Carbon Neutrality Action Plan's target of net zero greenhouse gas emissions by 2030. It would conflict with Policy CN1 of the Reg19 Plan and with national policy in paragraph 11a and para 159 (previously 158) of the NPPF.</p> <p>This allocation is not consistent with national policy, notably paragraph 108 (was 110) (b) of the NPPF, as there is no evidence that it has been prepared with the active involvement of the highways authority or neighbouring council/s. Sections iv and v of Policy W5 are so vague that they risk transport emissions that would undermine the Council's Carbon Neutrality Action Plan's target of net greenhouse gas emissions by 2030. To achieve net zero emissions by 2030 in the district there will have to be cumulative reductions of 67 KtCO<sub>2</sub>e in transport emissions each year until 2030. There is clearly no headroom in overall transport emissions to accommodate an increase in transport emissions that this allocation would generate, as illustrated by the outline planning application. This would make a sharp reduction necessary across the district even more unachievable. So far, neither National Highways nor Hampshire County Council have agreed to the development proposed in the outline planning application, which we contend demonstrates the level of development which Policy W5 would facilitate.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Remedy: Policy W5 should be removed as an allocated site.</p> <p>The need for mixed use development as set out in the policy is not supported by clear evidence. There is insufficient local economic need for the development proposed in both qualitative and quantitative terms to override the objections that the location is unsustainable and the environmental impact of development so harmful. Furthermore, there is nothing in the Council's evidence base to demonstrate a need for an innovation/ employment hub and creative industries. Policy W5 fails to demonstrate that the uses on the site would not compete, detract or undermine Winchester Town Centre.</p> <p>Following the pandemic and the trend for working from home, the use of land in sustainable locations in Winchester town centre for employment and regeneration, such as the allocations in policies W8 Station Approach and W7 Central Area, should be developed first, before any consideration is given to developing sites for employment outside Winchester Town Centre.</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>	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>	W5
<b>Name of respondent (or client)</b>	Liz Kessler
<b>Personal reference number</b>	BHLF-AQTS-32YQ-8
<b>Full reference number</b>	BHLF-AQTS-32YQ-8/5/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Strategic Policy W5 Bushfield Camp This Policy should be removed from the Local Plan. Bushfield is separate form Winchester town, a site that was used temporarily during the war and afterwards by the army; it has reverted to nature and forms part of Winchester's unique setting. This policy is unsound on matters of biodiversity and water issues, landscape impact, its allocated use and transport issues. This is well explained in the response from the Save Bushfield Campaign so I shall not repeat them here.
<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>	W5
<b>Name of respondent (or client)</b>	Lois Gravely
<b>Personal reference number</b>	ANON-AQTS-3BR1-H
<b>Full reference number</b>	ANON-AQTS-3BR1-H/6/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	As you say this is a sensitive site. The proposed development currently put forward by the developers is oversized and will be very damaging in terms of noise and light pollution. You will be aware that there have been over 800 objections by local people. The features of peace and tranquility which set this place apart will be destroyed. It will cause the over development and urbanisation of the South Winchester area and will place an intolerable strain on the local transport network.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Stringent protection needs to be put in place for this site for the benefit of Winchester, it's people, biodiversity and its future. The current development proposals are not needed and bring no benefit to the people of Winchester.
<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>	No

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

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/10/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Proposed regeneration at Bushfield Camp, if successful, would fail to safeguard Bushfield Camp SINC, with losses to priority habitats and species, the fragmentation of the Nature Recovery Network and unmitigated recreational impacts on the Itchen SSSI and St Catherine's Hill SSSI. While we welcome the inclusion of policies to support a Habitats Regulations Assessment, to consider the potential effects on biodiversity both on-site and on the River Itchen – this policy must go further in its protection of existing on-site flora and fauna. Over the past half-century, Bushfield Camp has naturally rewilded from a brownfield site into a haven for diverse flora and fauna, including Cinnabar moth, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Linnet, and Red Kite, Bullfinch, Linnet, Song Thrush, Turtle Dove, Yellowhammer, among many others. Bushfield camp is fortunate to have some of Winchester's last remaining relic chalk grassland, a priority habitat which can hold immense biodiversity value but is disappearing fast both locally and nationally. It also holds other priority habitats including Lowland Meadows and Lowland Mixed Deciduous Woodland, serving as a key link in the Nature Recovery Network, fostering connectivity within the broader landscape and the nearby designated sites.</p> <p>This policy does not reflect the appropriate level of ambition to protect the site and surrounding protected areas. In particular, clause xv states "Where it has been demonstrated that the proposals will have a significant adverse effect on the integrity of the River Itchen SAC it must be demonstrated, as part of the design process, that adequate measures in line with Policy NE1 and Policy D7, will be put in place to avoid or mitigate any adverse effects". This section must be amended to explicitly endorse usage of the mitigation hierarchy<sup>33</sup>, to prioritise the avoidance of any adverse effects on the River Itchen SAC first and foremost. This is essential in order to comply with the River Itchen SAC Site Code, which mandates the maintenance of the structure, function and distribution of qualifying natural habitats and species<sup>34</sup>. Policy NE1 which guides mitigation strategy commits to the prevention of net loss but must be modified to commit new developments to a mandatory net gain, going beyond minimum standards to achieve 15% or 20% net gain.</p> <p>We welcome Policy D7: Development Standards and its commitment to ensuring that proposals comply with national statutory standards relating to environmental quality. We recommend that development standards are linked to the requirements for protecting and enhancing priority species as per the forthcoming LNRS.</p>

	<p>The recent nature emergency declaration by Winchester City Council in September 2023 underscores the urgent need for nature’s recovery locally, nationally and globally. Bushfield Camp, as a designated Site of Importance for Nature Conservation (SINC) and a crucial component of the Nature Recovery Network, occupies a central role in realizing these objectives. The proposed development, with its potential loss of the SINC habitat and adverse impacts on the Nature Recovery Network, stands in direct contrast to the council's nature emergency declaration. These sites are designated locally for a reason: they are important for wildlife and must be protected.</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)</a></p>

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Lorraine Robinson
<b>Personal reference number</b>	BHLF-AQTS-32Y1-8
<b>Full reference number</b>	BHLF-AQTS-32Y1-8/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>I object to the proposals outlined for Bushfield Camp. The highway is congested to unacceptable levels already. There is no demand for the proposed multi use of Bushfield (for example existing office blocks are unsold in and around Winchester and HCC plan to sell off more).</p> <p>The plans show decimation of natural habitats replaced by manicured walkways which will ruin the eco balance. This is a dreadful idea to build car park, housing, offices.</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 may contain additional details,</i>	No

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



<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Lucy Hall
<b>Personal reference number</b>	ANON-AQTS-32MK-P
<b>Full reference number</b>	ANON-AQTS-32MK-P/1/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Building on green field land goes against Winchester councils policies to tackle the climate crisis and protect wildlife. Bushfield camp, having been left to it's own devices, has seen wildlife return to the area and thrive. Winchester council should be protecting this area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The land west of Courtenay Road should be taken out of housing allocation, and protected as open space to deliver ecological benefit and/or meet current and forecast community open space need. This aligns with national policy on need for more protected land, which (as a proportion of England's land area) has fallen in the past year from 3.11% to 2.93% in the past year alone. Reporting (03 Oct 24) available here: <a href="https://www.theguardian.com/environment/2024/oct/03/nature-england-under-threat-protected-land-falls-data">https://www.theguardian.com/environment/2024/oct/03/nature-england-under-threat-protected-land-falls-data</a>
<b>What is your suggested wording or text for the policy?</b>	The land west of Courtenay Road should be included within policy NE10 – Protecting Open Areas. These are open areas within defined settlement boundaries which have an important amenity, biodiversity, heritage or recreational value which are given protection from 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>	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>	W5
<b>Name of respondent (or client)</b>	Lynda Fletcher
<b>Personal reference number</b>	BHLF-AQTS-32E9-V
<b>Full reference number</b>	BHLF-AQTS-32E9-V/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	I object to the Bushfield Camp application which conflicts with adopted plan WT3. My objection is with respect to the issues listed above and W5 policy. I agree with and support all the details and arguments made in the joint response by Badger Farm and Olivers Battery Parish Councils and residents association, Compton and Shawford, Otterbourne and Twyford parish Councils and others.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The modifications made in the response (joint by the organisations listed in the box above which included the City of Winchester trust, Winchester Action on the climate crisis, extinction rebellion, Winchester councillors Sue Cook, Brian Iaming and Jan Warwick
<b>What is your suggested wording or text for the policy?</b>	The same as that suggested by the organisations listed in the two boxes above in their joint response
<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>	W5
<b>Name of respondent (or client)</b>	Martin Jones
<b>Personal reference number</b>	ANON-AQTS-32MB-D
<b>Full reference number</b>	ANON-AQTS-32MB-D/1/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Although the current proposal for development of the land previously known as Bushfield Camp is sound and highlights the factors to take into consideration, I do not support the proposal to develop industrial units on this site. In light of the NHS proposal to close services at the Royal Hampshire County Hospital, I believe that the Bushfield site would be perfect for a new hospital to cater for the massive increase in development in the surrounding area and the many additional families this would bring. Its proximity to the M3 would be far more beneficial to the people in the area as a new hospital site than an industrial site would be.</p> <p>I hope that you can find the enthusiasm necessary to move this proposal forward and discuss with the necessary bodies dealing with hospitals.</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.</i>	No

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<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Mary Parker
<b>Personal reference number</b>	ANON-AQTS-3BBF-P
<b>Full reference number</b>	ANON-AQTS-3BBF-P/1/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I agree with all the points made in the submission from the Save Bushfield Campaign. For all the reasons stated there, and in all its aspects, It starts from a factually incorrect statement of the position. Policy W5 conflicts with other Plan policies and with several requirements in the National Planning Policy Framework – including policies on biodiversity and the environment, landscape impact, questions of need and use, and on transport. In all these respects, Policy W5 not only contradicts the other policies but would do irremediable harm to Winchester and its residents. It seems to have been drafted to fit with a proposed outline planning application, which is astonishing and surely the wrong way round. Any development on the site conflicts with so many of these policies, and the site should not be allocated for development of any sort.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy W5 is unsound and conflicts with other policies in the Plan and it should be deleted. Any development on the site conflicts with so many of the policies in the Plan and in the NPPF, and the site should not be allocated for development of any sort.
<b>What is your suggested wording or text for the policy?</b>	In order to avoid conflicts with the policies on biodiversity and the environment, landscape, impact, need and transport, Policy W5 should be deleted and no development of any type should be allowed on the 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>	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.</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>	W5
<b>Name of respondent (or client)</b>	Michael Davies
<b>Personal reference number</b>	ANON-AQTS-32MA-C
<b>Full reference number</b>	ANON-AQTS-32MA-C/1/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>It would seem that the developers, Gisborne, were unaware of the Solent Free Port development, just down the M3, which has the backing of the Solent Port Authority and the owners of Southampton Airport, when they submitted their development plan.</p> <p>As part of the Solent Free Port development, Navigator Quarter is being developed next to Southampton Airport. It is a 112 acre (just under 453 thousand square meters and just under 4.8 million square feet) tax efficient site which offers business tax rates relief and other incentives to support capital investment, skills and employment. It consists of a Science Park which is an extension of the University of Southampton Science Park, an established innovation hub with decades of experience and industry connections. This park is divided into a Tech Box with office, research and light industrial manufacturing &amp; assembly and an Industrial Area with highly flexible warehouse spaces. All have good transport links to the M27, M3, Southampton Parkway railway station, Southampton airport, Southampton marine port and there is the possibility of a direct bridge to link the site with the M27. It will provide a campus atmosphere with links to 3 universities and extensive leisure and recreation facilities nearby. Southampton airport has already expanded, with a runway extension, making it able to offer more connection opportunities to Europe. There is also due to be a £100 Million investment in the local road infrastructure. Overall, it will build on Southampton University's existing Science Park expertise in the high tech bio and med-tech sectors.</p> <p>At a packed public meeting at Badger Farm Community Centre last summer, attended by the developers, Gisborne and investors, Legal &amp; General, they admitted that they were not even aware of the Free Port and that, at that point, they had had no expressions of interest from any companies or UK universities. Surely no company or university is going to want to move to Bushfield when they can move into a thriving, talent rich and tax efficient site a few miles down the road? This is especially true considering that the tax breaks only extend as far north as Eastleigh, leaving Bushfield well outside the business tax haven. In short, Navigator Quarter makes of mockery of the current Bushfield plans and turns the whole project into an environmentally destructive white elephant which will have to pitch itself against a bespoke development</p>

	which offers all that Bushfield can but also so much more and has the might of governmental policy, tax benefits and funding behind it.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Local residents are not against any development at Bushfield but it has to be on a reasonable scale, certainly not the 1 million square feet currently being proposed. It should also be built on the old parade square and footprint of the surrounding buildings thus preserving the nature rich and wildly bio-diverse land nearby which is currently home to protected species of flora and fauna. Winchester City Council has rightly declared a climate emergency but it is the mass destruction of established and species diverse green land such as that at Bushfield, that is in part, responsible for our worldwide temperatures rising at such unsustainable and destructive rates, as we are seeing year on year. Navigator Quarter will be built on the brownfield land of the former Eastleigh railway marshalling yards and not a lush green space that was incorrectly classified as brownfield when it passed from the MoD estate to the Church Commissioners 45 years ago. Normal protocol is for MoD land that was requisitioned from Agricultural land to be reclassified as the same when it is released from Crown Service. This misguided plan is just being designed to line the pockets of the Church Commissioners and has been exposed here as a folly.
<b>What is your suggested wording or text for the policy?</b>	I have no suggested wording or text but would like to recommend and also plead that Bushfield Camp should be retained primarily as a green space for nature to continue to thrive and for the residents of Winchester and surrounding areas to enjoy.
<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>	W5
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/27/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	no comments
<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)</a>

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Mrs J Ayre, Parish Clerk
<b>Personal reference number</b>	BHLF-AQTS-32E8-U - Otterbourne Parish Council
<b>Full reference number</b>	BHLF-AQTS-32E8-U - Otterbourne Parish Council/1/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	W5 is unsound. The proposed development will result in significant increased vehicle movements through our village that contravene Policy T1 of the Reg 19 Plan. It also fails to support WCC Carbon Neutrality Action Plan's target of net zero greenhouse gas emissions by 2030. It would therefore conflict with Policy CN1 of the Reg 19 Plan and with national policy in paragraph 11a and para 159 (previously 158) of the NPPF. We believe the W5 Policy as stated fails in the duty to cooperate. The transport assessment and resulting sustainability impact have not been updated since the outline planning application stage. There appears to be no evidence of the active involvement of the Highways Authority since that time. It is therefore difficult to comment as effectively as we feel is necessary at this late and important stage in the Local Plan development process.
<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</i>	Yes <a href="#">Form (commenting on policies)</a> <a href="#">Letter (commenting on policies)</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>	W5
<b>Name of respondent (or client)</b>	Peter Reeves
<b>Personal reference number</b>	ANON-AQTS-32K9-2
<b>Full reference number</b>	ANON-AQTS-32K9-2/2/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The proposed policy W5 by apparently allocating use to “flexible business and employment space, education hub, and creative industries...”, may inadvertently attract existing or prospective business from elsewhere in the City, not least existing business units in Winnall, contrary to the assumption at W5, sub para (iv). Winnall for example in Sub Area 2 has seen household named businesses vacate units without it appears replacement.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Is the allocated use to narrowly drawn.
<b>What is your suggested wording or text for the policy?</b>	Caveat the “Allocated use” section for this Employment Allocation by inserting/using the phrasing at W5, (iii), “should identify the rationale /mix of uses taking into account and use of land previously occupied by the former army base”, existing text to follow.
<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>	W5
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/15/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Section (v) and (vi) are inadequate. Neither the Winchester District LCWIP nor the Winchester Movement Strategy have mentioned Bushfield Camp, so the reference in (v) is of no value.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Add specification for the standards to which the facilities for sustainable modes of travel will be built to maximise the use of walking, cycling and public transport. For example: what frequency of buses? What surfacing for walking and cycling paths? What lighting? What access to the walking and cycling routes from the centre of Winchester town?
<b>What is your suggested wording or text for the policy?</b>	new sub-policy v v. The proposals will create a permeable place putting people and places at the forefront, with infrastructure for sustainable modes of travel that maximise walking, cycling and public transport to reflect the Winchester Movement Strategy and LCWIP and to ensure that the development plays a proportionate role in reducing transport emissions to enable Winchester District to achieve overall zero net emissions by 2030. There should be 5 route miles each of cycling and walking network on a site of this size. These sustainable modes of travel should connect to the surrounding area/PROW/ cycle network, landscape and designated heritage assets and links to the Winchester train station, the city centre, Badger Farm shopping centre, bus stops on routes 1, 2, P&R, 61, 69, and the existing nearby park and ride facility;
<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>	W5
<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/76/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W5
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/31/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>We welcome the inclusion of the criterion below for the following policies W5 Bushfield: Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p> <p>Supporting Text: This is because our initial assessment of the site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>New recommendation: Southern Water is the statutory water and wastewater undertaker for the Winchester Town area. In accordance with this, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet a possible forecast demand for this proposal, based on a calculated flow rate. The assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development of the site. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.</p> <p>Proposals for this site could generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement would be provided through the New Infrastructure charge, but Southern Water would need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless any requisite works are implemented in advance of occupation.</p>

	<p>Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023). Accordingly, we propose the following additional criterion for Policy W5: Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>We propose the following additional criterion for Policy W5: Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</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="#">Supporting Document (Commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Save Bushfield Campaign
<b>Personal reference number</b>	ANON-AQTS-327A-P
<b>Full reference number</b>	ANON-AQTS-327A-P/1/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Excerpt from letter (too large to include full representation here): 2 OVERALL FAILURE OF SOUNDNESS TESTS AND CONFLICT WITH NATIONAL POLICY W5 is not justified. It fails the soundness tests on several counts and conflicts with other policies in the Regulation 19 Plan. The Sustainability Appraisal does not support the allocation. The allocation is not sound as it conflicts with other policies in the Reg19 Plan and with government policy in the NPPF. It is situated in open countryside and in the Winchester – Compton Street settlement gap as set out in Policy NE7 of the Regulation 19 Plan. Policy NE7 states, with regard to settlement gaps: Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence. Later in this representation we explain how the allocation conflicts with other policies relating to biodiversity and the water environment (section 3) and impact on the landscape (section 4). We then explain, in section 5, that there is no justification for the allocation as there is no evidence to demonstrate the need for mixed use development on the site. Finally, section 6 sets out the transport and travel issues that make the allocation unsustainable and unlikely to be delivered.</p> <p>The site was originally allocated for employment development in the Winchester District Local Plan Part I, which was adopted in 2013. Over the 11 years since the allocation was made there has been no attempt to develop the site. This suggests that when this allocation was made it was in fact not “effective” ie that it was not deliverable over the plan period. We will argue later in this submission (section 5) that the current allocation, Policy W5, also fails the soundness test (effective) because there is no evidence to demonstrate that it can be delivered during the plan period. The allocation fails to take account of the potential environmental, economic and social impacts of the allocation, as identified through Sustainability Appraisal. Sustainability Appraisal of the site is contained within the Integrated Impact Assessment -IIA at Appendix F, pages 1210-12 (Sire CS15). It only scores the site as positive on economy. In contrast it scores low on other measures including biodiversity: significant negative, landscape: negligible uncertain and travel &amp; air quality: minor negative. Policy W5 does not reflect the Reg19 Plan’s sustainability objectives and</p>

	<p>there is no evidence that, should there be a need for the proposed employment space (which we do not accept), reasonable alternatives have been considered. The site is not previously developed land</p> <p>2.6 Notwithstanding the landowner's failure to develop the site, it has changed significantly in character since 2013. We will describe in sections 3, 4 and 5 of this submission that it has and continues to be (is now) an open part of the landscape which is rural in character and rich in biodiversity. The NPPF defines previously developed land as "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape." The structures on the site are remains of the camp which have existed as remains since the mid 1970's, nearly 50 years. The remains of the derelict structures on the site have existed as remains since the 1970's. Since the site was originally allocated in 2011, they have deteriorated further and have without doubt blended into their natural surroundings, so that they are now barely visible in the landscape. On this basis we argue that this site can no longer be considered previously developed land and as such, having in mind its location in the countryside and within a settlement gap, should not be allocated for development of any sort</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Allocation needs to be removed</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</i></p>	<p>Yes  <a href="#">Form (Copy of form - refers to letter)</a>  <a href="#">Letter (Commenting on W5)</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>	W5
<b>Name of respondent (or client)</b>	Siobhan Osborne
<b>Personal reference number</b>	BHLF-AQTS-32ET-Q
<b>Full reference number</b>	BHLF-AQTS-32ET-Q/1/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>I consider the policy to be unsound as follows: The policy does not recognise the allocations' Site of Importance to Nature Conservation (SINC) status &amp; therefore offers no protection to this important habitat. In doing so there is a risk of not achieving the statutory BNG requirement of the Environment Act 2021 &amp; serious conflict with policies NE1 &amp; NE5. Paragraph 7.14 of the Local Plan states 'Wildlife sites and habitats within this area and across the district that are of regional and local importance include 17 SSSIs, almost 600 Sites of Nature Conservation (SINCs) and 9 Local Nature Reserves (LNRs). These sites support important natural assets, such as ancient woodlands, grasslands and chalk rivers. These sites will be protected, with opportunities for enhancement encouraged.'</p> <p>Within other allocations of the Local Plan, such as BW1 Tangier Lane &amp; W2 St John Moore Barracks, the SINCs present are specifically referenced within the allocation policy. Why not for W5 and are there other allocations with SINC, or indeed other designated status where this has also been omitted? With this lack of recognition of Bushfield's SINC status &amp; in the absence of evidence that the site has been recently assessed (as previously developed land/partial brownfield) for its suitability (&amp; not other alternative sites) to be developed as outlined in W5, I consider it to be unsound &amp; not justified. My understanding is that registered 'brownfield' sites should be routinely assessed to ensure that status still applies - Bushfield has been laying fallow for longer than it was ever in use for human activity as a military training camp &amp; the site has blended back into the landscape.</p> <p>This allocation is currently subject to an undetermined planning application. This planning application was informed by a Concept Masterplan heavily referencing policy W5 of this draft Local Plan, which was approved by Cabinet in June 2023. At this meeting concerns were raised with Cabinet of this allocation, and over the consultation exercise undertaken by developers to inform the approved Concept Masterplan. The consultation drew criticisms of: key aspects of proposals presented to consultees/residents unclear or absent, cherry-picking of stakeholders feedback &amp; no meaningful consultation at all with others prior to the Masterplan completion. In approving the Concept Masterplan in June 2023 has WCC not already pre-determined W5 of this draft Local Plan? Was this not premature in light of this consultation the public are now</p>

	again being asked to contribute to. On this basis, I believe policy W5 to be unsound in terms of the tests - Positively Prepared & Justified.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	For allocation W5 Bushfield Camp to be removed. For all allocations where any of the 17 SSSIs, almost 600 Sites of Nature Conservation (SINCs) and 9 Local Nature Reserves (LNRs), or any other designated site, is present, to be consistently identified & protection safeguarded within each allocation.
<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 policies)</a>

<b>Policy/Evidence base document</b>	W5
<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)/13/W5
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The site is in the setting of the South Downs National Park and is an existing strategic allocation in the Winchester Local Plan Part 1 (Joint Core Strategy), under Policy WT3. The principle of development has been established and Policy W5 proposes to carry forward the allocation into the Winchester Local Plan 2040. In comparing the policy wording and supporting text of the adopted and proposed policies, the policy has been updated and strengthened. In terms of the final master-planning and detailed matters of development, this will be addressed through the planning application process. As part of this, the SDNPA is committed to working with WCC to bring this strategic site forward in a way which avoids or minimises any potential adverse impacts of the South Downs National Park as per NPPF Paragraph 182.</p> <p>We request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5 as this will assist applicants and case officers in understanding the relationship of the site within the setting of the South Downs National Park.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The site is in the setting of the South Downs National Park and is an existing strategic allocation in the Winchester Local Plan Part 1 (Joint Core Strategy), under Policy WT3. The principle of development has been established and Policy W5 proposes to carry forward the allocation into the Winchester Local Plan 2040. In comparing the policy wording and supporting text of the adopted and proposed policies, the policy has been updated and strengthened. In terms of the final master-planning and detailed matters of development, this will be addressed through the planning application process. As part of this, the SDNPA is committed to working with WCC to bring this strategic site forward in a way which avoids or minimises any potential adverse impacts of the South Downs National Park as per NPPF Paragraph 182.</p> <p>We request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5 as this will assist applicants and case officers in understanding the relationship of the site within the setting of the South Downs National Park.</p>
<b>What is your suggested wording or text for the policy?</b>	We request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5 as this will assist applicants and case officers in understanding the relationship of the site within the setting of the South Downs National Park.
<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="#">Email (Commenting on NE8)</a> <a href="#">Letter (Commenting on policies)</a> <a href="#">Email correspondence (Re policy NE8)</a>

<b>Policy/Evidence base document</b>	W5
<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/6/W5
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>This is a site carried forward from the existing plan, for employment purposes. We raise significant objection to this allocation. As the plan makes clear at various points, this is a highly sensitive site in relation to topography, flood risk, landscape/coalescence. Master planning has not been undertaken, and it is not clear the extent to which the significant and wide-ranging constraints can be addressed. Until a full assessment is undertaken, this site should not be included within the plan.</p> <p>In any event, because the site is being rolled forward from the existing plan, significant question marks remain as to its suitability and deliverability. The plan does not explain why the site is now likely to come forward. Absent of this justification, the site should be removed from the plan.</p> <p>We recognise that the delivery of employment land is a key objective and requirement of the plan, however deleting this site need not prejudice the realisation of these objectives given our representations in relation to Policy W2 (Sir John Moore Barracks) which we consider would more appropriately be put to employment led development at the point at which it is known when the site is available.</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="#">Letter (commenting on policies)</a></p>
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<b>Policy/Evidence base document</b>	W5
<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-4/5/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Full response on website The Trust is a party to a combined objection to this policy by 11 organisations submitted separately from this submission
<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 - response detailed in letter)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W5
<b>Name of respondent (or client)</b>	Three Maid LLP
<b>Personal reference number</b>	ANON-AQTS-32F2-P
<b>Full reference number</b>	ANON-AQTS-32F2-P/5/W5
<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 W5 of the proposed submission Local Plan identifies Bushfield Camp for 20 hectares of employment provision, specifically for ‘high quality flexible business and employment space, an innovation hub and creative industries’ Bushfield Camp is a long-standing allocation that was originally identified for development potential within the 1997 Bushfield Camp Study and subsequently allocated for employment within the adopted Core Strategy 2013 (Policy WT3). The allocation recognised the landscape sensitivity of the site adjacent to the Local Gap, South Downs National Park and River Itchen SSSI, and the need to contain development that the previously developed land area only. Despite the allocation being made over 10 years ago, there has been no movement on the site until an outline planning application was submitted in October 2023. The application is for a knowledge quarter comprising 96,500 sqm (less than 10 ha) comprising flexible uses within Use Classes E and F, it does not include any form of B2 and B8 uses. The application does not accord with the allocation within the proposed submission local plan. We would argue that this does not meet the requirements of the Framework at paragraph 126 which states that:</p> <p>“126. Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p> <p>a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</p> <p>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”</p> <p>The Local Plan should be updated to reflect the actual uses coming forward through the outline planning permission, with the shortfall this creates in B2/B8 development within the plan re-allocated elsewhere. We are also concerned with the narrow focus of the employment type for this location, particularly with the difficulties abounding in the tertiary education market.</p>
<b>What modification(s) are necessary to make the</b>	

<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>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>	W5
<b>Name of respondent (or client)</b>	Mrs. Christine Howe, Clerk/Responsible Finance Officer to Badger Farm Parish Council
<b>Personal reference number</b>	ANON-AQTS-32N8-4 - Badger Farm Parish Council
<b>Full reference number</b>	ANON-AQTS-32N8-4 - Badger Farm Parish Council/2/W5
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The Parish Council consider the Plan unsound for the reasons set out below.</p> <p>The allocation of Bushfield Camp is a carry-forward of Policy WT3 of the Winchester District Local Plan Part 1: Joint Core Strategy which was adopted in 2013. National Planning Policy, as set out within the December 2023 National Planning Policy Framework (NPPF), requires that local planning authorities should “take into account changing circumstances affecting the area, or any relevant changes in national policy” (para 33) when reviewing local plan policies. This includes the requirement to consider any relevant legislative changes. The existing (but out-of-date) policy WT3 recognised the likely impact of development of the site on the character and setting of the nearby South Downs National Park and required that this be mitigated by means of “exemplary design and configuration so as to have an acceptable impact on the setting of Winchester, the South Downs National Park and the wider area, retain key views, and take into account its unique gateway location and the various designations that affect the site and its surroundings”.</p> <p>Sub-paragraph (x) of Policy W5, to a limited extent, seeks to replicate the requirements of the previous policy. The requirement for “exemplary design and configuration so as to have an acceptable impact...” has been reduced to merely “have particular regard to the relationship with...”, weakening rather than strengthening the requirement to avoid or mitigate adverse impacts on the National Park.</p> <p>In their response to Regulation 18 consultation representations on this point, including that submitted by the South Downs National Park Authority, the Council states, “It is important that the Local Plan is read as a whole and in this respect” and refers to proposed policy NE8.Policy W5 – Bushfield Camp (Adverse impact on Character and Setting of the South Downs National Park Bushfield Camp is not a ‘brownfield site’ as incorrectly described within some supporting documentation and, it is understood, by the 2013 Local Plan Inspector in his report. It is welcomed that this is acknowledged by the Council in their Regulation 18 consultation response to Cllr Laming which states “The policy and supporting text has not stated that it is brownfield land”. It is also noted that, as contended by the site promoter (Lichfields on behalf of the Church Commissioners for England and others), the Council acknowledged that “development of the scale at Bushfield Camp cannot be fully screened and may be visible in key views”.</p>

	<p>St. Catherine’s Hill, situated to the West of the site and from which any development of Bushfield Camp will feature prominently, is a Scheduled Monument (St Catherine’s Hill hillfort, List Entry 1016489), Site of Special Scientific Interest, and a prominent feature within the South Downs National Park. St Catherine’s Hill is Open Access Land under the Countryside and Rights of Way Act 2000 and therefore any adverse impact on views from the St Catherine’s Hill will impact on the public’s enjoyment of the National Park. The NPPF states “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks ... which have the highest status of protection in relation to these issues” and that “development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas” (para 182). Additionally, the Council is required to “further the purposes” of the South Downs National Park, specifically in “conserving and enhancing the natural beauty, wildlife and cultural heritage” (Part 2, Section 5(1), National Parks and Access to the Countryside Act 1949).</p> <p>In carrying forward the allocation of Bushfield Camp from the 2013 Local Plan the Council has failed to have appropriate regard of the changes to National Planning Policy as set out within the National Planning Policy. The 2012 National Planning Policy Framework, with which the 2013 Local Plan was required to be in conformity, while requiring that, “Great weight should be given to conserving landscape and scenic beauty in National Parks” (NPPF 2012, para 115), did not stipulate the requirement that development within their setting should avoid or minimise adverse impacts on the National Park. Furthermore, at the time of the examination and adoption of the 2013 Local Plan, and at the drafting and Regulation 18 consultation on the current plan, the Council’s statutory requirement was to “have regard to” rather than the now “further” the purposes of the National Park. Badger Farm Parish Council consider Policy W5 to be unsound as the proposed policy is contrary to National Planning Policy as set out within paragraph 182 of the National Planning Policy Framework 2023. Furthermore, that the Council in seeking to allocate the site for development is acting contrary, and therefore unlawfully, to the requirement of the National Parks and Access to the Countryside Act 1949 that it further the purposes of the National Park by conserving and enhancing its natural beauty. The Council does not consider that Policy W5 can be made sound, and therefore that only by the deletion of the proposed policy can the proposed plan be made sound.</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="#">Form (copy of form - response detailed in letter)</a> <a href="#">Letter (commenting on policies)</a>

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) from Natural England regarding paragraph 12.52.

[Proposed Modifications](#) from Historic England regarding criterion xii in Policy W5.

[Proposed Modifications](#) from Southern Water regrading criterion xix.

[Proposed Modification to Local Plan policies map](#) is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps

<b>Local Plan Reference or document</b>	Policy W6 Winnall	
<b>Total Number of Representations received.</b>	9	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	8	1
<b>Sound</b>	1	8
<b>Complies with Duty to Cooperate</b>	7	2
<p><b>Summary of Representations</b></p> <p>The respondents comments centre around the policy’s lack of flexibility to support a diverse range of employment uses, particularly in terms of retail and leisure sectors and the alignment of the policy with national policies and local employment needs. These concerns relate to the need to widen the policy wording to a broader range of employment-generating activities beyond traditional industrial uses to better reflect the diverse economic base (to allow out of town developments).</p> <p>Concerns expressed on the effectiveness of being able to accommodate modern employment generating development in outdated buildings. There were concerns about infrastructure and environmental issues and a point from Southern Water about the need to align any future growth of this industrial estate with the capacity of the sewerage infrastructure.</p> <p>Connectivity and accessibility of the industrial estate were highlighted as areas that needed enhancement in terms of the need to improve pedestrian, cycle, along with public transport links.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/5/W6</p> <p>ANON-AQTS-3BPH-6/1/W6</p> <p><b>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/2/W6</b></p> <p>ANON-AQTS-3299-G/2/W6</p> <p>ANON-AQTS-3298-F/1/W6</p> <p>ANON-AQTS-3BBW-7/1/W6</p> <p><b>ANON-AQTS-327U-A - Southern Water/4/W6</b></p> <p>ANON-AQTS-32F2-P/1/W6</p> <p>ANON-AQTS-3B8M-K/1/W6</p>		
<p><b>Main issues raised in representations received in regulation 19 consultation.</b></p> <ul style="list-style-type: none"> <li>• The need for flexibility in order to support a diverse range of employment uses, particularly in terms of retail and leisure sectors beyond traditional industrial uses in order to better reflect the diverse economic base;</li> <li>• The need to align any future growth of this industrial estate with the capacity of the sewerage infrastructure; and</li> </ul>		

- Connectivity and accessibility were highlighted as areas needing enhancement in terms of the need to improve pedestrian, cycle, and public transport links.

<b>Policy/Evidence base document</b>	W6
<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/2/W6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.

<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>	W6
<b>Name of respondent (or client)</b>	Hargreaves Properties Ltd
<b>Personal reference number</b>	ANON-AQTS-3298-F
<b>Full reference number</b>	ANON-AQTS-3298-F/1/W6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>These representations are submitted by Hargreaves Properties Ltd (“Hargreaves”) with respect to the Winchester Proposed Submission Local Plan. Hargreaves are the owners of the Moorside Retail Park and Winchester Trade Park, which are identified on the attached plan, and as such are primarily concerned with policies contained within the ‘Creating a Vibrant Economy’ Chapter and employment allocations in Winnall. The Sites Moorside Retail Park and Winchester Trade Park adjoin one another and are separated by the Easton Road. Occupying an area of approximately 3.9ha, they operate side by side and are located to the northeast of the city, within the Winnall area. There are a variety of different businesses located with the parks, including bulky goods retailers, trader counter uses, and employment uses. These include operators such as Pets at Home, City Plumbing, Topps Tiles, Easy Bathrooms and East St Cycles. Formerly Carpetright, Halfords and Currys also operated from these sites. Two out of three of the units at Moorside are currently vacant, with two of the sixteen units at Winchester Trade Park also unlet. Currys handed back Unit 3 at Moorside in June 2023, and it has been vacant since. This unit is currently subject to a planning application for a change of use to a gym (Ref 23/02436/FUL), with marketing revealing interest from non-bulky retail operators and leisure operators only. This demonstrates operators targeting Winchester who are currently unable to find premises due to a lack of appropriate town centre availability and out of centre restrictions. Unit 1 Moorside has been recently vacated by Halfords. Units 13 and 14 at Winchester Trade Park were formally occupied by Carpetright, who have gone into administration.</p> <p>Summary of Representations</p> <p>The main thrust of our objection is that the policies within the Submission Local Plan, and particularly Policy W6 (Winnall) and Sub area 2, do not correctly reflect the diversity of current operators and should be amended accordingly. Also, whilst Strategic Policies E1, E2 and E4, and the supporting text of Policy W6, accept the need for a more flexible approach to supporting employment generating uses outside of the traditional B use classes, Policy W6.ii, does not in practice support this and should be amended to do so. In a rapidly evolving market, flexibility is essential to deliver economic growth, encourage innovation, avoid vacancy and ensure the effective use of brownfield land.</p> <p>Representation</p>

The site is within the Winnall area (Sub area 2), under Policy W6 within the Submission Local Plan. The geographic sub areas continue to apply with the boundaries carried over from the current Local Plan Part 2 for Sub area 2. As it stands, it is considered that the policy has not met the tests of soundness as required at Paragraph 25 of the National Planning Policy Framework (NPPF). Specifically, it is not positively prepared or justified and is not consistent with national policy. Paragraph 12.61 states that Winnall is an existing employment allocation but provides insufficient clarity that several retailers and trade counter users operate within this area, and that the principle of retail is established. Paragraph 12.67 sets out that there would be retention of B2 and B8 in the core area (Sub area 1) whilst allowing degree of flexibility elsewhere. This is supported. However, the text is confused in that it recognises the need for vitality and viability of the Winnall area but seeks to avoid out of town retail and recreational proposals. This neither recognises the current role of retailers within this designation, nor supports their job creation role and the lack of suitable sites within the town centre (confirmed by the Winchester Town Centres Study, July 2024). Within both the Moorside and Winchester Trade parks, there is a significant retail and trade counter presence and the principle of retail style development in this location has therefore been established. Sub area 2 contains Moorside Retail Park. These units operate, or previously operated, in retail use, including Halfords, Pets at Home, Currys and Costa Coffee. As noted above, two of these units are currently vacant, with a planning application for a gym use currently under consideration at Unit 3. It has established that there is no interest in the unit for bulky good operators and that these retailers are consolidating in other nearby towns with a stronger retail offer. Sub-area 2 also contains Winchester Trade Park, located to the south of Easton Lane and which comprises a variety of different trade counter and bulky good style retail uses (with half of the 16 units being in retail or trade counter use).

Notably, Strategic Policy E1 recognises the role of non-traditional employment generating activities, Strategic Policy E2 also supports more flexibility for the Winnall area, outside of Sub area 1, as does Strategic Policy E4, subject to the sequential and impact tests. However, this is not carried forward into Policy W6.ii. Adopted Policy WIN.11, expressly supports a relaxation of the protection of employment land policy and a more flexible approach. Proposed Submission Policy W6.ii, proposes to delete this text and instead inserts text supporting the presumption in favour of retention of existing B uses and creation of additional B2 and B8 floorspace. This is inconsistent with Policies E1, E2 and E4 and the policy should be amended accordingly and retain the more flexible approach of Adopted Policy WIN.11.

Whilst more traditional employment uses may take place within this area in future, it is likely that existing retail units will remain as a retail-oriented employment use. Policy W6.ii should recognise this and the role these uses can play in job creation and the local economy. Specifically, it should be acknowledged that retail, including food retail, is appropriate in this location, subject to the application of the sequential and impact tests in accordance with national policy and Submission Local Plan Strategic Policy E4.



	<p>Leisure operators are also struggling to find suitable premises in the locality, with the Council's evidence base supporting this need, and with a sizeable increase expected in leisure, competitive leisure and health and fitness (Winchester Town Centres Study, July 2024). In the same study, Winchester is shown as performing well (ranked 38 out of 1000 centres in 2024) but lacking in suitable accommodation to meet market demand. Therefore, flexibility to support increases in retail floorspace where Strategic Policy E4 is met, and to meet the needs of emerging industries, the leisure industry and sui generis type employment users should also be included. The presumption in favour of retention and creation of b uses should be deleted from W6.ii.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The policy and its supporting text should be amended to reflect the existing retail use of Winnall Sub Area-2 and the Policy changed as recommended below to be consistent with other plan policies and the supporting text of the policy.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Amend Para 12.61: The employment site located to the northeast of Winchester and comprises a large cluster of employment businesses, retailers and trade counter uses and other activities which sit adjacent to the residential neighbourhood.</p> <p>Amend Para 12.67: The employment area in Winnall is the largest employment area in Winchester Town and generally the area is thriving with very few vacant premises. The policy therefore is aimed at retaining the core of the employment area (Sub area 1) in traditional employment uses (Use Classes B2 and B8) while allowing for a degree of flexibility in those parts of the employment area where change might be expected and would support the vitality and viability of the area. It also recognises the need to maximise opportunities to create additional B2 and B8 employment floorspace within Sub area 1, improvements to community infrastructure, open space and green infrastructure provision.</p> <p>Amend Policy W6ii as follows: In sub area 2, along Easton Lane, the Council will adopt a more flexible approach in applying policy E6 and may permit employment generating uses outside of B use classes, including retail, leisure and other sui generis uses, subject to the sequential test and impact assessment, in line with Policy E4.</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)</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>	W6
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/1/W6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Sub-policy v is almost negated by the introduction that “proposals should seek to maximise opportunities” to create or improve pedestrian/cycle links. This is so tentative that even the least effectual inaction would be compliant. To be positively prepared the plan should simply require the delivery of these things. Even better it could specify the links that are needed. Similarly, a simple requirement for public transport connectivity would seem necessary, too.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	To be positively prepared the plan should require the delivery of created or improved cycling links, created or improved pedestrian links, and created or improved public transport connectivity.
<b>What is your suggested wording or text for the policy?</b>	New sub-policy v: All proposals should: v. Determine the target mode share of sustainable transport that will achieve reductions in transport emissions proportionate to the Winchester District target of net zero emissions by 2030; create or improve pedestrian/ cycle links within the site and with the surrounding area to enable safe access to facilities on the site and to adjacent residential areas, and a cycling/wheeling link to the railway station.
<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>	W6
<b>Name of respondent (or client)</b>	ReAssure Limited c/o Legal & General Real Assets
<b>Personal reference number</b>	ANON-AQTS-3BPH-6
<b>Full reference number</b>	ANON-AQTS-3BPH-6/1/W6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Consistent with our previous representations to the Regulation 18 Consultation, our client supports the general approach to employment land in Winnall and its specific allocation for employment use (page 337 in the Regulation 19 Consultation). It is however particularly important to ensure that future development of land within Winnall for appropriate employment uses, has clear support within the Local Plan.</p> <p>In this respect, and with particular focus on sub area 1, we reiterate that the references to B2 and B8 uses should be expanded to include support for Class E(g)(ii) and (iii) uses. The current proposed wording appears to have arisen following the changes to the Use Classes Order in 2020, wherein former B1 use Classes were incorporated within the new Class E (Class E(g)). However, these are still employment uses that are entirely appropriate to be undertaken in this location (in accordance with the allocation for 'employment' use), and should therefore be explicitly supported in the new Local Plan, as is the case within the current adopted Local Plan, which supports such uses (then falling within B1(b) and (c)) and which the adopted Plan considered to be traditional employment uses.</p> <p>This would ensure consistency with the definition of 'employment uses' within Policy E5 and the support for new employment opportunities at Winnall under Policy E2. It also reflects a number of existing such uses within Winnall, including sub area 1. It is therefore recommended that the policy be amended accordingly.</p> <p>As with our comments in relation to Policies E1 and E6 above, Policy W6(i) is somewhat ambiguous as it suggests that existing employment uses be retained, which could be interpreted as preventing the redevelopment of outdated employment sites / floorspace for modern employment premises. For avoidance of doubt, it is recommended that the policy be amended to state that the redevelopment of existing employment sites for employment use is supported.</p> <p>Finally, the policy adopts an inconsistent approach to the application of Policy E6. For example Policy E6 is referred in the introductory paragraph, and only afterwards in criteria W6(iv). There may be instances where individual sites within sub-area 1 are no longer appropriate or suitable for employment use, or that there is no such demand for premises in the future. As such, Policy W6 should incorporate the same flexibility for other uses to come forward where it can be demonstrated that the retention or provision of employment uses is no longer appropriate under Policy E6, in all sub-areas.</p>

	<p>We note that the Council's Consultation Comments document in relation to this Policy has not recognised or commented on the above points in relation to sub area 1, except for adding the definition of Class B2 and B8 uses. Our client therefore maintains it's position in relation to the above matters.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Consistent with our previous representations to the Regulation 18 Consultation, our client supports the general approach to employment land in Winnall and its specific allocation for employment use (page 337 in the Regulation 19 Consultation). It is however particularly important to ensure that future development of land within Winnall for appropriate employment uses, has clear support within the Local Plan.</p> <p>In this respect, and with particular focus on sub area 1, we reiterate that the references to B2 and B8 uses should be expanded to include support for Class E(g)(ii) and (iii) uses. The current proposed wording appears to have arisen following the changes to the Use Classes Order in 2020, wherein former B1 use Classes were incorporated within the new Class E (Class E(g)). However, these are still employment uses that are entirely appropriate to be undertaken in this location (in accordance with the allocation for 'employment' use), and should therefore be explicitly supported in the new Local Plan, as is the case within the current adopted Local Plan, which supports such uses (then falling within B1(b) and (c)) and which the adopted Plan considered to be traditional employment uses.</p> <p>This would ensure consistency with the definition of 'employment uses' within Policy E5 and the support for new employment opportunities at Winnall under Policy E2. It also reflects a number of existing such uses within Winnall, including sub area 1. It is therefore recommended that the policy be amended accordingly. As with our comments in relation to Policies E1 and E6 above, Policy W6(i) is somewhat ambiguous as it suggests that existing employment uses be retained, which could be interpreted as preventing the redevelopment of outdated employment sites / floorspace for modern employment premises. For avoidance of doubt, it is recommended that the policy be amended to state that the redevelopment of existing employment sites for employment use is supported.</p> <p>Finally, the policy adopts an inconsistent approach to the application of Policy E6. For example Policy E6 is referred in the introductory paragraph, and only afterwards in criteria W6(iv). There may be instances where individual sites within sub-area 1 are no longer appropriate or suitable for employment use, or that there is no such demand for premises in the future. As such, Policy W6 should incorporate the same flexibility for other uses to come forward where it can be demonstrated that the retention or provision of employment uses is no longer appropriate under Policy E6, in all sub-areas.</p> <p>We note that the Council's Consultation Comments document in relation to this Policy has not recognised or commented on the above points in relation to sub area 1, except for adding the definition of Class B2 and B8 uses. Our client therefore maintains it's position in relation to the above matters.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Consistent with our previous representations to the Regulation 18 Consultation, our client supports the general approach to employment land in Winnall and its specific allocation for employment use (page 337 in the Regulation 19 Consultation). It is however particularly important to ensure that future development of land within Winnall for appropriate employment uses, has clear support within the Local Plan.</p>

	<p>In this respect, and with particular focus on sub area 1, we reiterate that the references to B2 and B8 uses should be expanded to include support for Class E(g)(ii) and (iii) uses. The current proposed wording appears to have arisen following the changes to the Use Classes Order in 2020, wherein former B1 use Classes were incorporated within the new Class E (Class E(g)). However, these are still employment uses that are entirely appropriate to be undertaken in this location (in accordance with the allocation for 'employment' use), and should therefore be explicitly supported in the new Local Plan, as is the case within the current adopted Local Plan, which supports such uses (then falling within B1(b) and (c)) and which the adopted Plan considered to be traditional employment uses.</p> <p>This would ensure consistency with the definition of 'employment uses' within Policy E5 and the support for new employment opportunities at Winnall under Policy E2. It also reflects a number of existing such uses within Winnall, including sub area 1. It is therefore recommended that the policy be amended accordingly. As with our comments in relation to Policies E1 and E6 above, Policy W6(i) is somewhat ambiguous as it suggests that existing employment uses be retained, which could be interpreted as preventing the redevelopment of outdated employment sites / floorspace for modern employment premises. For avoidance of doubt, it is recommended that the policy be amended to state that the redevelopment of existing employment sites for employment use is supported.</p> <p>Finally, the policy adopts an inconsistent approach to the application of Policy E6. For example Policy E6 is referred in the introductory paragraph, and only afterwards in criteria W6(iv). There may be instances where individual sites within sub-area 1 are no longer appropriate or suitable for employment use, or that there is no such demand for premises in the future. As such, Policy W6 should incorporate the same flexibility for other uses to come forward where it can be demonstrated that the retention or provision of employment uses is no longer appropriate under Policy E6, in all sub-areas.</p> <p>We note that the Council's Consultation Comments document in relation to this Policy has not recognised or commented on the above points in relation to sub area 1, except for adding the definition of Class B2 and B8 uses. Our client therefore maintains it's position in relation to the above matters.</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)</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>	W6
<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/5/W6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W6
<b>Name of respondent (or client)</b>	Royal London Asset Management
<b>Personal reference number</b>	ANON-AQTS-3BBW-7
<b>Full reference number</b>	ANON-AQTS-3BBW-7/1/W6
<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 expanded upon below our clients (Royal London Asset Management) consider:</p> <p>i) the proposed removal of text providing ‘flexibility’ around non B-class uses within this part of the W6 allocation (from both the adopted Local Plan and Regulation 18 draft of the emerging Local Plan) is inappropriate and means that this part of the Local Plan is not “justified;” and</p> <p>ii) supporting text (para 12.67) should be amended to delete the current reference to the W6 area avoiding “out of town destination retail and other recreational proposals”. This reference is inconsistent with both national planning guidance and emerging Policy E4: Main Town Centre Uses Out of Centre which identify that retail and leisure proposals in such locations are appropriate in principle where they comply with the sequential and impact test (where the latter is applicable).</p> <p>We address both of these in turn below.</p> <p>i) Policy W6</p> <p>Whilst Royal London Asset Management supports the continued allocation of Winnall as an employment area under Policy W6 (Winnall) it considers that the Policy as currently worded is not “justified”. This is because criterion 2 (relating to ‘Sub Area 2’ of the Policy) does not include the flexibility for employment generating uses which sit outside of the B2 and B8 Use Classes. This flexibility is included in both the adopted Local Plan and was included in the Regulation 18 Draft of the emerging Local Plan.</p> <p>There are a number of established non B2 and B8 Class uses across Sub Area 2 of the allocation specifically including retail, hotel, car showroom and trade counter uses. Notably this includes a Tesco Extra foodstore and a Homebase retail unit. In addition, the Council have as recently as 2023 granted planning permissions for a McDonalds drive-thru restaurant and a Greggs drive-thru restaurant within Sub Area 2, both developments being non B2 and B8 uses.</p> <p>These established uses, will have been permitted over the years and are important generators of jobs and economic growth. The development of, and change to, non B2 and B8 Uses within the allocation/ Sub Area 2 has already taken place over time and the Policy should reflect the facts on the ground.</p> <p>Currently Policy WIN11(2) within the Winchester District Local Plan Part 2 – Development Management and Site Allocations (LPP2) (April 2017) does include such provision stating:</p>

“in sub area 2, along Easton Lane, the Council will adopt a more flexible approach in applying policy CP9 and may permit employment generating uses outside of the B1, B2, and B8 Use Classes”

Furthermore, within the emerging Local Plan, supporting text paragraph 12.67 states that Policy W6 allows “for a degree of flexibility in those parts of the employment area where change might be expected”.

Draft Policy W6 however includes no such flexibility. The exclusion of such text is compounded by revisions made to emerging Policy W6 between the Regulation 18 and Regulation 19 versions of the emerging Local Plan. The Regulation 19 version does not include the following criterion which was included under ‘Sub Area 2’ in the Regulation 18 version of the Policy:

“In sub area 2, along Easton Lane, the council will adopt a more flexible approach in applying Policy E6 (retention of employment land and premises) and may permit B use class employment generating uses outside of the B2 and B8 Use Classes.”

Indeed the Regulation 18 version of draft policy W6 went on to state:

“if a new town centre use as defined by the NPPF is proposed, provide evidence to show that the use requires an out-of-centre location and that a ‘sequential approach’ has been applied to demonstrate that the use could not reasonably be accommodated in a more sequentially-preferable location”

Neither this criterion, nor the reference to out of centre uses, are now included in the emerging Policy. This emphasises the ongoing necessity for Policy W6 to include flexibility for employment generating uses outside of the B2, and B8 Use Classes.

We note that the Council’s response to a representation (ref: BHLF-KSAR-N8BD-W) in relation to Policy W6 of the draft Local Plan Reg 18 , which was seeking the criteria for Sub Area 2 and 3 to be consistent with that for Sub Area 1 in relation to the presumption in favour or retention of existing B Use Class/ creation of additional B2 and B8, stated the following:

“Points noted but this is the whole reason why the Winnall industrial estate has been divided up into different zones. It is considered that there is more scope within sub area 2 and 3 for employment uses that fall outside of B2 and B3 uses [sic] which is an approach that has been taken in the existing adopted LP.

Recommendation: no change”

Whilst the Council in their response above recognises that Sub Area 2 and 3 have more scope for non B2 and B8 uses this is not reflected in the Reg 19 version of Policy W6. It is therefore not clear why the Council has deleted the reference to “flexibility” within emerging Policy W6.

Policy W6 is also not consistent with the Council’s own evidence base. The Winchester: Town Centres Study – Stage 2: Partial Refresh (July 2024) (para lxxi) prepared by Lambert Smith Hampton on behalf of the Council states:

“Emerging Local Plan Policy 6 (Winnall) makes provision for town centre uses where evidence shows that the use requires an out-of-centre location and that a ‘sequential approach’ has been applied. It is recommended that the policy wording is amended to include a reference to emerging Local Plan Policy E4 (Retail and Main Town Centre Uses) and the requirement for main town centre uses that exceed 350 sqm to be accompanied by an impact assessment.”

	<p>Based on the above, amendments are required to the Policy, and its supporting text, to ensure it contains flexibility for employment generating uses outside of the B2, and B8 Use Classes.</p> <p>ii) Supporting Text (para 12.67) National Planning Policy and emerging Policy E4 require proposals for non town centre uses (including retail) to comply with the sequential and impact tests (where applicable). Supporting text paragraph 12.67 conflicts with this policy position stating that the W6 area should “avoid out of town destination retail and other recreational proposals.” This wording is unduly onerous and inconsistent with national and emerging retail policy. It should be deleted.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amendments to Policy W6 and paragraph 12.67 are required – see suggested wording below.
<b>What is your suggested wording or text for the policy?</b>	<p>The following amendments are required to Policy W6 criterion ii) to ensure the Policy is appropriate: "In sub area 2, along Easton Lane, the council will adopt a more flexible approach in applying Policy E6 (retention of employment land and premises) and employment generating uses outside of the B2, and B8 Use Classes." This suggested wording reflects the wording in Policy WIN11 (Winnall) of the adopted Local Plan Part 2 – Development Management and Site Allocations (2017). As a result of the suggested amendments to the draft Policy W6 above, a consequential amendment is required to the supporting text to the Policy to ensure the internal consistency of the Plan. Paragraph 12.67 should be amended as follows: “The employment area in Winnall is the largest employment area in Winchester Town and generally the area is thriving with very few vacant premises. The employment area also includes several established non B2 and B8 uses that are important generators of jobs and economic growth. The policy therefore is aimed at retaining the core of the employment area in traditional employment uses (Use Classes B2 and B8) while allowing for a degree of flexibility in those parts of the employment area where change might be expected and would support the vitality and viability of the area. It also recognises the need to maximise opportunities to create additional B2 and B8 employment floorspace, improvements to community infrastructure, open space and green infrastructure provision.”</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>	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>	W6
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/4/W6
<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 W6 Winnall</p> <p>Southern Water is the statutory water and wastewater undertaker for the Winchester Town area. In accordance with this, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet a possible forecast demand for this proposal, based on a calculated flow rate.</p> <p>The assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development of the site. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure.</p> <p>Proposals for this site could generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement would be provided through the New Infrastructure charge, but Southern Water would need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless any requisite works are implemented in advance of occupation. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023).</p> <p>We have also made an initial assessment of this site and ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Accordingly, we propose the following additional criterion for Policy W6: Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</p>

	Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We propose the following additional criterion for Policy W6: Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.
<b>What is your suggested wording or text for the policy?</b>	Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.
<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 (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	W6
<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)/2/W6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
<b>What is your suggested wording or text for the policy?</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.



<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="#">Email (Commenting on NE8)</a> <a href="#">Letter (Commenting on policies)</a> <a href="#">Email correspondence (Re policy NE8)</a>

<b>Policy/Evidence base document</b>	W6
<b>Name of respondent (or client)</b>	Three Maid LLP
<b>Personal reference number</b>	ANON-AQTS-32F2-P
<b>Full reference number</b>	ANON-AQTS-32F2-P/1/W6
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Winnall</p> <p>The primary purpose of the allocation at Winnall (Policy W6) is to safeguard the existing industrial premises within the Estate, recognising its scale and significance to the Winchester economy. Whilst the proposed policy allows for redevelopment, a review of the Council's online planning register shows that there has been very limited applications within the existing industrial area and thus the contribution that this site will make to meeting the identified employment needs is questionable.</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>	Yes <a href="#">Letter (commenting on Policies and Evidence Base)</a>

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

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

Local Plan Reference or document	Policy W7 Central Winchester Regeneration	
Total Number of Representations received.	18	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	10	6
Sound	6	10
Complies with Duty to Cooperate	9	7
<p><b>Summary of Representations</b></p> <p>Respondents expressed concern that there is not yet a coherent masterplan for the site which is impacting landowners who face uncertainty. Concerns were expressed regarding public engagement process around key regeneration projects and the need for a more detailed and collaborative planning approach. Comments were made regarding sustainability and environmental issues of redeveloping this site and the need to address flood risks, improving infrastructure, and balancing the need for development across brownfield and greenfield sites.</p> <p>More detail is required on the proposed housing strategy, dwelling calculations and the need for comprehensive spatial plan whilst there were also concerns over affordable housing. In terms of education provision, as schools in this immediate area are under pressure this will require further investigation.</p> <p>Comments were also made regarding the proposal to relocate the bus station and the need for a detailed movement strategy that is supported sustainable transport including walking, cycling and public transport.</p> <p>There was also the need for high-quality design and public spaces.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/5/W7</p> <p>ANON-AQTS-3BSY-T/40/W7</p> <p>ANON-AQTS-3B46-R/1/W7</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/15/W7</b></p> <p>ANON-AQTS-3299-G/9/W7</p> <p><b>ANON-AQTS-32UK-X - Environment Agency/11/W7</b></p> <p>ANON-AQTS-32N2-X/3/W7</p> <p>ANON-AQTS-32N9-5/3/W7</p> <p>ANON-AQTS-329Q-8/18/W7</p> <p>ANON-AQTS-32SJ-U/6/W7</p> <p><b>ANON-AQTS-327U-A - Southern Water/18/W7</b></p> <p>ANON-AQTS-32T7-9/6/W7</p>		

ANON-AQTS-32T4-6/3/W7

ANON-AQTS-32K9-2/1/W7

ANON-AQTS-3B8M-K/9/W7

BHLF-AQTS-326P-4/3/W7

BHLF-AQTS-32YQ-8/3/W7

**BHLF-AQTS-328R-8 - Hampshire County Council/13/W7**

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

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

<b>Policy/Evidence base document</b>	W7
<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/11/W7
<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 this policy which acknowledges the rivers and flood risk onsite. There is an incorrect use of the word 'Strategic' at the start of point xvi – it should say 'site-specific':  "A site-specific Flood Risk Assessment will need to be prepared..."</p> <p>There is a small amount of Flood Zone 3b within the site boundary according to Winchester District Council's Level 2 Strategic Flood Risk Assessment (July 2024). We would encourage that a detailed site-specific Flood Risk Assessment (FRA) demonstrates that there will be no inappropriate development within Flood Zone 3b in accordance with Table 2 of the Planning Practice Guidance for Flood risk and coastal change. Ideally, this would be stated within the policy (we suggest within point xvi.).</p> <p>We are supportive of the inclusion of points xviii. and xix.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>We are supportive of this policy which acknowledges the rivers and flood risk onsite. There is an incorrect use of the word 'Strategic' at the start of point xvi – it should say 'site-specific':  "A site-specific Flood Risk Assessment will need to be prepared..."</p> <p>There is a small amount of Flood Zone 3b within the site boundary according to Winchester District Council's Level 2 Strategic Flood Risk Assessment (July 2024). We would encourage that a detailed site-specific Flood Risk Assessment (FRA) demonstrates that there will be no inappropriate development within Flood Zone 3b in accordance with Table 2 of the Planning Practice Guidance for Flood risk and coastal change. Ideally, this would be stated within the policy (we suggest within point xvi.).</p> <p>We are supportive of the inclusion of points xviii. and xix.</p>
<b>What is your suggested wording or text for the policy?</b>	Wording to be added to point xvi.. "no inappropriate development shall take place within Flood Zone 3b (functional floodplain)"
<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>	W7
<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-8/18/W7
<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 Central Winchester Regeneration Area is an existing Local Plan allocation (WIN4) that is proposed to be carried forward. It is noted that this site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the Local Plan Review (adopted 2006). It has still not been delivered. As a brownfield site it is not expected to deliver the same level of affordable housing as greenfield sites. Given the priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites, including those that have not delivered any housing to date, and greenfield sites that are more readily delivered and can provide higher levels of affordable housing. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield.</p> <p>There are opportunities for growth beyond Winchester Town on sites such as Mill Lane, Wickham, which are not constrained, and which could readily be brought forward during the plan period.</p> <p>It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), performs better than Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024- 1026).</p> <p>Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, performs similarly to the Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) in terms of sustainability (refer to Appendix F, pages 1033-1035), despite it being located in Winchester itself.</p> <p>We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The Central Winchester Regeneration Area is an existing Local Plan allocation (WIN4) that is proposed to be carried forward. It is noted that this site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the Local Plan Review (adopted 2006). It has still not been delivered. As a brownfield site it is not expected to deliver the same level of affordable housing as greenfield sites. Given the priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites, including those that have not delivered any housing to date, and greenfield sites that are</p>

	<p>more readily delivered and can provide higher levels of affordable housing. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield.</p> <p>There are opportunities for growth beyond Winchester Town on sites such as Mill Lane, Wickham, which are not constrained, and which could readily be brought forward during the plan period.</p> <p>It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), performs better than Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024- 1026).</p> <p>Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, performs similarly to the Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) in terms of sustainability (refer to Appendix F, pages 1033-1035), despite it being located in Winchester itself.</p> <p>We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>The Central Winchester Regeneration Area is an existing Local Plan allocation (WIN4) that is proposed to be carried forward. It is noted that this site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the Local Plan Review (adopted 2006). It has still not been delivered. As a brownfield site it is not expected to deliver the same level of affordable housing as greenfield sites.</p> <p>Given the priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites, including those that have not delivered any housing to date, and greenfield sites that are more readily delivered and can provide higher levels of affordable housing. Consequently, the draft strategy needs to be altered so that there is a better balance between greenfield and brownfield.</p> <p>There are opportunities for growth beyond Winchester Town on sites such as Mill Lane, Wickham, which are not constrained, and which could readily be brought forward during the plan period.</p> <p>It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), performs better than Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024- 1026).</p> <p>Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, performs similarly to the Central Winchester Regeneration site (refer to Appendix F, Site Assessment, pages 1148-1150) in terms of sustainability (refer to Appendix F, pages 1033-1035), despite it being located in Winchester itself.</p> <p>We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.</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>	W7
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/5/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Looks like a very sensible proposal. I would expect high quality design and architecture etc in an area close to the Town Hall. Need to fix the current drainage problems at that end of town as a prerequisite. Idea of removing parking in front of Alfred Statue is excellent and a small park or area for people to take photos seems ideal. Let's get on with it - get some timescales and then challenge ourselves to complete the project to high quality standard in half the time.
<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>	No

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

<b>Policy/Evidence base document</b>	W7
<b>Name of respondent (or client)</b>	Extinction Rebellion Winchester
<b>Personal reference number</b>	ANON-AQTS-32N9-5
<b>Full reference number</b>	ANON-AQTS-32N9-5/3/W7
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Paragraph 5.5 (Page 85) of the Proposed Submission Local Plan (Regulation 19), states that one of the main opportunities identified in the Broadway is to “Move the bus station to the rail station area and develop the site with city centre uses”. We support this idea; however it does not appear that enough space has been set aside in the allocation for the station area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Planning Authority should ensure that enough space is set aside within the Station Approach development to include a transport interchange.
<b>What is your suggested wording or text for the policy?</b>	The Planning Authority should ensure that the master plan for Station Approach sets aside enough space to include a transport interchange.
<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>	W7
<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/9/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.
<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>	W7
<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-32T7-9/6/W7
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy W7: Central Winchester Regeneration (CWR) My client supports the principle of an allocation at CWR for mixed use including approximately 300 dwellings. However, this is a long standing allocation that has been carried forward from previous adopted Plans. It is a complex site with significant constraints including both built heritage and archaeology, flood risk and securing nutrient neutrality. Whilst a development partner was secured in 2023, consultation and engagement are ongoing and there are currently no timescales for the submission of an application. Therefore, for similar reasons in respect of Policy W2 above, the delivery of approximately 300 dwellings within the plan period to 2040 is ambitious.
<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 and proposed site)</a>

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

<b>Policy/Evidence base document</b>	W7
<b>Name of respondent (or client)</b>	Kim Gottlieb
<b>Personal reference number</b>	ANON-AQTS-3B46-R
<b>Full reference number</b>	ANON-AQTS-3B46-R/1/W7
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>I have entered "no" in the above boxes as there was no N/A or 'no comment' box available.</p> <p>I write as an owner of land within the area covered by Policy W7. I am generally supportive of the intention of the Policy, but I wish to bring the following points to the attention of the Inspector.</p> <p>Paragraph ii requires that proposals should not "prejudice the implementation of the masterplan for the whole of the site". At the date that representations on the Reg 19 submission closes (13.10.24), there is no "masterplan" in existence, not even a draft one, so there is no way for me, or any other owners of any other parts of the site, to know what it is that we might potentially prejudice.</p> <p>The concern is compounded by the fact the overwhelming majority of the land, both green and orange - the difference seems not to be defined - is owned by Winchester City Council. In this instance the Council is not just the planning authority but a party with a significant financial interest. I am aware that the Council's development partner, a syndicate of developers called Jigsaw, is in the course of producing its own masterplan, but none of the details of it, its proposed uses, its design and even its extent, are in the public domain. I have seen no plan even privately.</p> <p>In such circumstances, I believe that the requirement to defer to an unknown masterplan may be regarded as inappropriate and premature. Accordingly, I would like to reserve my position and to be able to address the Inquiry, by which time more about the masterplan, if any, may be known.</p> <p>For the purpose of full disclosure, I would add that, as a City Councillor (at the time), I successfully judicially reviewed the Council's previous proposals for this site in 2015. Knowing full well the lengthy and chequered history of this site, I believe that it is of the utmost importance that everything is done correctly this time around.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The removal of paragraph ii.

<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>	W7
<b>Name of respondent (or client)</b>	Liz Kessler
<b>Personal reference number</b>	BHLF-AQTS-32YQ-8
<b>Full reference number</b>	BHLF-AQTS-32YQ-8/3/W7
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Strategic Policy W7 Central Winchester Regeneration area The CWR area SPD highlighted the importance of the Broadway, recognising it as a public space with huge potential which is crucial to the success of development of the area and town; this should be more positively reflected in Section xi.
<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>	W7
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/6/W7
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy W7: Central Winchester Regeneration (CWR) My client supports the principle of an allocation at CWR for mixed use including approximately 300 dwellings. However, this is a long standing allocation that has been carried forward from previous adopted Plans. It is a complex site with significant constraints including both built heritage and archaeology, flood risk and securing nutrient neutrality. Whilst a development partner was secured in 2023, consultation and engagement are ongoing and there are currently no timescales for the submission of an application. Therefore, for similar reasons in respect of Policy W2 above, the delivery of approximately 300 dwellings within the plan period to 2040 is ambitious.
<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="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

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

<b>Policy/Evidence base document</b>	W7
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/15/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Whilst there has been good collaboration between the ICB and WCC during the Local Plan process, our request is an amendment to the policy as outlined in the full response which has been submitted via email on 08/10/2024. - Whilst there is supporting text for healthcare infrastructure there is no inclusion within the policy that directly supports the need for sufficient healthcare infrastructure. The policy needs an inclusion to contribute to Health infrastructure as per the Education reference
<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>	Yes <a href="#">Letter (commenting on policies)</a>



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

<b>Policy/Evidence base document</b>	W7
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/13/W7
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	300 dwellings could generate up to 90 primary age pupils and 63 secondary. However, that depends on the type of housing proposed with flats, for example, unlikely to generate as many. The catchment schools serving this site are St Bede CE Primary and Westgate All through School. These schools are under pressure, so depending on the type of dwellings proposed, further consideration would be needed as to the mitigation for the educational impact of this development.
<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>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

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

<b>Policy/Evidence base document</b>	W7
<b>Name of respondent (or client)</b>	Patrick Davies
<b>Personal reference number</b>	ANON-AQTS-32T4-6
<b>Full reference number</b>	ANON-AQTS-32T4-6/3/W7
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Removing the bus station from the City Centre to the Railway station is entirely wrong and has never been properly discussed in the production of this regulation 19 document.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Delete the proposal and retain a central Winchester bus station
<b>What is your suggested wording or text for the policy?</b>	Delete the proposal and retain a central Winchester bus station
<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>	W7
<b>Name of respondent (or client)</b>	Peter Reeves
<b>Personal reference number</b>	ANON-AQTS-32K9-2
<b>Full reference number</b>	ANON-AQTS-32K9-2/1/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	With reference to Policy W7 as per the local plan as referenced at sub paragraph 3, and specifically “The proposals provide an appropriate mix of uses that reinforce and complement the town centre, including retail.....”. Winchester is undoubtedly the oldest High Street in England. The emphasis on encouraging retail development away from the central business area has largely failed with the Brooks. It would seem appropriate to relegate the emphasis to “including retail..” from this list.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	I suggest you relegate or remove the reference to “including retail” from the listing at W7, sub para (iii).
<b>What is your suggested wording or text for the policy?</b>	At W7, sub paragraph (iii) omit “retail” from the listing.
<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>	W7
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/9/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	A separate response is addressing 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>	W7
<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/40/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W7
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/18/W7
<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 welcome the inclusion of the criterion below for Policy W7 Central Winchester Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p> <p>Supporting Text: This is because our initial assessment of this site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</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>	Yes <a href="#">Supporting Document (Commenting on policies)</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>	W7
<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-4/3/W7
<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. Comment</p> <p>The site plan on page 341 shows the site allocation in two colours, green and brown. No key is provided. This divides the site into two areas, when compared to the site area used in the adopted Supplementary Planning Document (SPD) para 12.71, which included the green and brown areas to be part of the regeneration development for the area, including the current Cossack Lane surface car park north of Friarsgate.</p> <p>Objections</p> <p>1.The Allocated Use is mixed use with an indicative number of dwellings of 300. No detailed masterplan has been prepared for the Central Area following the adoption of the SPD. An explanation of how this number of dwellings has been calculated needs to be provided. This and other policies for development sites in Winchester Town should take account of the provisions of paragraph 127(a) of the NPPF, that minimum density standards should be set.</p> <p>2.We are concerned there is insufficient direction about the management of movement in and through the development. The Trust recognises there is no clarity about how movement around Winchester is to be planned, given the lack of any details developed under the Winchester Movement Strategy, which is one of the reasons we have argued for the production of a spatial plan for Winchester Town. We therefore take the view that the wording of paragraphs vii. and x. is too loose and would be improved if these were combined and reworded to indicate a clearer way forward, by requiring the Winchester Movement Strategy to be developed with proposals for movement around Winchester before a masterplan is prepared. This would be in line with the vision-led approach for sustainable transport now required by paragraph 112 of the NPPF.</p> <p>The present wording of the two paragraphs is: Policy W7 vii. “The proposals improve facilities for those walking, cycling and wheeling, in line with the LCWIP and Winchester Movement Strategy.” Policy W7 x. “The proposals make the provision for buses and coaches.” These policies need to be combined to state something along the lines of:</p>

	<p>“The proposals for movement and access to and within the regeneration area must be made within the context of the Winchester Movement Strategy. This Strategy needs to be developed with detailed and adopted proposals for traffic, public transport, access, deliveries, walking, cycling and pedestrian zones to achieve the objectives set out in the Strategy, in order to provide the required movement context before a masterplan for the comprehensive mixed-use development of the area is prepared.”</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 (copy of form - response detailed in letter)</a>  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	W7
<b>Name of respondent (or client)</b>	Winchester City Council
<b>Personal reference number</b>	ANON-AQTS-32N2-X
<b>Full reference number</b>	ANON-AQTS-32N2-X/3/W7
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The Council has a number of regeneration projects underway at different stages of the development process as described below. Some of the projects have benefitted from technical studies that have not yet been shared with the Local Planning Authority or statutory consultees. These could impact the wording of the relevant policies in the Regulation 19 Local Plan. We are keen to support the Local Plan process by demonstrating the Council's commitment to delivering these projects and are happy to attend the inquiry if it helps to demonstrate where these projects are in delivery.</p> <p><b>W7 Central Winchester Regeneration</b>  The Council is the majority landowner within the Central Winchester Regeneration (CWR) area and the sole landowner for the site currently coming forward for redevelopment and has a development partner on board with a signed Development Agreement.  The CWR area has an adopted Supplementary Planning Document and development will come forward in line with the guidance <a href="https://www.winchester.gov.uk/assets/attach/17057/Central-Winchester-Regeneration-Supplementary-Planning-Document.pdf">https://www.winchester.gov.uk/assets/attach/17057/Central-Winchester-Regeneration-Supplementary-Planning-Document.pdf</a></p> <p>The council appointed Partnerships &amp; Places LLP (known as Jigsaw) as the development partner in March 2023 and the Development Agreement between the two parties completed in April 2024.  <a href="https://democracy.winchester.gov.uk/ieListDocuments.aspx?CId=136&amp;MId=4196">https://democracy.winchester.gov.uk/ieListDocuments.aspx?CId=136&amp;MId=4196</a>  <a href="https://partnershipsandplaces.co.uk/">https://partnershipsandplaces.co.uk/</a> Extensive preparatory work has been carried out both by the council and Jigsaw in order for a Development Delivery Plan (DDP) to be presented to Cabinet in December 2024 which will map out the approach, strategies and timelines for delivery. Capacity studies have been carried out together with relevant financial modelling to establish a baseline.</p> <p>Work on the RIBA stage design process is due to start in Jan 2025. It is expected that the planning application will be ready to submit, together with the full business case, in November 2025 with a subsequent start on site in August 2027.</p>

	<p>Extensive public engagement has been carried out up to this point and this will remain the case throughout the lifetime of the project. Outputs to date can be seen here: <a href="https://cwr.commonplace.is/">https://cwr.commonplace.is/</a></p> <p>The council and Jigsaw are working in partnership to deliver a scheme that will deliver a vibrant, mixed use scheme to enhance the Winchester offer, provide much needed space for young people to live and work in the city and that brings wider social and economic benefits across the city and hence the district.”</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>In consultation with the Council’s development partner Jigsaw, the need for flood risk to be addressed is understood.</p> <p>It is thought there may be other approaches to mitigating flood risk that do not require a strict 8m buffer on the watercourse, which would sterilise a significant part of this key site.</p> <p>WCC/Jigsaw intend to hold a series of discussions with EA in the coming months. And the outcome of those discussions will inform the emerging project.</p> <p>For that reason it is thought better that the Plan reflects this approach, and WCC/Jigsaw will be able to update the Local Plan Examination on progress made in discussing this point with the EA.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>xviii. Due to flooding, development should be set back from the watercourse and no development should be within 8m of the watercourse or SUCH other approach demonstrated to be acceptable following discussions with the Environment Agency and the Lead Local Flood Authority. Compensatory storage may be required;</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>



**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) agreed with the Environment Agency regarding criterion xvi.

[Proposed Modification](#) agreed with the HIOW ICB regarding addition of wording in criterion xv of Policy W7



Local Plan Reference or document	Policy W8 Station Approach Regeneration Area	
Total Number of Representations received.	19	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	11	5
Sound	5	11
Complies with Duty to Cooperate	10	6
<p><b>Summary of Representations</b></p> <p>There was support for mixed-use development on this site that includes a transport hub, with a suggestion that there is there is the need for greater flexibility for the uses that would be allowed on the site as it is not located in the historic centre. There were concerns regarding the impact on office vacancies and the need to manage movement, particularly buses, within the Winchester Movement Strategy and to connect together key locations in the town centre, educational institutions and employment area in order to unlock the sites full potential.</p> <p>Respondents expressed concern regarding the absence of references to the Local Cycling and Walking Infrastructure Plan (LCWIP) and the need to help address a reduction in car use. Comments were made that the public engagement process had been robust, and it had allowed people to input shaping and refining the development principles that were included in the recent public consultation on the draft Concept Masterplan.</p> <p>There were also comments regarding the need to ensure that the trees on the site were preserved and the need to plant more trees as part of any redevelopment proposals. Alongside this there was the need to integrate environmental quality into any public realm improvements on the site.</p> <p>Comments were also made on the need for better provision for the elderly and those with mobility challenges as part of the redevelopment of the site. Deliverability of the site was questioned given that the site is in multiple land ownerships and how this aligns with the delivery timescale.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/3/W8</p> <p>ANON-AQTS-3BR1-H/3/W8</p> <p>ANON-AQTS-3BJD-V/1/W8</p> <p>ANON-AQTS-3BSY-T/31/W8</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/12/W8</b></p> <p>ANON-AQTS-3299-G/7/W8</p> <p>ANON-AQTS-32N2-X/2/W8</p>		

ANON-AQTS-32N9-5/2/W8

ANON-AQTS-329Q-8/13/W8

ANON-AQTS-32SJ-U/5/W8

**ANON-AQTS-327U-A - Southern Water/14/W8**

ANON-AQTS-32T7-9/5/W8

ANON-AQTS-32T4-6/2/W8

ANON-AQTS-3B8M-K/4/W8

BHLF-AQTS-326P-4/2/W8

BHLF-AQTS-32YQ-8/2/W8

**BHLF-AQTS-32YH-Y - Network Rail/2/W8**

BHLF-AQTS-3284-A/7/W8

**BHLF-AQTS-328R-8 - Hampshire County Council/9/W8**

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

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

<b>Policy/Evidence base document</b>	W8
<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/7/W8
<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. Fails to reference the city LCWIP, which is very relevant to this area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Add reference to LCWIP.
<b>What is your suggested wording or text for the policy?</b>	In para iv: “...enabling people to walk and cycle for most everyday trips and improving those links to the railway station, the surrounding area and other key destinations in accordance with the Winchester City LCWIP;”
<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)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W8
<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-8/13/W8
<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 Station Approach Regeneration Area is an existing Local Plan allocation (WIN5, 6 and 7) that is proposed to be carried forward as it has not been delivered. The plan identifies at paragraph 12.82 (as it did at Regulation 18 stage) that the land is in multiple land ownerships and that there are differing programmes and priorities that make it likely that the site will be brought forward in stages over the plan period. Given this, it is questioned how deliverable this site actually is.</p> <p>As with other brownfield sites, the level of affordable housing to be delivered would be lower than that of a greenfield site. Given the local priority to deliver affordable housing and the issues associated with bringing forward this site, consideration should be given to providing additional development elsewhere on greenfield sites. It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores reasonably similarly to the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026) and is under single ownership.</p> <p>Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also performs broadly similarly the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) in terms of sustainability within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035). This site is in single ownership and more likely to be deliverable than the Station Approach Regeneration Area site and can provide 40% affordable housing, as it is greenfield, as opposed to the 30% provided at Station Approach Regeneration site. We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.</p>
<b>What modification(s) are necessary to make the</b>	The Station Approach Regeneration Area is an existing Local Plan allocation (WIN5, 6 and 7) that is proposed to be carried forward as it has not been delivered. The plan identifies at paragraph 12.82 (as it did at Regulation 18 stage) that the land is in multiple land ownerships and that there are differing programmes

<p><b>policy legally compliant or sound?</b></p>	<p>and priorities that make it likely that the site will be brought forward in stages over the plan period. Given this, it is questioned how deliverable this site actually is.</p> <p>As with other brownfield sites, the level of affordable housing to be delivered would be lower than that of a greenfield site. Given the local priority to deliver affordable housing and the issues associated with bringing forward this site, consideration should be given to providing additional development elsewhere on greenfield sites.</p> <p>It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores reasonably similarly to the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026) and is under single ownership.</p> <p>Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also performs broadly similarly the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) in terms of sustainability within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035). This site is in single ownership and more likely to be deliverable than the Station Approach Regeneration Area site and can provide 40% affordable housing, as it is greenfield, as opposed to the 30% provided at Station Approach Regeneration site.</p> <p>We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The Station Approach Regeneration Area is an existing Local Plan allocation (WIN5, 6 and 7) that is proposed to be carried forward as it has not been delivered. The plan identifies at paragraph 12.82 (as it did at Regulation 18 stage) that the land is in multiple land ownerships and that there are differing programmes and priorities that make it likely that the site will be brought forward in stages over the plan period. Given this, it is questioned how deliverable this site actually is.</p> <p>As with other brownfield sites, the level of affordable housing to be delivered would be lower than that of a greenfield site. Given the local priority to deliver affordable housing and the issues associated with bringing forward this site, consideration should be given to providing additional development elsewhere on greenfield sites.</p> <p>It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), scores reasonably similarly to the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) from a sustainability perspective within the Regulation 19 Integrated Impact Assessment Report, published July 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026) and is under single ownership.</p> <p>Additionally, the Land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan previously promoted, also performs broadly similarly the Station Approach Regeneration Area site (refer to Appendix F, Site Assessment Proforma, page 1151-1153) in terms of sustainability within the Integrated</p>

	<p>Impact Assessment Report (refer to Appendix F, pages 1033-1035). This site is in single ownership and more likely to be deliverable than the Station Approach Regeneration Area site and can provide 40% affordable housing, as it is greenfield, as opposed to the 30% provided at Station Approach Regeneration site. We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to 100 and significantly elevate the number of affordable housing units from 16 to 40 on the site.</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>	W8
<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/1/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Section 12.85 says "Reduce private car use", but we NEED private cars, & parking, especially for the elderly and disabled, who can't cycle or walk long distances or even wait long periods for a bus. 12.34 suggests a "Quiet Way" through Swan Lane, but Swan Lane must still allow private cars & minibus for residents, funeral parlour & the many old folks' activities in the Baptist church hall every week, where they are brought by car & minibus. They need to be brought to the city for other things too by car.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Extend a form of blue badge to allow over-75s to come into the city in private car or minibus and park. Many elderly folk are not disabled enough for a blue badge, but find bus access difficult & can't cycle, or walk long distances. Their activities in the city are important to them, giving purpose in life. Don't stop these by banning private cars.
<b>What is your suggested wording or text for the policy?</b>	Stress 6.37: " It is important that the needs of those with reduced mobility are not overlooked. Private car parking for such users will be supported". Undercover parking for cycles & mobility scooters will be supplied, & private cars/minibuses transporting old & disabled people will not be restricted or overpriced in parking. An extended form of blue badge will be introduced for these people.
<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>	No

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



<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	Craig Hatton
<b>Personal reference number</b>	BHLF-AQTS-32YH-Y - Network Rail
<b>Full reference number</b>	BHLF-AQTS-32YH-Y - Network Rail/2/W8
<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>Network Rail supports the allocation and the principles behind this. On-going discussions will need to take place with both Network Rail and South Western Railway over the delivery of the railway car park as part of the allocation. This appears to be sufficiently covered by part i of the Policy. The monitoring of capacity at Winchester rail station should be an integral part of the approach to this regeneration area. Network Rail believe that this can be covered through the masterplan approach involving landowners and interested parties as stated in part i of the Policy.</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.</i>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/3/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Very sensible proposal for a mixed use site. Would expect more liberal requirements on planning as this site is not in the historic centre. Opportunity for transport hub to be included. Would expect that private money would find this site attractive. Concern over nearby vacancies in existing offices? Let's get on with it.
<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>	W8
<b>Name of respondent (or client)</b>	Extinction Rebellion Winchester
<b>Personal reference number</b>	ANON-AQTS-32N9-5
<b>Full reference number</b>	ANON-AQTS-32N9-5/2/W8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	3.1.1 Paragraph 5.5 (Page 85) of the Proposed Submission Local Plan (Regulation 19), states that one of the main opportunities identified in the Broadway is to “Move the bus station to the rail station area and develop the site with city centre uses”. We support this idea; however it does not appear that enough space has been set aside in the allocation for the station area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Planning Authority should ensure that the master plan for Station Approach sets aside enough space to include a transport interchange.
<b>What is your suggested wording or text for the policy?</b>	The Planning Authority should ensure that the master plan for Station Approach sets aside enough space to include a transport interchange.
<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>	W8
<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/7/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.

<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>	W8
<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-32T7-9/5/W8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy W8: Station Approach Station Approach is another long-standing allocation carried forward from previous adopted Plans. Whilst design concept plans are currently being developed by consultants, there is no development partner in place. My client again supports the ambition of the Policy to secure the regeneration of this brownfield site, but its deliverability and timescales for delivery are again highly questionable in the absence of more detailed evidence.
<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="#">Letter (commenting on policies and proposed site)</a>

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



<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	Liz Kessler
<b>Personal reference number</b>	BHLF-AQTS-32YQ-8
<b>Full reference number</b>	BHLF-AQTS-32YQ-8/2/W8
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Strategic Policy W8 Station Approach While supporting the different aspects of this this policy the area identified is too restrictive. To succeed the most crucial element of the public realm is the streets and their connections to the town centre, many places of education, the university and hospital as well as adjacent residential and employment areas. The area contains many offices, too many of which are empty, and the site by site approach to the masterplan is too restrictive to the area's potential and its importance to the city as a whole.
<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>	W8
<b>Name of respondent (or client)</b>	Lois Gravely
<b>Personal reference number</b>	ANON-AQTS-3BR1-H
<b>Full reference number</b>	ANON-AQTS-3BR1-H/3/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Paragraph viii. There are many trees in this area and I believe it is vital to retain these unless any are very sickly and a danger to the public. Planting more appropriate trees may also be beneficial so long as they are given after care.
<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>	W8
<b>Name of respondent (or client)</b>	Mar, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/5/W8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy W8: Station Approach Station Approach is another long-standing allocation carried forward from previous adopted Plans. Whilst design concept plans are currently being developed by consultants, there is no development partner in place. My client again supports the ambition of the Policy to secure the regeneration of this brownfield site, but its deliverability and timescales for delivery are again highly questionable in the absence of more detailed evidence.
<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>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

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

<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/12/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Whilst there has been good collaboration between the ICB and WCC during the Local Plan process, our request is an amendment to the policy as outlined in the full response which has been submitted via email on 08/10/2024. - Whilst there is supporting text for healthcare infrastructure there is no inclusion within the policy that directly supports the need for sufficient healthcare infrastructure. The policy needs an inclusion to contribute to Health infrastructure as per the Education reference
<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>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/9/W8
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	250 dwellings would generate up to 75 primary age pupils and 53 secondary age pupils. However, that depends on the type of housing proposed with flats, for example, unlikely to generate as many. The catchment schools serving this site are St Bede CE Primary, Western CE Primary and Westgate All through School. These schools are under pressure, so depending on the type of dwellings proposed, further consideration would be needed as to the mitigation for the educational impact of this development.
<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>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>



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

<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	Patrick Davies
<b>Personal reference number</b>	ANON-AQTS-32T4-6
<b>Full reference number</b>	ANON-AQTS-32T4-6/2/W8
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The railway station is too far from the City Centre for a bus station. See my comments on the Central Area proposals above.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Delete the proposals for a bus station here.
<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>	W8
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/4/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Para 12.74 onwards and Policy W8 are inconsistent about a transport interchange at the railway station. The strategic value of this site to effect transport emissions reduction across the whole district will not be realised.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The essential element of the vision for the Station Approach Area in para 5.59b to co-locate the bus station at the railway station to create a transport interchange is not reflected in policy W8 and needs to be added. The September 2024 draft plan does not provide for this at sufficient scale. To provide an interchange capable of delivering Taktfahrplan interchange facilities on the Swiss model, the type of facilities capable of reducing car use at the necessary scale, will require far more land than the current plans have allocated. It will certainly not be possible to do this in a square shared with pedestrians in front of the station. The bus transport interchange at Amersfoort in the Netherlands, for example, indicates the scale of what would be required.
<b>What is your suggested wording or text for the policy?</b>	Insert new sub-policy ii and renumber subsequent sub-policies ii This site has a key role to play in the reduction of transport emissions in the district and must play a major part in enabling the district to reach the target of net zero emissions by 2030. Sufficient space should be allocated for bus bays that will enable a transport interchange for all bus and train services serving Winchester Town. Services on a frequency of 30 minutes or less would all have to meet simultaneously and this will require considerable space.
<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>	W8
<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/31/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W8
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/14/W8
<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 welcome the inclusion of the criterion below for Policy W8 Station Approach. Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p> <p>Supporting Text:  This is because our initial assessments of this site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</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>	Yes <a href="#">Supporting Document (Commenting on policies)</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>	W8
<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-4/2/W8
<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>Our objection to the policy for the Central Winchester Regeneration Area, W7, included comments about insufficient direction for the management of movement and we have a similar objection to this policy. While the supporting text in paragraph 12.85 refers to encouraging active travel options and the opportunities to reduce the use of cars, there is no reference to the role of buses in the policy and no reference at all to the Winchester Movement Strategy, or that it should be progressed from its current lack of content in a way that will give direction to the connection of movement to and from the Station, the rest of Winchester and the surrounding areas.</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 (copy of form - response detailed in letter)</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 \(commenting on policies\)](#)

<b>Policy/Evidence base document</b>	W8
<b>Name of respondent (or client)</b>	Winchester City Council
<b>Personal reference number</b>	ANON-AQTS-32N2-X
<b>Full reference number</b>	ANON-AQTS-32N2-X/2/W8
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The Council has a number of regeneration projects underway at different stages of the development process as described below. Some of the projects have benefitted from technical studies that have not yet been shared with the Local Planning Authority or statutory consultees. These could impact the wording of the relevant policies in the Regulation 19 Local Plan. We are keen to support the Local Plan process by demonstrating the Council's commitment to delivering these projects and are happy to attend the inquiry if it helps to demonstrate where these projects are in delivery.</p> <p>The Council is a major landowner within the Station Approach site allocation owning both Cattlemarket/Worthy Lane and Gladstone Street carparks as well as the former registry office building and adjacent land.</p> <p>In July 2022, the Council's Cabinet agreed a new approach to be undertaken to determine whether a viable project could be brought forward at Station Approach (CAB3349). This involved a number of workstreams including working with adjacent landowners, embarking on a comprehensive and active engagement with the community and undertaking a capacity study:</p> <p>Agenda for Cabinet on Tuesday, 19th July, 2022, 9.30 am - Winchester City Council  In March 2023, Cabinet Regeneration Committee received report (CAB3399R) setting out the results of this initial engagement and consultation with local residents and key stakeholders:  Agenda for Cabinet Committee: Regeneration on Thursday, 9th March, 2023, 2.00 pm - Winchester City Council. The engagement programme had involved a series of initiatives designed to reach a wide audience and gather views on draft development principles that had been produced jointly with Network Rail and London Continental Railways as well as to understand what people valued about the area and what they would like to see improved/developed. The consultation was generally well received and resulted in over 1000 responses been submitted for review which have fed into the capacity study work.  In June 2023, Cabinet Regeneration Committee received report (CAB3407R) setting out the results of the capacity study:</p>

	<p>Agenda for Cabinet Committee: Regeneration on Wednesday, 7th June, 2023, 10.00 am - Winchester City Council. In July 2023, the Council's Cabinet received report CAB3413 and took the decision to develop a Concept Masterplan for Station Approach: Agenda for Cabinet on Tuesday, 18th July, 2023, 9.30 am - Winchester City Council. In November 2023, the Council appointed a multi-disciplinary team led by award winning local architect firm Design Engine to produce the Concept Masterplan. A baseline analysis for the site has been undertaken followed by a series of stakeholder workshops to inform draft proposals.</p> <p>The Council is now consulting on these draft proposals: Have your say - Station Approach (<a href="http://winchesterstationapproach.co.uk">winchesterstationapproach.co.uk</a>) The consultation opened on 16th September and will close on 27 October 2024. The consultation responses will then be reviewed and help shape and inform the final plan. It is expected that the final Concept Masterplan will be submitted to the Council's Cabinet for approval in March 2025. Once the Concept Masterplan is approved the business case will be progressed. It is anticipated that sites will come forward within the Local Plan period with the first site for development identified as the Carfax site (Gladstone Street Carpark and surrounding landholdings).</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>No</p>

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

[Proposed Modification](#) agreed with the HIOW ICB regarding addition of wording in criterion x of Policy W8.

Local Plan Reference or document	Policy W9 Bar End Depot	
Total Number of Representations received.	10	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	7	2
Sound	5	4
Complies with Duty to Cooperate	7	2
<p><b>Summary of Representations</b></p> <p>Comments were made that as the Bar End area had been identified as a ‘Opportunity area’ in the Local Plan there was the need to adopt a more comprehensive approach/planning framework for this area. This should be linked to the Winchester Movement Strategy and the need for better integration with surrounding areas and transport policies.</p> <p>Infrastructure and facilities in the local area are considered to be in need of improvement especially in terms of active travel routes for cycling and walking. With regard to sustainability, while there is support for policies enhancing views and relationships with the South Downs National Park, the 10% Biodiversity Net gain is considered to be insufficient to support the promotion of local food and healthy lifestyles.</p> <p>Comments were made that the plans for the redevelopment of the site should include local amenities (shops and facilities) for the benefit of local residents and the fact that there is no detail in the Local Plan on the mechanism for the delivery on this housing on this site.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BQT-K/1/W9</p> <p>ANON-AQTS-3BJS-B/1/W9</p> <p>ANON-AQTS-3BSY-T/64/W9</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/19/W9</b></p> <p><b>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/10/W9</b></p> <p>ANON-AQTS-3299-G/13/W9</p> <p>ANON-AQTS-3B8M-K/11/W9</p> <p>BHLF-AQTS-3264-8/3/W9</p> <p>BHLF-AQTS-32YQ-8/4/W9</p> <p><b>BHLF-AQTS-328R-8 - Hampshire County Council/17/W9</b></p>		
<p><b>Main issues raised in representations received in regulation 19 consultation.</b></p> <ul style="list-style-type: none"> <li>• Need to adopt a more comprehensive approach/planning framework for this area that should be linked to the Winchester Movement Strategy;</li> <li>• Active travel routes for cycling and walking need to be improved;</li> <li>• The plans for the development of this site should include local amenities (shops and facilities) for the benefit of the immediate area; and</li> </ul>		

- No detail in the Local Plan on the mechanism for the delivery on this housing on this site.

<b>Policy/Evidence base document</b>	W9
<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/13/W9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.



<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>	W9
<b>Name of respondent (or client)</b>	James Day
<b>Personal reference number</b>	ANON-AQTS-3BJS-B
<b>Full reference number</b>	ANON-AQTS-3BJS-B/1/W9
<b>Legally compliant?</b>	No
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	My comments relate to BNG for the Bar End Depot site. It is expected that in its current state, the site will have a low BGN benchmark and a 10% gain can be provided on site through any new development proposal that comes forward together a robust landscape 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 may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	W9
<b>Name of respondent (or client)</b>	Judith Martin
<b>Personal reference number</b>	BHLF-AQTS-3264-8
<b>Full reference number</b>	BHLF-AQTS-3264-8/3/W9
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Next, if not numerically, there is W9, Bar End Depot. This became available for development when the new leisure centre was opened at Bar End about two years ago, but it was known to be a future development site for far longer. My reason for mentioning it here is to do with the section on Living Well etc,: '5.5 Community engagement is also integral to the design process as it leads to a better informed scheme which identifies and addresses local issues.' I can't count how many times the community has been consulted on this particular site but they have been routinely ignored. There is talk in Reg. 19 of local food, healthy lifestyles etc. The community behind Bar End is desperate for local shops, community facilities and opportunities, all detailed in the Highcliffe Community Plan of 2017, but what is proposed is housing with care facilities (a large development of that nature opened only a few years ago further into town on the same road) and a convenience store, which is a type known for the least healthy offer generally combined with high prices. W9 makes a mockery of community involvement.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove W5 and W10, replace the text of W9 with the 2017 Highcliffe Community Plan, and make sure W3 is developed with social housing and not left at the mercy of developers.
<b>What is your suggested wording or text for the policy?</b>	This is not my job, to reword the Winchester Local Plan. My requests for change are as above.
<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>	Yes <a href="#">Form (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>	W9
<b>Name of respondent (or client)</b>	Liz Kessler
<b>Personal reference number</b>	BHLF-AQTS-32YQ-8
<b>Full reference number</b>	BHLF-AQTS-32YQ-8/4/W9
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy W9 Bar End</p> <p>This site was identified as part of the area identified and an 'opportunity area' (P89 of this document) but no work has taken place to explore this area in greater detail, and its potential which is significant in many ways, for a number of uses. The single site approach mitigates against this - the area needs a plan not just this site seen in isolation. Section vii needs to link with wider area, the Movement Strategy and other HCC transport policies. Cycle and pedestrian routes were not adequately planned or delivered in this respect when the Leisure Centre was built. This Policy needs to be strengthened in the context of an area plan and responding to the 'opportunity area'.</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.</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>	W9
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/19/W9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The ICB supports the current policy statements.
<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)</a>

<b>Policy/Evidence base document</b>	W9
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/17/W9
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	The predicted number of children forecast to be generated from this development are unlikely to have a significant impact on the local primary or secondary schools.
<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)</a>



<b>Policy/Evidence base document</b>	W9
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/11/W9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	It does not sufficiently support policy CN1,
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The plan would be positively prepared if it were to reserve parts of development sites for parts of through active travel corridors. Sub policy vii should include the requirement to create a cycling and walking route across the site from Welland Road to the Leisure Centre, as the first stage in a through active travel route from Winnall to the Leisure Centre.
<b>What is your suggested wording or text for the policy?</b>	The plan would be positively prepared if it were to reserve parts of development sites for parts of through active travel corridors. Sub policy vii should include the requirement to create a cycling and walking route across the site from Welland Road to the Leisure Centre, as the first stage in a through active travel route from Winnall to the Leisure Centre.
<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>	W9
<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/64/W9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W9
<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)/10/W9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
<b>What is your suggested wording or text for the policy?</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.

<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="#">Email (Commenting on NE8)</a> <a href="#">Letter (Commenting on policies)</a> <a href="#">Email correspondence (Re policy NE8)</a>

<b>Policy/Evidence base document</b>	W9
<b>Name of respondent (or client)</b>	Winchester City Council
<b>Personal reference number</b>	ANON-AQTS-3BQT-K
<b>Full reference number</b>	ANON-AQTS-3BQT-K/1/W9
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The City Council has invited bids from the market for mixed use development of this site. A preferred bidder has been selected and is recommended for Cabinet approval on 15th October 2024. A link to the Cabinet paper will be available.
<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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modification](#) as a result of incorrectly omitting a criterion from Policy W9 in the Regulation 19 Local Plan.

[Proposed Modification to Local Plan policies map](#) is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps

Local Plan Reference or document	Policy W10 Former River Park Leisure Centre Site		
Total Number of Representations received.	14		
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>	
Legally Compliant	8	5	
Sound	4	9	
Complies with Duty to Cooperate	7	6	
<p><b>Summary of Representations</b></p> <p>There is the need for a comprehensive plan for the site which outlines the areas potential that includes a detailed delivery timescale. As the area is at risk from flooding this needs careful planning in order to ensure that any proposals for the site do not exacerbate flood risk.</p> <p>There is the need to retain the site for public recreation/use and to preserve open spaces for sport and leisure activities.</p> <p>Concerns were expressed that the proper process have not been followed before the site can be redeveloped as there is a restrictive covenant/trust on the site. As no agreement has been reached with the University of Southampton, this indicates that there is no interest in this site. The council should investigate converting the existing building to another use, the site should be used for ecological benefits/nature-based solutions or for sporting facilities such as netball, basketball provided it is supported by adequate car parking.</p> <p>Comments were made that policy is not addressing the cultural and educational needs. Wastewater capacity in the area is limited and this would need to be assessed in order to ensure that it does not place a burden on the sewerage infrastructure.</p>			
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BR1-H/1/W10</p> <p>ANON-AQTS-3BSY-T/26/W10</p> <p><b>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/5/W10</b></p> <p>ANON-AQTS-3299-G/5/W10</p> <p><b>ANON-AQTS-32UK-X - Environment Agency/8/W10</b></p> <p>ANON-AQTS-32N2-X/1/W10</p> <p><b>ANON-AQTS-327U-A - Southern Water/13/W10</b></p> <p>ANON-AQTS-32MJ-N/1/W10</p> <p>ANON-AQTS-32ZS-B/3/W10</p> <p>ANON-AQTS-32H7-W/1/W10</p> <p>ANON-AQTS-32HM-K/1/W10</p> <p>BHLF-AQTS-3264-8/1/W10</p>			

BHLF-AQTS-32YQ-8/1/W10

BHLF-AQTS-3284-A/6/W10

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

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



<b>Policy/Evidence base document</b>	W10
<b>Name of respondent (or client)</b>	Andrew Craig
<b>Personal reference number</b>	ANON-AQTS-32ZS-B
<b>Full reference number</b>	ANON-AQTS-32ZS-B/3/W10
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>With a clearly identified existing shortfall in the required land area for sporting facilities in the central wards of Winchester city, strategic consideration should be given to the re-purposing and retention of the River Park leisure centre grounds for ongoing sporting use. The proposed policy W10 for the former leisure centre at River Park site is not sound as it does not take account of the evidence base prepared for the Local Plan, including specifically the Open Space Assessment 2022.</p> <p>The Open Space Assessment 2022 documents that the Winchester Town area has a large deficit of sports grounds, parks, and recreation grounds, currently identified as 14.2 hectares in the five central Winchester city wards alone. This central Winchester city area is perfectly located to continue to provide suitable sporting provision for the population of Winchester. The land area should have been designated and included within the LGS assessment and retained for future use, and to address at least some of the identified open space shortfall in the city area. Although the replacement sport and leisure centre at Bar End is good, it was built on the existing Garrison sports field (reducing the availability of sports pitches), and therefore the retention of the land area at River Park to provide much needed sporting resource would provide some balance. The River Park location would be well suited to the building of a replacement sports hall of a size capable of providing internal netball, basketball, and indoor hockey facilities (which the current leisure centre lacks), as well as facilities for dance studios and gymnastics clubs. The replacement MUGA pitch (the original built over to provide the skate park) needs to be re-instated.</p> <p>Critically, this area also has a sensible car parking allocation that would be required for ongoing use and access for users and visiting sports teams to both the centre and the surrounding sports fields, and it is essential all of the parking resource is retained for the future.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This site should be considered for registration under the open spaces register, and as such retained for ongoing use under the strategic for central sporting and leisure facility needs, as it would help to address the pre-identified shortfall of sport grounds and facilities within the central Winchester.

<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Add: Priority should be given to the retention of the site for sporting and leisure resources based on the consultative feedback of the community.</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>	W10
<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/6/W10
<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. Again, fails to reference the city LCWIP or the need for suitable cycling, walking and wheeling routes connecting the area. This area is currently a weak link in several potential active travel routes and any development should be required to resolve that.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Refer to LCWIP.
<b>What is your suggested wording or text for the policy?</b>	New para xii: "xii: The proposals must enable public active travel links to and through the site as outlines in the Winchester City LCWIP and Winchester Movement Strategy."
<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)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W10
<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/8/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	There is Flood Zone 3b within the site boundary according to Winchester District Council's Level 2 Strategic Flood Risk Assessment (July 2024). We would encourage that a detailed site-specific Flood Risk Assessment (FRA) demonstrates that there will be no inappropriate development within Flood Zone 3b in accordance with Table 2 of the Planning Practice Guidance for Flood risk and coastal change. Ideally, this would be stated within the policy (we suggest within point v.).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There is Flood Zone 3b within the site boundary according to Winchester District Council's Level 2 Strategic Flood Risk Assessment (July 2024). We would encourage that a detailed site-specific Flood Risk Assessment (FRA) demonstrates that there will be no inappropriate development within Flood Zone 3b in accordance with Table 2 of the Planning Practice Guidance for Flood risk and coastal change. Ideally, this would be stated within the policy (we suggest within point v.).
<b>What is your suggested wording or text for the policy?</b>	Wording to be added to point v.. "no inappropriate development shall take place within Flood Zone 3b (functional floodplain)"
<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>	W10
<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/5/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.
<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>	W10
<b>Name of respondent (or client)</b>	Judith Martin
<b>Personal reference number</b>	BHLF-AQTS-3264-8
<b>Full reference number</b>	BHLF-AQTS-3264-8/1/W10
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>W10, the former River Park Leisure Centre Site. This is allocated for Learning and non-Residential Institutional use on the basis of wishful thinking. There is no evidence that the University of Southampton ever wanted the site in the first place - in fact Freedom of Information requests show that it was the council that approached the university some time in 2019, and the university initially declined. Subsequent Fols indicate that no agreement has ever been signed, despite the WCC plan being launched very nearly three years ago.</p> <p>The Heads of Terms for the proposed agreement, published by WCC for the cabinet meeting of 21st November 2021 (CAB33324), make it plain that the granting of the lease is contingent upon 'planning permission for tertiary education buildings on the RPLC site is secured within 5 years.' Some of the language in W10 gives the impression that there is a plan, and that permission has been given: " ix. The proposals are designed to complement and enhance the appearance of the River Park Recreation Ground and provides a suitable and attractive gateway into the City; x. The proposals are designed to be permeable, that includes publicly accessible performance/events space that benefits the City;" There are no proposals. W10 states at 12.108: "There is an opportunity as part of the redevelopment of this site to enhance the city's cultural offer in an area of considerable historic importance." Winchester can barely look after the cultural offer it has. The Hampshire Cultural Trust, who say "we manage and support visitor attractions, museums, art galleries and arts centres across Hampshire that were previously operated by Hampshire County Council and Winchester City Council" has been making redundancies, the county reference library at what is now the ARC is a shadow of its former self, assets that used to be free are now charged for (which is highly likely to result in reduced footfall), long-held and convincingly funded plans for a multi-use music centre have come to nothing - 14 years of austerity (and little government love for culture even before that) have meant that the sector is barely surviving. HCT requires partnership funding from the local authorities; it has announced the closure between autumn 2024 and 2026 of five venues across the county. Relying on Southampton University, whose own Nuffield theatre on campus went under during the pandemic, while Nuffield City had to be rescued, seems unwise. The offer of unspecified cultural goodies is a very shaky basis on which to put the site into the plan.</p>



	<p>Far better for cultural provision would be to reuse and adapt existing buildings. This is acknowledged in 10.60, Town Centres Strategies and Hierarchy: 'In consideration of recent social, economic and legislative changes, town centres will need to change and adapt with retail development being supported by a much wider range of uses and activities, such as green space, leisure, arts and culture and health and social care services combined with housing to create a space based on social and community interactions.' Turgid plan-speak, perhaps, but opportunities for local bodies and individuals to create art of various kinds in existing repurposed buildings should be encouraged, as happened about 30 years ago with the Colour Factory at River Park.</p> <p>Not only has the financial situation changed since it was first proposed to decommission the old River Park Leisure Centre; so has the environmental situation. Much is made of proximity to the South Downs National Park and Winnall Moors, but increasingly often flooding means Winnall Moors is closed off. 12.105 says 'Due to the proximity of the site to the River Itchen, it is located within a flood risk area and the groundwater levels are less than a metre below the surface which are important considerations that would need to be taken into account as part of the redevelopment of the site.' The site should be returned to what it was, i.e. water meadows, or a green sponge, rather than having more, taller, buildings.</p> <p>The Heart of Reeds in Lewes was commissioned by the local wildlife trust to encourage biodiversity, in which it has succeeded triumphantly. In addition it helps manage flood risk. This is the sort of imaginative solution that could be provided at River Park. And as it was created by a noted artist, Chris Drury, it could also be said to fulfil the cultural commitment, such as it is. Then there is the scandal of the water companies and the dumping of sewage. The Itchen is a precious and highly protected river. The permission given by WCC to the football club at River Park to replace real turf with plastic will further endanger water quality and biodiversity, and increase run-off. The existing building has minimal foundations and only the engine room is even half below ground. (The plans from the 1970s are in the Hampshire Archives.) The promised demolition will cause some disturbance but the subsequent building of a far larger and taller structure would cause much more. To reiterate, W10 is unsound and should be dropped in favour of the environment and biodiversity.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Remove W5 and W10, replace the text of W9 with the 2017 Highcliffe Community Plan, and make sure W3 is developed with social housing and not left at the mercy of developers.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>This is not my job, to reword the Winchester Local Plan. My requests for change are as above.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	

<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 policies)</a>

<b>Policy/Evidence base document</b>	W10
<b>Name of respondent (or client)</b>	Liz Kessler
<b>Personal reference number</b>	BHLF-AQTS-32YQ-8
<b>Full reference number</b>	BHLF-AQTS-32YQ-8/1/W10
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy W10 River Park</p> <p>As with the other sites referred to above consideration of this site separate from its overall context is unsatisfactory and perpetuates poor planning. The site is adjacent to the River Park Recreation Ground and together with the adjacent parking area and play area this is a potentially stunning area of the city, close to the Central Winchester Regeneration area - it needs an overarching plan, especially as the Recreation Ground is in need of significant regeneration, it is poorly planned and requires much improvement, while the play and skate park are poorly sited. This policy flails to recognise the area's potential, and consideration of the site alone perpetuates the unsatisfactory piecemeal approach to the area.</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.</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>	W10
<b>Name of respondent (or client)</b>	Lois Gravely
<b>Personal reference number</b>	ANON-AQTS-3BR1-H
<b>Full reference number</b>	ANON-AQTS-3BR1-H/1/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I believe the area should be used for the public benefit which I believe is covered above. Also you mention the need to consider the nearby nature reserve which is of immense importance. All the area around here is subject to flooding so nature restoration should play a key role.
<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>	W10
<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/26/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W10
<b>Name of respondent (or client)</b>	Rosemary Burns
<b>Personal reference number</b>	ANON-AQTS-32MJ-N
<b>Full reference number</b>	ANON-AQTS-32MJ-N/1/W10
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	See Friends of River Park's response to Reg 19 Local Plan sent by email to <a href="mailto:planningpolicy@winchester.gov.uk">planningpolicy@winchester.gov.uk</a>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Local Plan is not legally compliant and is unsound because of the points expressed in our submissions. To overcome this failure and to ensure that the Plan is sound, the allocation W10 should be removed from the Plan.
<b>What is your suggested wording or text for the policy?</b>	Please see our response. Policy W10 should be removed from the Plan.
<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 W10)</a> <a href="#">Form (W10 - response detailed in letter)</a>

<b>Policy/Evidence base document</b>	W10
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/13/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>We welcome the inclusion of the criterion below for Policy W10 River Park: Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p> <p>Supporting Text: This is because our initial assessment of the site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>New Recommendation: Southern Water is the statutory water and wastewater undertaker for the Winchester Town area. In accordance with this, we have undertaken an assessment of the existing capacity of our infrastructure and its ability to meet a possible forecast demand for this proposal, based on a calculated flow rate. The assessment reveals that local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development of the site. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of wastewater infrastructure. Proposals for this site could generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement would be provided through the New Infrastructure charge, but Southern Water would need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless any requisite works are implemented in advance of occupation. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that</p>



	development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment, in line with paragraph 180(e) of the revised National Planning Policy Framework (NPPF) (2023). Accordingly, we propose the following additional criterion for Policy W10: Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We propose the following additional criterion for Policy W10: Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
<b>What is your suggested wording or text for the policy?</b>	Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
<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 (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	W10
<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)/5/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.
<b>What is your suggested wording or text for the policy?</b>	We support the criteria in Policies W10(VII), CC2(VIII), and CC3(II and VIII) about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the setting of the South Downs National Park is included in the above policies, and that similar criteria are included in Policies W6, W9, BW3, WK1, WK5, WK6, and OT01 – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy. In addition, we also request that the boundary of South Downs National Park is added to the inset maps, site plans and wider context plans for Policies W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the South Downs National Park.

<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="#">Email (Commenting on NE8)</a> <a href="#">Letter (Commenting on policies)</a> <a href="#">Email correspondence (Re policy NE8)</a>

<b>Policy/Evidence base document</b>	W10
<b>Name of respondent (or client)</b>	W Sclater
<b>Personal reference number</b>	ANON-AQTS-32H7-W
<b>Full reference number</b>	ANON-AQTS-32H7-W/1/W10
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>I am writing to you as a resident of The Hyde area in relation to draft policy W10. This proposed policy W10 is not a legally compliant or sound W10 policy. The council cannot deliver it and it puts the council in breach of covenants and a statutory trust. The Council acknowledge in a cabinet report CAB3190 in 2019 that there are covenants and a statutory trust on the site and which as such council report CAB3190 states in its 3.1 " Consideration of future land uses for both the building and surrounding site at the RPLC [ie River Park Leisure Centre] site are subject to historic restrictions on the Land Registry title, which relate back to the original site purchase. Subsequently the land is currently held on a statutory trust as a public park and recreation ground for the City and subject to a restrictive covenant. 3.2 in that CAB 3190 report in 2019 of the Council states "the implications of the restrictive legal covenant and holding the land as a statutory trust on the site means that: (a) the building and the land may only be currently used for recreational and open space and associated uses  (b) residential use is not permitted without discharge of the restrictive covenant by the Lands Tribunal , even following appropriation  (c) additional options for the use of the land and buildings become available following a valid appropriation of the land, being uses which are under the Council responsibilities</p> <p>....</p> <p>3.3 Appropriation of the whole or part of the site from open space to planning purposes is a statutory process which , in this case, requires public consultation, evidence that the land no longer required for the purpose to which it is held, consideration of any comments received and not able to be pursued if it would lead to a breach of the restrictive covenant"</p> <p>and 3.4 acknowledges that the covenant could only be got round with agreement of the parties who benefited from it or in a Lands Tribunal application (now known as a Property Chamber application)_ it was shown that the restriction is obsolete or would not adversely affect (and this should read it is shown that the covenant is not there to protect loss of amenity).</p> <p>Paragraph 3.2 (d) in that report states too that the Council could not sell or grant a lease unless there had first been an appropriation and the disposal of open space under section 123 of the Local Government Act 1972 procedures are followed and best consideration is obtained.</p>

In the Council Cabinet report from 9 March 2022 and with reference CAB3342 it also stated in its paragraph 4.19 that with the University of Southampton use there would not be access other than for tertiary accommodation and ancillary purposes for the first 35 years. This is a complete breach of the statutory trust and restrictive covenant referred to above.

Paragraph 4.28 in that March 2022 Council Cabinet report with reference CAB3342 also states that "The appropriation decision would be informed by a report, based on worked out development proposals, addressing the central issue under S.122 (1) Local Government Act 1972 or whether the relevant part of the Site "is no longer required for the purpose for which it is held". This is a comparative test that involves consideration of whether there is a greater public need for development for the proposed new use than the current use". Paragraph 4.29 in that report states that because the site includes open space any such appropriation needs to be preceded by an advert in a local newspaper for 2 consecutive weeks and there needs to be consideration of any objections to the proposed appropriation (and as confirmed by s122 (2A) of the Local Government Act 1972.)

There has not been any such appropriation and therefore in the way referred to in paragraphs 4.28 and 4.29 in the Council March 2022 Report CAB3342 or in the Council's 2019 Report CAB3190 or at all. The use for this site remains as the Council says in their 2019 Report CAB3190 in its paragraph 3.2 as recreational and open space. That does not change unless and until there has been the appropriation which requires full consultation and including a full consideration (and including through a report and full consultation) of whether there is a greater public need for development for the proposed new use than the current use. Furthermore the council has not ended up entering into an option agreement with the University of Southampton. There has been notification from on high that the University of Southampton is not proceeding. If the Council had nonetheless entered into any agreement with the University of Southampton the 35 years of no public access point references in paragraph 4.19 in the Council March 2022 Report CAB3342 illustrates that being in breach of the above referred restrictive covenant and statutory trust.

The Council in fact not proceeding also further illustrates the total lack of need for the proposed Policy W10 and its proposed change of use for the site. Further to the above and including not least the above referred parts of Council Cabinet 2019 and 2022 reports there can be no change of use (or facilitation of change of use) of the site (and including within any Policy including the proposed Policy W10) until there has been appropriation (which there has not been) and the covenants have been released (which there have not been and it is not seen how any covenants release could be achieved).

This draft policy W10 is not sound. It is not justified taking into account reasonable alternatives, It is not effective (and so in turn not deliverable). It is not positively prepared (ie it does not meet the area's objectively assessed needs). It is not consistent with national policy (ie is not enabling delivery of sustainable

	development and is in breach of National planning policies such as those set out in paragraphs 96 to 107 as to the protection of open space and recreation areas). It breaches the statutory trust arising from a 1902 conveyance to use the site for recreation and open space and the associated covenant in that 1902 conveyance. It is a breach of existing Local plan policies to protect open space and recreation areas in Winchester. The loss of car park and community buildings arising from for example an education use of this site will be a breach of both those existing Local Plan policies and the draft Policy NE3 presumption against the loss of open space and recreation area/facilities.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	remove the draft Policy W10 and not least its reference in its first paragraph to education , display of art work (not for sale or hire) , museum public worship or religious instruction, law court (ie as not compatible with the restrictive covenant and statutory trust) ; and, without prejudice to the contention that the draft policy W10 was removed, to the extent that it was found that it was reasonable that there was some form of Policy W10 insert reference to a proposed development needing to show it is not in breach of the statutory trust and restrictive covenant for recreation and open space use that is set out in the 1902 conveyance
<b>What is your suggested wording or text for the policy?</b>	remove the draft Policy W10 and not least its reference in its first paragraph to education , display of art work (not for sale or hire) , museum public worship or religious instruction, law court (ie as not compatible with the restrictive covenant and statutory trust) ; and, without prejudice to the contention that the draft policy W10 was removed, to the extent that it was found that it was reasonable that there was some form of Policy W10 insert reference to a proposed development needing to show it is not in breach of the statutory trust and restrictive covenant for recreation and open space use that is set out in the 1902 conveyance
<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>	W10
<b>Name of respondent (or client)</b>	W Sclater
<b>Personal reference number</b>	ANON-AQTS-32HM-K
<b>Full reference number</b>	ANON-AQTS-32HM-K/1/W10
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>I am writing to you as a resident of The Hyde area in relation to draft policy W10.</p> <p>This proposed policy W10 is not a legally compliant or sound W10 policy</p> <p>The council cannot deliver it and it puts the council in breach of covenants and a statutory trust.</p> <p>The Council acknowledge in a cabinet report CAB3190 in 2019 that there are covenants and a statutory trust on the site and which as such council report CAB3190 states in its 3.1 " Consideration of future land uses for both the building and surrounding site at the RPLC [ie River Park Leisure Centre] site are subject to historic restrictions on the Land Registry title, which relate back to the original site purchase. Subsequently the land is currently held on a statutory trust as a public park and recreation ground for the City and subject to a restrictive covenant. 3.2 in that CAB 3190 report in 2019 of the Council states "the implications of the restrictive legal covenant and holding the land as a statutory trust on the site means that: (a) the building and the land may only be currently used for recreational and open space and associated uses</p> <p>(b) residential use is not permitted without discharge of the restrictive covenant by the Lands Tribunal , even following appropriation</p> <p>(c) additional options for the use of the land and buildings become available following a valid appropriation of the land, being uses which are under the Council responsibilities</p> <p>....</p> <p>3.3 Appropriation of the whole or part of the site from open space to planning purposes is a statutory process which , in this case, requires public consultation, evidence that the land no longer required for the purpose to which it is held, consideration of any comments received and not able to be pursued if it would lead to a breach of the restrictive covenant" and 3.4 acknowledges that the covenant could only be got round with agreement of the parties who benefited from it or in a Lands Tribunal application (now known as a Property Chamber application)_ it was shown that the restriction is obsolete or would not adversely affect (and this should read it is shown that the covenant is not there to protect loss of amenity).</p> <p>Paragraph 3.2 (d) in that report states too that the Council could not sell or grant a lease unless there had first been an appropriation and the disposal of open space under section 123 of the Local Government Act 1972 procedures are followed and best consideration is obtained.</p>

In the Council Cabinet report from 9 March 2022 and with reference CAB3342 it also stated in its paragraph 4.19 that with the University of Southampton use there would not be access other than for tertiary accommodation and ancillary purposes for the first 35 years. This is a complete breach of the statutory trust and restrictive covenant referred to above.

Paragraph 4.28 in that March 2022 Council Cabinet report with reference CAB3342 also states that "The appropriation decision would be informed by a report, based on worked out development proposals, addressing the central issue under S.122 (1) Local Government Act 1972 or whether the relevant part of the Site "is no longer required for the purpose for which it is held". This is a comparative test that involves consideration of whether there is a greater public need for development for the proposed new use than the current use". Paragraph 4.29 in that report states that because the site includes open space any such appropriation needs to be preceded by an advert in a local newspaper for 2 consecutive weeks and there needs to be consideration of any objections to the proposed appropriation (and as confirmed by s122 (2A) of the Local Government Act 1972.

There has not been any such appropriation and therefore in the way referred to in paragraphs 4.28 and 4.29 in the Council March 2022 Report CAB3342 or in the Council's 2019 Report CAB3190 or at all. The use for this site remains as the Council says in their 2019 Report CAB3190 in its paragraph 3.2 as recreational and open space. That does not change unless and until there has been the appropriation which requires full consultation and including a full consideration (and including through a report and full consultation) of whether there is a greater public need for development for the proposed new use than the current use. Furthermore The council has not ended up entering into an option agreement with the University of Southampton. There has been notification from on high that the University of Southampton is not proceeding. If the Council had nonetheless entered into any agreement with the University of Southampton the 35 years of no public access point references in paragraph 4.19 in the Council March 2022 Report CAB3342 illustrates that being in breach of the above referred restrictive covenant and statutory trust. The Council in fact not proceeding also further illustrates the total lack of need for the proposed Policy W10 and its proposed change of use for the site. Further to the above and including not least the above referred parts of Council Cabinet 2019 and 2022 reports there can be no change of use (or facilitation of change of use) of the site (and including within any Policy including the proposed Policy W10) until there has been appropriation (which there has not been) and the covenants have been released (which there have not been and it is not seen how any covenants release could be achieved).

This draft policy W10 is not sound. It is not justified taking into account reasonable alternatives, It is not effective (and so in turn not deliverable). It is not positively prepared (ie it does not meet the area's objectively assessed needs). It is not consistent with national policy (ie is not enabling delivery of sustainable development and is in breach of National planning policies such as those set out in paragraphs 96 to 107 as



	to the protection of open space and recreation areas). It breaches the statutory trust arising from a 1902 conveyance to use the site for recreation and open space and the associated covenant in that 1902 conveyance. It is a breach of existing Local plan policies to protect open space and recreation areas in Winchester. The loss of car park and community buildings arising from for example an education use of this site will be a breach of both those existing Local Plan policies and the draft Policy NE3 presumption against the loss of open space and recreation area/facilities.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	remove the draft Policy W10 and not least its reference in its first paragraph education , display of art work (not for sale or hire) , museum public worship or religious instruction, law court (ie as not compatible with the restrictive covenant and statutory trust) ; and, without prejudice to the contention that the draft policy W10 was removed, to the extent that it was found that it was reasonable that there was some form of Policy W10 insert reference to a proposed development needing to show it is not in breach of the statutory trust and restrictive covenant for recreation and open space use that is set out in the 1902 conveyance.
<b>What is your suggested wording or text for the policy?</b>	remove the draft Policy W10 and not least its reference in its first paragraph education , display of art work (not for sale or hire) , museum public worship or religious instruction, law court (ie as not compatible with the restrictive covenant and statutory trust) ; and, without prejudice to the contention that the draft policy W10 was removed, to the extent that it was found that it was reasonable that there was some form of Policy W10 insert reference to a proposed development needing to show it is not in breach of the statutory trust and restrictive covenant for recreation and open space use that is set out in the 1902 conveyance.
<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>	W10
<b>Name of respondent (or client)</b>	Winchester City Council
<b>Personal reference number</b>	ANON-AQTS-32N2-X
<b>Full reference number</b>	ANON-AQTS-32N2-X/1/W10
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The Council has a number of regeneration projects underway at different stages of the development process as described below. Some of the projects have benefitted from technical studies that have not yet been shared with the Local Planning Authority or statutory consultees. These could impact the wording of the relevant policies in the Regulation 19 Local Plan. We are keen to support the Local Plan process by demonstrating the Council's commitment to delivering these projects and are happy to attend the inquiry if it helps to demonstrate where these projects are in delivery.</p> <p>The Council is the landowner of this site allocated for development within the Local Plan. On 9 March 2022, Cabinet agreed to dispose of a long-lease of the former leisure centre to the University of Southampton (UoS) (CAB3342): Agenda for Cabinet on Wednesday, 9th March, 2022, 9.30 am - Winchester City Council The Council is in on-going discussions with the UoS.</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>	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.*

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modification](#) agreed with Historic England in relation to paragraph 12.106. Proposed Modification agreed with the Environment Agency in relation to criterion v of Policy W10.

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

[Proposed Modification to Local Plan policies map](#) is included in the Proposed Modifications to include the boundary of the South Downs National Park in the allocation and inset maps

<b>Local Plan Reference or document</b>	Policy W11 University of Winchester / Royal Hampshire County Hospital	
<b>Total Number of Representations received.</b>	8	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	7	0
<b>Sound</b>	4	3
<b>Complies with Duty to Cooperate</b>	6	1
<p><b>Summary of Representations</b></p> <p>The site’s potential for new development, including housing, was supported but this must ensure that essential hospital services are preserved. Any plans for the site must be undertaken in collaboration with the NHS Trust who would be supportive of a healthcare-specific masterplan in order to secure the long-term investment and improvements to the site and the unique challenges and opportunities of the site. Any future development on the site need to consider on-site energy generation.</p> <p>Given the proximity of the site, any plans need incorporate enhancements to active travel pedestrian and cycling facilities and encourage a better modal shift by providing a dedicated cycle path on Romsey Road. This is considered to be in line with the Local Cycling and Walking Infrastructure Plan (LCWIP). These improvements are considered to be essential for enhancing the connectivity of the site given that this is such an important employment area.</p> <p>Any plans for the redevelopment of the site need to ensure that they take into account and maintain access to the sewerage infrastructure and include a sewerage network capacity analysis.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BN4-G/6/W11</p> <p>ANON-AQTS-3BSY-T/75/W11</p> <p>ANON-AQTS-3299-G/15/W11</p> <p><b>ANON-AQTS-327U-A - Southern Water/30/W11</b></p> <p><b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/18/W11</b></p> <p>ANON-AQTS-3B8M-K/14/W11</p> <p><b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/18/W11</b></p> <p>BHLF-AQTS-3284-A/15/W11</p>		
<p><b>Main issues raised in representations received in regulation 19 consultation.</b></p> <ul style="list-style-type: none"> <li>• Essential hospital services are preserved and any plans for redevelopment undertaken in collaboration with the NHS Trust;</li> <li>• The need to consider on-site energy generation;</li> <li>• Improvements and enhancement to the active travel routes and encourage a better modal shift; and</li> </ul>		

- Any redevelopment needs to undertake a sewerage capacity network assessment.

<b>Policy/Evidence base document</b>	W11
<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/15/W11
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Fails on being effective and consistent with national policy. Though para iv mentions cycle and pedestrian access it fails to reference the city LCWIP. As a major employment area, improving the cycling network into and around this site should be a requirement.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Add reference to LCWIP.
<b>What is your suggested wording or text for the policy?</b>	"iv. Use existing access points and make improvements to these as necessary, particularly to improve public cycle and pedestrian access both to and through the site, in accordance with the Winchester City LCWIP."
<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)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	W11
<b>Name of respondent (or client)</b>	David Alexander
<b>Personal reference number</b>	ANON-AQTS-3BN4-G
<b>Full reference number</b>	ANON-AQTS-3BN4-G/6/W11
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Current hospital is a mess of buildings from various eras. The oldest buildings do some aspects of merit but I would not object to rebuilding the main building into something more efficient. The site is sufficiently large to be able to sell some of the land for private housing and still have plenty to create new, more efficient hospital buildings. Do not stop development for the sake of a couple of trees with TPO on them - there are millions of trees in Hampshire. Recall, if we did not cut down some substantial and mature oak trees we would have no roof on the cathedral!
<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>	No



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

<b>Policy/Evidence base document</b>	W11
<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/15/W11
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>There are a series of existing and new strategic allocations made on the edge of the County Town of Winchester. Whilst we do not necessarily object to them in principle, there is no evidence in this local plan to explain when they are expected to come forwards and at what rate or why that contribution is justified. It is very important for the local plan to be based on a series of realistic assumptions about the delivery of allocated sites to ensure that there is a continual ability to demonstrate a five-year housing land supply (5YHLS) over the plan period, and to meet its housing requirement (NPPF paragraph 23 and 67). The NPPF plainly requires at paragraph 75 “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”</p> <p>Whilst at Appendix 5 of the Housing Topic Paper there are two tables showing the 5YHLS position across the plan period using both the Sedgefield and Liverpool methods to incorporating over/under supply into the calculation, it only shows total figures. There is no evidence produced to show how these figures have been calculated, what sites make them up or what sites are assumed to be delivering and how much, in any given year.</p> <p>On this basis, the local plan is not:</p> <ol style="list-style-type: none"> <li>1 Positively prepared – because it fails to evidence a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs</li> <li>2 Justified – because it is seemingly not based on proportionate evidence;</li> <li>3 Effective – because there is no evidence its housing strategy is deliverable over the plan period, nor</li> <li>4 Consistent with national policy – as per the above with NPPF paragraph 23, 67 and 75.</li> </ol>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The publication of a detailed housing trajectory with the assumptions made about the delivery of every individual site in every year of the plan period.

<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>	W11
<b>Name of respondent (or client)</b>	Hampshire Hospitals NHS Foundation Trust
<b>Personal reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/18/W11
<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 Trust continues to welcome the inclusion of a policy specifically covering Royal Hampshire County Hospital. The Trust previously noted that the Regulation 18 Local Plan documents stated that ‘if decisions are made by the Health Authorities which result in land becoming available.....’ It is important to note that all options currently being discussed with the Department continue to see retention of services at RHCH although the scope of these services may change, and the Trust are exploring the potential to produce an updated site masterplan. The Trust are enthusiastic to work collaboratively with WCC in this respect to secure long-term investment in the site. No decision has yet been made and approvals at national level will dictate the extent of system wide investment and if land will become available for alternative uses.</p> <p>The Trust are enthusiastic to collaborate with Winchester City Council to develop a Healthcare and Operational Masterplan. However, the Trust objects to the implied reference within Policy W11 that a (singular) joint masterplan is expected, covering both the Royal Hampshire County Hospital and University of Winchester assets.</p> <p>The Trust propose that a bespoke healthcare masterplan would be more appropriate, considering that there will be differences in funding, delivery pressures, impacts, and mitigations between the Trust and the University. Notwithstanding, the Trust are willing to cooperate with the University to find synergies between bespoke Royal Hampshire County Hospital and University of Winchester masterplans.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The Trust propose that a bespoke healthcare masterplan would be more appropriate than a singular joint masterplan prepared by the Trust and the University.</p> <p>Taking into account the response to Policy CN3, the Trust suggest that Policy W11 make specific provision and allowances for instances where on-site energy generation is not sufficient to power a proposed development.</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>	W11
<b>Name of respondent (or client)</b>	Phil Gagg
<b>Personal reference number</b>	ANON-AQTS-3B8M-K
<b>Full reference number</b>	ANON-AQTS-3B8M-K/14/W11
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Section (iv) on access does not do enough to support policy CN1.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The policy should include encouragement (a) to build in pedestrian and cycling permeability across the site and (b) to provide a route away from but parallel to Romsey Road to encourage modal shift and support policy CN1.
<b>What is your suggested wording or text for the policy?</b>	replace iv with iv. There is an opportunity here to create better sustainable travel infrastructure and introduce good pedestrian and cycling/wheeling permeability across the site. A site of this size should have at least 2 miles each of cycleway and footpath. Good access to the bus stops on Romsey Road the city centre and the station should be included.. Use existing access points and make improvements to these as necessary, particularly to improve cycle and pedestrian access. Vehicular access to development at the University campus will not be permitted from Milnthorpe Lane;
<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>	W11
<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/75/W11
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The plan looks good.
<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>	W11
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/30/W11
<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 welcome the inclusion of the criterion below for Policy W11 University of Winchester:  Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.  Supporting Text:  This is because our initial assessment of this site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</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 allocation has already been</i>	Yes <a href="#">Supporting Document (Commenting on policies)</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>	W11
<b>Name of respondent (or client)</b>	Shirlene Oh
<b>Personal reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
<b>Full reference number</b>	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/18/W11
<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 W11</p> <p>The Trust continues to welcome the inclusion of a policy specifically covering Royal Hampshire County Hospital. The Trust previously noted that the Regulation 18 Local Plan documents stated that ‘if decisions are made by the Health Authorities which result in land becoming available.....’ It is important to note that all options currently being discussed with the Department continue to see retention of services at RHCH although the scope of these services may change, and the Trust are exploring the potential to produce an updated site masterplan. The Trust are enthusiastic to work collaboratively with WCC in this respect to secure long-term investment in the site. No decision has yet been made and approvals at national level will dictate the extent of system wide investment and if land will become available for alternative uses.</p> <p>The Trust are enthusiastic to collaborate with Winchester City Council to develop a Healthcare and Operational Masterplan. However, the Trust objects to the implied reference within Policy W11 that a (singular) joint masterplan is expected, covering both the Royal Hampshire County Hospital and University of Winchester assets. The Trust propose that a bespoke healthcare masterplan would be more appropriate, considering that there will be differences in funding, delivery pressures, impacts, and mitigations between the Trust and the University. Notwithstanding, the Trust are willing to cooperate with the University to find synergies between bespoke Royal Hampshire County Hospital and University of Winchester masterplans. Taking into account the response to Policy CN3, the Trust suggest that Policy W11 make specific provision and allowances for instances where on-site energy generation is not sufficient to power a proposed development.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Taking into account the response to Policy CN3, the Trust suggest that Policy W11 make specific provision and allowances for instances where on-site energy generation is not sufficient to power a proposed development.
<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="#">Letter (Commenting on policies)</a>

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

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

[Proposed Modifications](#) agreed with Historic England regarding the wording of paragraph 12.120.