

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

### South Hampshire Urban Areas

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 SH1 Newlands (West of Waterlooville)	
Total Number of Representations received	7	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	5	0
Sound	4	1
Complies with Duty to Cooperate	4	1
<p><b>Summary of Representations</b></p> <p>The majority of representations support this policy, including of addition of new criteria following the draft Local Plan. Several suggestions are made for small changes to the policy, its explanatory text or maps for clarification, particularly in relation to infrastructure and service provision. These include suggested changes by the site promoter, who confirms its deliverability and that there may be capacity for about 400 additional units (instead of 300 estimated).</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/4/SH1</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/3/SH1</b></p> <p><b>ANON-AQTS-32UK-X - Environment Agency/2/SH1</b></p> <p>ANON-AQTS-3B5G-A/1/SH1</p> <p><b>ANON-AQTS-327U-A - Southern Water/3/SH1</b></p> <p>BHLF-AQTS-3284-A/2/SH1</p> <p><b>BHLF-AQTS-328R-8 - Hampshire County Council/3/SH1</b></p>		
<p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Significant support for policy SH1;</li> <li>• Whether there is a need for clarification and whether the policy includes sufficient detail; and</li> <li>• Whether the estimated capacity of the site should be increased.</li> </ul>		

<b>Policy/Evidence base document</b>	SH1
<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/2/SH1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Fails on being positively prepared, effective and consistent with national policy. Fails to specify any requirement for active travel connections to surrounding settlements apart from a passing mention of Waterlooville centre. No mention of the District LCWIP despite mentions in the supporting text. There is no evidence that links outside the district have been allowed for at all, despite its proximity to the Portsmouth/Cosham/Portchester area where many of the residents of this new development are likely to work.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Refer to District LCWIP, links to all neighbouring settlements, and active travel networks in neighbouring authorities.
<b>What is your suggested wording or text for the policy?</b>	New para ix: “ix. Provide active travel links to all surrounding communities including Denmead and the South Hampshire urban area (Portsmouth, Portsdown, Paulsgrove, Portchester) and make connections to the active travel network defined in the Winchester District LCWIP as well as the LCWIP networks of neighbouring authorities including Portsmouth, Fareham and Havant.”
<b>Do you agree with how the 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 (commenting on policies)</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>	SH1
<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/2/SH1
<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 the inclusion of points vi., vii. & viii. We note that the Level 2 Strategic Flood Risk Assessment (July 2024) specifies that no development is permitted within Flood Zone 3b (functional floodplain).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	No modifications are 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. 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>	SH1
<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/3/SH1
<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>	SH1
<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/3/SH1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>With an additional 300 homes proposed an expansion of the southern primary school would be required as part of this development. Land has been reserved to accommodate an expansion. This is a carried forward site with an additional approximately 300 dwellings to be achieved through intensification within the Winchester District part of the development. The County Council welcome intensification of dwellings in the sections of the development that are within 800 metres walking distance to Waterlooville town centre or within 400 metres walking distance to the STAR bus stops on A3 London Road corridor.</p> <p>The transport implications associated with the intensification of the development proposals and the 300 additional dwellings will be felt on the road network within Havant Borough and as such must be assessed in a revised Transport Assessment. Any impacts on neighbouring authorities will require further discussions and where appropriate additional mitigation measures.</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)</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>	SH1
<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/4/SH1
<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>	SH1
<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/3/SH1
<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 SH1 West of Waterlooville: Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</p> <p>Supporting Text: 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 each site.</p> <p>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.</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).</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="#">Supporting Document (Commenting on policies)</a>

<b>Policy/Evidence base document</b>	SH1
<b>Name of respondent (or client)</b>	West Waterlooville Developments Limited (Grainger PLC)
<b>Personal reference number</b>	ANON-AQTS-3B5G-A
<b>Full reference number</b>	ANON-AQTS-3B5G-A/1/SH1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>West Waterlooville Developments Limited (WWDL) welcomes WCC continuing the strategy of focusing development on large-scale sustainable locations and for recognising the ability of the Berewood Major Development Area (MDA) to continue to provide more homes in the South Hampshire Urban Area by way of intensifying and expanding the scope of the existing development.</p> <p>An updated Delivery Statement has been submitted to Winchester City Council alongside these representations, providing details of the capacity testing carried out to date. The statement confirms the ability for at least an additional 300 dwellings to be delivered beyond the consented 2,550 within the extent of the West Waterlooville (Berewood) strategic allocation. As set out in the Delivery Statement, an uplift of circa 400 units is now considered possible as confirmed by the results of the highways and utilities capacity testing. The supporting text in paragraph 13.11, states that traditional completions on site have averaged around 100 dwellings per annum over the last 10 years and have seen peaks of almost 200 in some years. WWDL wishes to highlight that the delivery of infrastructure across the site has accelerated to accommodate an increased rate of housing delivery. Updated forecasting information indicates that delivery will be in the range of 150 – 180 units a year. An indicative delivery plan has been included within the updated Delivery Statement which demonstrates the ability of the proposed unit numbers to be delivered within the plan period. It is noted that the allocation for Newlands (West of Waterlooville) comprises both the Berewood MDA and the Old Park Farm, as stated in paragraph 13.9 and the reasons for this are clear. As Old Park Farm is now complete, and for clarity, it is requested that the wording of policy 1.39 and the accompanying policy map is amended so it is clear that the reference to an uplift of units within the MDA relates to land within WWDL's ownership (Berewood) only.</p> <p>WWDL broadly agrees with the references to the land use revisions referenced in paragraph 13.10. However, further recognition of the agreement to remove employment from the mixed-use parcels (M1 and M3) should be included within the wording of this paragraph to avoid any ambiguity in the future. As set out in the accompanying Delivery Statement, changes in the economic climate alongside Havant Borough Council's aspirations for the regeneration of Waterlooville Town Centre has resulted in the principle of a reduction in employment/commercial provision on these parcels being agreed. This amendment will not impact the established employment provision within Berewood, known as Proxima Park.</p>

	<p>The map on page 370 shows the current masterplan area. Through conversations between WWDL, Savills, and WCC officers, it has become apparent that the map should be updated to align with the updated land use provisions. This includes a change in the use of land previously allocated as a cemetery and land allocated for the northern school expansion. For both parcels, it has been formally confirmed by the relevant authority that they are not required for the purpose originally intended allowing the sites to be promoted for residential development as an update to policy SH1.</p> <p>WWDL appreciates that the map in its current form has been used in the long-term but requests that the colours are revised to enable improved legibility between the different layers and to avoid confusion.</p> <p>WWDL is broadly supportive of the site-specific requirements proposed for policy SH1. An amendment to point iii is suggested to align with the principle of reducing the mixed-use commercial/employment provision on site. It is anticipated that the mixed commercial and housing areas will be limited to the local centre provision which should be reflected in the wording of the policy.</p> <p>As a general comment, each policy within the draft Local Plan needs to allow for recognition that the delivery of the committed strategic development sites in the South Hampshire Urban Area has been approved under the considerations of previous planning policy, with future application of policies proposed within this Local Plan to be considered for the additional units only.</p> <p>The West of Waterlooville MDA development makes a significant contribution to housing delivery in the District and will continue to do so with four recent land sales which will progress to planning submissions in the next 6 months. The ability of WWDL to deliver additional units on the site will ensure a continued provision of housing supply within the South Hampshire Urban Area.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As set out in the comment above, WWDL requests the following amendments:</p> <ul style="list-style-type: none"> <li>- Amend the wording of paragraph 13.9 and the site allocation map to make clear that the uplift of units is within the Berewood (Grainger owned) area of the MDA.</li> <li>- Include reference to parcels M1 and M3 in paragraph 13.10.</li> <li>- Update site allocation map to reflect land use changes to school expansion land and cemetery.</li> <li>- Amend point iii of the policy wording to limit the provision of mixed use commercial use to the local centre.</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>No, I don't want to take part in a hearing session</p>

**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

[Supporting Document \(Site Delivery Statement - Berewood\)](#)

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

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



Local Plan Reference or document	Policy SH2 North Whiteley	
Total Number of Representations received	13	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	8	2
Sound	6	5
Complies with Duty to Cooperate	8	2
<p><b>Summary of Representations</b></p> <p>The majority of representations support this policy, including of addition of new criteria following the draft Local Plan. There is some objection to the alleged impact on ancient woodland and lack of infrastructure provision, or suggestions that the Plan needs modification so as better to protect or provide these. The site promoter confirms its deliverability and that a planning application for about 90 dwellings will be made shortly (compared to 110 estimated), while seeking clarification of the Plan’s explanatory text and map. One representation suggests there is scope for further expansion to the north of Whiteley (‘omission’ site).</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/91/SH2</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/35/SH2</b></p> <p>ANON-AQTS-32UE-R/6/SH2</p> <p><b>ANON-AQTS-32UK-X - Environment Agency/18/SH2</b></p> <p>ANON-AQTS-32UU-8/9/SH2</p> <p><b>ANON-AQTS-327U-A - Southern Water/37/SH2</b></p> <p>ANON-AQTS-32ZM-5/4/SH2</p> <p>ANON-AQTS-3B8M-K/17/SH2</p> <p><b>BHLF-AQTS-3266-A - Fareham Borough Council/7/SH2</b></p> <p><b>BHLF-AQTS-32YH-Y - Network Rail/7/SH2</b></p> <p><b>BHLF-AQTS-3282-8 - Natural England/15/SH2</b></p> <p>BHLF-AQTS-3284-A/19/SH2</p> <p><b>BHLF-AQTS-328R-8 - Hampshire County Council/32/SH2</b></p>		
<p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Significant support for policy SH2;</li> </ul>		

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

<b>Policy/Evidence base document</b>	SH2
<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/19/SH2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Fails on being positively prepared, effective and consistent with national policy.</p> <p>Fails to specify any requirement for active travel connections to surrounding settlements apart from a passing mention of Waterlooville centre. No mention of the District LCWIP despite mentions in the supporting text. There is no evidence that links outside the district have been allowed for at all, despite its proximity to the Portsmouth/Cosham/Portchester area where many of the residents of this new development are likely to work.</p> <p>Comments as for SH1. In this case the relevant settlements are Botley, Hedge End and Locks Heath and the relevant neighbouring authorities are Eastleigh, Southampton.</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>	<p>New para xi:</p> <p>“xi. Provide active travel links to all surrounding communities including Denmead and the South Hampshire urban area (Botley, Hedge End, Locks Heath) and make connections to the active travel network defined in the Winchester District LCWIP as well as the LCWIP networks of neighbouring authorities including Southampton and Eastleigh.”</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">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.*

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

<b>Policy/Evidence base document</b>	SH2
<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/18/SH2
<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 points vi. to viii.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	No modifications are 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. 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>	SH2
<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/7/SH2
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Network Rail believe the Policy to be sound. The need for a public transport strategy and off site contributions are noted within the Policy and this is supported. Improving access to and around Botley rail station should remain a priority for the allocation.</p> <p>The lack of a specific infrastructure Policy providing an approach towards securing planning obligations for infrastructure improvements is a concern for Network Rail. Developments that require mitigation due to impacts on the rail network should fully fund those mitigations to ensure the development can be supported and growth does not overwhelm the existing infrastructure.</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="#">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>	SH2
<b>Name of respondent (or client)</b>	Crest Nicholson Partnerships and Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32UU-8
<b>Full reference number</b>	ANON-AQTS-32UU-8/9/SH2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>[Please see formatted submission sent by email] - tracked changes cannot be shown in Citizenspace or in this Excel spreadsheet)</p> <p>Crest Nicholson supports the proposed allocation of the Policy SH2 site which will form a sustainable extension to the North Whiteley Major Development Area (herein, "MDA") (specifically, land parcels CU14, CU34 &amp; CU45), known as Land off Bluebell Way.</p> <p>Proposals are well advanced on the Site with pre-application discussions with the Council and public consultation with the local community taking place in 2023.</p> <p>A planning application for circa 90 dwellings is to be submitted to the Council shortly.</p> <p>The application will include a full suite of technical information including the following:</p> <ul style="list-style-type: none"> <li>• Transport Assessment</li> <li>• Framework Travel Plan</li> <li>• Flood Risk Assessment and Drainage Strategy</li> <li>• Landscape and Visual Impact Assessment</li> <li>• Heritage Assessment</li> <li>• Noise Impact Assessment</li> <li>• Lighting Assessment</li> <li>• Ecological Impact Assessment (including Biodiversity Net Gain Metric)</li> <li>• Nutrient Neutrality Calculations</li> <li>• Shadow Appropriate Assessment</li> <li>• Tree Survey and Arboricultural Impact Assessment</li> <li>• Employment and Skills Plan</li> <li>• Statement of Community Involvement</li> <li>• Energy and Sustainability Assessment</li> </ul> <p>As demonstrated under the below headings, the Site is deliverable in accordance with Planning Practice Guidance :</p> <p>Available</p>



The Site is within the control of Crest Nicholson, a major national housebuilder promoting the land for residential development alongside land it has already developed in the North Whiteley MDA. There are no landownership or legal constraints that would prevent the delivery of housing.

Crest Nicholson has prepared an application for the development of the Site, demonstrating that it is available to be delivered.

#### Suitable

The Site is in a suitable location to accommodate residential development. The Site is accessible through the existing North Whiteley MDA, with access to the northern parcel achieved via Coldland Road and access to the southern parcel is achieved from the roundabout on Bluebell Way. The Site will connect to the pedestrian, cycle and bus routes into Whiteley Town Centre provided by the MDA and is within walking distance of nearby services and facilities including the adjacent Cornerstone Primary School, the Southern Neighbourhood Centre as well as the comprehensive green infrastructure network comprising playing fields and allotments. Swanwick Railway Station is located approximately 1.9km to the south of the Site and Botley Railway Station is located approximately 2.4km north of the Site. Collectively, these stations offer direct connections to London Waterloo, London Victoria, Southampton and Portsmouth. Bus routes also offer local connections to nearby towns alongside long distance services to Southampton and Portsmouth.

Access to the M27 is achieved from Junction 9 approximately 2km from the Site and provides direct travel routes between Southampton and Portsmouth. Future residents of the Site would be able to achieve their daily needs utilising sustainable modes of transport and the allocation of the Site for residential development therefore accords with Paragraph 108 of the Framework.

The Site is not constrained by any heritage designations and is located in Flood Zone 1 as detailed in the Environment Agency's Flood Map for Planning. The Site is neither constrained by ecological or landscape designations and provision will be made for a 15m buffer adjacent to the Ancient Woodland which lies along the western boundary of the southern parcel.

The Site is not affected by any public rights of way, nor constrained by its topography or any other physical constraints that would affect development in this location.

The planning application that will be submitted shortly for the development of the Site demonstrates that a residential development can be delivered in accordance with the relevant policies of the Plan as well as material considerations, notably the National Planning Policy Framework.

#### Achievable

The Site lies adjacent to the MDA which offers suitable connection to the existing infrastructure network. Crest Nicholson considers the residential development of the Site can be delivered with policy compliant levels of affordable housing – as demonstrated by the planning application that will be submitted shortly – to address the identified housing needs of the district.

#### Supporting Text

The supporting text to Policy SH2 at Paragraphs 13.16 and 13.20 includes reference to development of an extra care scheme, which was not included in the previous version of the plan. The 'Council Response to N

	<p>Whitely SH2 Reps' document clarifies that the extra care scheme has already been approved as part of the North Whiteley development but not counted within the original 3,500 dwellings allocation. As currently worded, Paragraph 13.16 is misleading as it suggests that an extra care scheme is allocated for development and not yet approved. This conflicts with Paragraph 16 of the Framework which states that plans should be 'clearly written' and 'unambiguous'. As currently worded it suggests an additional extra care scheme is expected to be included in a future planning application when this is clearly not the case. Furthermore, it is not clear which land within the SH2 allocation the extra care scheme relates to and this should be clearly set out.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Amendment to paragraphs 13.16 and 13.20 to provide clarity on the extra care scheme.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Crest Nicholson suggest Paragraph 13.16 is amended as follows with reference to where the extra care scheme has been approved:          "At North Whiteley additional capacity can be achieved through small extensions to the proposed development area, without breaching important boundaries, and development of an extra care scheme (planning permission has already been granted for the extra care scheme under planning reference XXX on land off XXX). These are expected to give an additional capacity of about 200 dwellings over and above the approximately 2,500 (at April 2023) still to be developed through the existing planning consent.          Paragraph 13.20 should be amended as follows:          "In addition, the development of an extra care scheme on land off XXX approved under planning reference XXX will contribute a further approximately 40 dwelling equivalents."          The allocation map should also clearly show where the extra care scheme has been approved.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Supporting document 1 (commenting on policies and evidence base)</a>  <a href="#">Supporting document 2 (Policy SP1 comments)</a>  <a href="#">Supporting document 3 (Policy CN1 comments)</a>  <a href="#">Supporting document 4 (Policy CN3 comments)</a>  <a href="#">Supporting document 5 (Policy D1 comments)</a>  <a href="#">Supporting document 6 (Policy D3 comments)</a>  <a href="#">Supporting document 7 (Policy T1 comments)</a></p>

<p><i>such as images, tables, or tracked changes, if applicable.</i></p>	<p><a href="#"><u>Supporting document 8 (Policy NE5 comments)</u></a> <a href="#"><u>Supporting document 9 (Policy H5 comments)</u></a> <a href="#"><u>Supporting document 10 (Policy SH2 comments)</u></a> <a href="#"><u>Supporting document 11 (Integrated Assessment (Sustainability Appraisal))</u></a></p>
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<b>Policy/Evidence base document</b>	SH2
<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/15/SH2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>There are a number of Ancient woodlands located throughout the allocation boundary. We have concerns regarding the policy wording recommending that the existing woodland on and adjoining the site should be used to provide recreational facilities and as a possible wood fuel source. Impacts associated with close proximity between a development and a woodland include tipping, soil compaction around tree roots, increased light pollution, localised enrichment and contamination of soils.</p> <p>We recommend that the policy is amended to ensure that any development coming forward complies with the Ancient Woodland standing advice which requires a minimum 15 buffer from the canopy edge, larger buffers may be required particularly for any parcels coming forward which are adjacent to Botley Woods, and Everett's and Mushes Copses SSSI. They should also incorporate SuDS to prevent surface water run-off into the woodlands. Where possible access to these woodlands should be prevented or carefully managed to prevent damage to sensitive habitats. This allocation policy should be linked to policy NE15.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <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></p>
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<b>Policy/Evidence base document</b>	SH2
<b>Name of respondent (or client)</b>	Fareham Borough Council
<b>Personal reference number</b>	BHLF-AQTS-3266-A - Fareham Borough Council
<b>Full reference number</b>	BHLF-AQTS-3266-A - Fareham Borough Council/7/SH2
<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  Policy SH2 - North Whiteley  Fareham Borough Council recognise the opportunities to meet housing need through the proposed small extensions to the North Whiteley development area. Fareham Borough Council welcomes that developments will be required to align with and support the proposed South East Hampshire Rapid Transport network extensions and the Fareham Local Cycling and Walking Infrastructure Plan (LCWIP) network.</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>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	SH2
<b>Name of respondent (or client)</b>	Jonathan Marmont
<b>Personal reference number</b>	ANON-AQTS-32ZM-5
<b>Full reference number</b>	ANON-AQTS-32ZM-5/4/SH2
<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 agree that further North Whiteley development could be appropriate in some of the proposed areas and mostly agree with Winchester Council's development policies. Based on my local knowledge, my response focuses on the areas of the CU14, CU34 and CU45 proposals.</p> <p>I agree that the development of CU45 (currently a builder's yard and an additional field to the north-west) would be a more productive/attractive use of that space and could contribute towards meeting the council's targets; either as housing and/or healthcare provision.</p> <p>However, I strongly object to the proposed policy to develop CU14 and the remainder of CU34 (not included in CU45) because of the reasons set out below.</p> <p>The CU14 and CU34 sites are made up predominantly of ancient woodland, habitat-enriching hedgerows and green space which afford significant relief to nearby dwellings and make an important contribution to the distinctive character and identity of nearby settlements: a key element of your Living Well and Biodiversity policies.</p> <p>These sites have become increasingly important for residents and wildlife as they include the only remaining, untouched small fields and hedgerows nearby since development of North Whiteley began, alongside important Ancient Woodland. Since building commenced, I have noticed a marked increase in presence of a large variety of wildlife in CU14 and CU34, including deer, foxes, rabbits and a variety of small birds and birds of prey. The destruction of these sites and habitat would have a significant negative impact on local wildlife, biodiversity, and the view for all new residential properties to the north and existing properties to the west and particularly south. Given that the properties to the south and west have already suffered visual impact as a result of the North Whiteley development, expansion of the development area would result in a cumulative visual impact, in contravention of Policy NE14 – Rural Character.</p> <p>Development of these sites would also remove an important green buffer between the old and new Whiteley developments, between Whiteley and Curbridge and create additional light and noise pollution. In light of this, development of CU34 (in its entirety) and CU14 would result in loss of the valuable wildlife sites and corridors which contravenes Biodiversity Policies NE5 – Biodiversity and NE14 – Rural Character.</p>



Furthermore, the Development Strategy and Site Selection, Initial Technical Appraisals document identifies that the proposed sites have wildlife value, making compliance with the requirement of the Environment Act of 2021 to support a measurable 10% gain in biodiversity value incredibly challenging.

The CU14 and CU34 proposals are not comparable to the building work taking place on the nearby, much larger fields because any work undertaken, even if some trees around the periphery of that field were to be preserved, would require the destruction of a large number of trees, as well as invaluable ancient woodland and hedgerows, to provide access to the houses built there. The destruction required to build on these sections (in contrast to the building yard in CU45) cannot be justified in relation to council's policy commitments:

- Strategic Policy D6 – Brownfield Development and Making Best Use of Land
- Vision Objective “Living Well”
- Biodiversity Policy NE1 - Protecting and enhancing Biodiversity and the Natural Environment and
- Policy NE15 – Special Trees, Important Hedgerows and Ancient Woodlands.

I commend the council for its commitment to site specific requirement i. “protect and enhance the various environmentally sensitive areas within and around the site, avoiding harmful effects or providing mitigation as necessary” and also that “The existing woodlands on and adjoining the site should be used to create attractive neighbourhoods, improve biodiversity, provide recreational facilities including areas for children’s play”. However, the impact of building on CU14 and that area of CU34 not included in CU45, is incompatible with this policy and it is unlikely that the significant loss of hedgerows and ancient woodland on these sites and the impact it would have on wildlife, could be mitigated against.

Comments relating to SH2 supporting text:

13.16

I disagree with the statement that “additional capacity can be achieved ... without breaching important boundaries”. The proposed extensions to the development area breach the western edge of Curbridge Village which, as stated on page 30 on the North Whiteley Design Code Appendix A, “requires protection of its setting”.

13.19

A key aspect of vital infrastructure is health care. Although schools are being built there has to date been no increase in the health system capacity for Whiteley which is already inadequate to meet the needs of residents. CU45 (builder’s yard) would be an excellent, central and accessible location to provide an additional GP surgery.

13.20

See response to 13.16 about breaching boundaries. In addition, I disagree with the implied suggestion that the CU14 and CU34 sites are suitable for development because they do not need to be preserved to mitigate “potential environmental impacts”. In contrast to the large, open fields which are being built on in the surrounding area, CU14 and CU34 are predominantly made up of ancient woodland, hedgerows and a very small field – all of which are vital habitat for the local wildlife whose habitat has been severely reduced due to

	<p>building in the neighbouring fields. Since building commenced I have noticed a significant increase in presence of a large variety of wildlife in CU14 and CU34, including deer, foxes, rabbits and a large variety of small birds and birds of prey.</p> <p>13.23</p> <p>I am very pleased that the plan seeks to “maximise the advantages of the site’s landscape setting, including existing trees and hedgerows. A key feature will be to ensure that the development area links with the adjoining countryside and creates an enhanced recreational experience for adjoining communities”. However, the CU14 and CU34 proposals are in contradiction with this commitment. The majority of CU14 and 34 are Ancient Woodland and hedgerows and the small size of the field would mean that, even if trees around the periphery of that field were to be preserved, a large number of them would need to be cut down in order to provide access to the houses built there. The destruction required to build on these sections (in contrast to the building yard in CU45) cannot be justified in relation to the commitments the council has made.</p> <p>13.25</p> <p>As noted earlier, the council must increase the capacity of local health systems and CU45 would provide an ideal location to build a new GP surgery easily accessible for all Whiteley residents – and particularly as it is opposite the new primary school.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Feedback Summary</p> <p>If more development must go ahead in this area, this should be limited to proposal CU45 only. I strongly object to any development of CU14 and that part of CU34 not included in CU45 for the reasons setout above. However, if these sites mu</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>No</p>

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

<b>Policy/Evidence base document</b>	SH2
<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/35/SH2
<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>	SH2
<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/32/SH2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Developer contributions has been secured to deliver a second new primary and new secondary school to support the expansion of the North Whiteley 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, 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>	SH2
<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/17/SH2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	This policy is not sound in that it fails to follow the sustainable transport provisions of the NPPF or support Policy CN1 in any meaningful way. Sub policy iii mentions a public transport strategy, but fails to specify a railway station at North Whiteley. At the northern tip of the development, on a rail line with spare capacity, this is an opportunity to support policy CN1 that should not be missed. Policy iv is wrong to suggest that enlarging junction 9 of M27 will encourage modal shift. The accompanying Botley by-pass Policy SH6 will increase emissions even more and undermine policy CN1. A development as large as this should include extensive requirements for pedestrian and cycling internal networks, direct cycling and pedestrian connections to the north, and requirements for bus connections to Eastleigh and Bishop's Waltham to supplement the current bus connection with Fareham.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Remove (iv) which is inaccurate about the likely impact of enlarging Junction 9 of the M27. Add 24 miles of walking routes and 24 miles of wheeling/cycling routes
<b>What is your suggested wording or text for the policy?</b>	Replace sub-policies iv and v with: iv. Provide infrastructure to bring about modal shift which minimises car usage, It should achieve reductions in transport emissions proportionate to the Winchester District target of net zero emissions by 2030. A network 24 miles of cycling, and 24 miles of walking routes would be needed across the whole area to achieve this change v. Work with network Rail to build a railway station in North Whiteley and develop bus services. There is a requirement for direct bus connections to Eastleigh and Bishop's Waltham to supplement the current bus connection with Fareham. Complete Whiteley Way at an early stage of development, in an environmentally sensitive manner which does not cause undue severance for the new community or encourage traffic from adjoining areas to use the new route to gain access to the strategic road network;
<b>Do you agree with how the 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>	SH2
<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/91/SH2
<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>	SH2
<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/37/SH2
<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 SH2 North Whiteley: Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider. Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p> <p>Supporting Text: Southern Water is the statutory wastewater undertaker for the areas 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 each 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. 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). Our initial assessment of the site also 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</p>

	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 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>	SH2
<b>Name of respondent (or client)</b>	Vistry Group (land at Fairthorne Grange Farm and Brindle Farm, Curbridge, Whiteley)
<b>Personal reference number</b>	ANON-AQTS-32UE-R
<b>Full reference number</b>	ANON-AQTS-32UE-R/6/SH2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Given the strategic importance of the North Whiteley allocation that is being built currently, and Whiteley's significant housing and economic role within the district, the additional allocation of only c. 200 dwellings under Policy SH2 represents an exceptionally conservative approach and fails to recognise the additional capacity for expansion that exists at this location.</p> <p>As evidenced by the council's Strategic Housing and Economic Land Availability Assessment 2023 there is obvious scope for expansion of North Whiteley, supporting and benefiting from the substantial infrastructure investments being made in this locality including new schools, greenspaces and transport infrastructure.</p> <p>Vistry Group has promoted its land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road through earlier stages of plan making, including the preparation and submission of a Vision document which outlines the opportunity on this 23.8ha site adjoining North Whiteley. The site is referenced as CU32 in the Strategic Housing and Economic Land Availability Assessment 2023 as 'deliverable/developable' with an indicative capacity of 356 homes and the Vision document for Vistry presents a concept with the potential to deliver around 430 homes. It is urged that this site CU32 be allocated now as part of a strategy that can deliver and maintain an upward housing trajectory and better address need arising in South Hampshire as part of the duty to co-operate. It is a logical extension to the North Whiteley strategic allocation, being directly accessible to the planned community.</p> <p>The Vision document identifies the suitability of the location, being well connected to North Whiteley, the wider Whiteley settlement and to Botley Station. There is opportunity to:</p> <ul style="list-style-type: none"> <li>• Provide additional homes, supported by new and existing community facilities</li> <li>• Utilise topography to shape the siting and form of development, and provide countryside vistas, and</li> <li>• Deliver additional open space and ecologically managed areas on-site.</li> </ul> <p>Bovis Homes and Linden Homes who are part of Vistry Group have an ongoing track record of successful delivery of homes and infrastructure at North Whiteley, making a positive contribution to meeting development requirements in a sustainable manner. This can be continued on Land at Fairthorne Grange Farm and Brindle Farm as outlined in the Vision document.</p> <p>Vistry Group wishes to participate on this matter at the local plan examination</p>

<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Allocate Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road (site reference CU32 in the Strategic Housing and Economic Land Availability Assessment 2023) as further expansion of North Whiteley.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Modify the policy wording and content (plus associated policies map) to include the allocation of Vistry Group's land interest at Fairthorne Grange Farm and Brindle Farm, Botley Road (site reference CU32 in the Strategic Housing and Economic Land Availability Assessment 2023).</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:

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

Local Plan Reference or document	Policy SH3 Whiteley Green	
Total Number of Representations received	3	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	2	0
Sound	2	0
Complies with Duty to Cooperate	2	0
<b>Summary of Representations</b> The representations on this policy are supportive, including for the addition of new criteria following the draft Local Plan. The site promoter suggests some changes to the policy criteria and explanatory text to reflect the reduced housing capacity of the site or the current situation.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/90/SH3 <b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/34/SH3</b> <b>BHLF-AQTS-328R-8 - Hampshire County Council/31/SH3</b>		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Support for policy SH3; and</li> <li>• Whether there is a need for amendments to the criteria of policy SH3 and its explanatory text.</li> </ul>		

<b>Policy/Evidence base document</b>	SH3
<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/34/SH3
<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>	SH3
<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/31/SH3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>see PDF for mark ups and additional info</p> <p>The County Council is supportive of the Whiteley Green allocation and has comments to ensure the policy and supporting text reflects the current information available from the landowner. In order to reflect the proposed movement strategy and provide options for access, clause (i) to read: 'Provide safe vehicle, pedestrian and cycle access from Bader Way and / or Lady Betty's Drive, an attractive footpath and cycleway network, and provide convenient access to public transport;'</p> <p>To provide an appropriate level of play space provision to meet the needs of the development, based on the reduced capacity of 30 dwellings and available site area, clause (iv) to read: 'Provide on-site open space (Informal Open Space, and Local Equipped Area for Play) as part of a neighbourhood green to serve the proposed and surrounding development;'</p> <p>To provide up-to-date site information, delete the following text in paragraph 13.31, as this is not currently identified as a constraint: 'There are foul and surface water sewers running across the site which would require an easement of 6m to be kept clear of all buildings and tree planting.'</p> <p>The predicted number of children forecast to be generated by this development are unlikely to have a significant impact on the local primary or secondary schools.</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>	SH3
<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/90/SH3
<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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) to paragraph 13.31 (page 380) to address comments from Hampshire County Council

Local Plan Reference or document	Policy SH4 Solent Business Park	
Total Number of Representations received	3	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	1	1
Sound	1	1
Complies with Duty to Cooperate	1	1
<b>Summary of Representations</b> Most representations on this policy are supportive. The site promoter suggests a need for a more flexible policy in terms of employment uses, design, etc to attract investment (revised wording suggested).		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/3/SH4 ANON-AQTS-32G3-R/1/SH4 <b>BHLF-AQTS-3266-A - Fareham Borough Council/1/SH4</b>		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• General support for policy SH4; and</li> <li>• Whether policy SH4 is too restrictive in terms of employment uses, design, etc.</li> </ul>		

<b>Policy/Evidence base document</b>	SH4
<b>Name of respondent (or client)</b>	Fareham Borough Council
<b>Personal reference number</b>	BHLF-AQTS-3266-A - Fareham Borough Council
<b>Full reference number</b>	BHLF-AQTS-3266-A - Fareham Borough Council/1/SH4
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Full response on website Policy SH4 – Solent Business Park Fareham Borough Council continue to support the economic aspirations of the Winchester Local Plan and the ongoing commitment to the development and vitality of Solent Business Park through its retention as an employment allocation.
<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>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	SH4
<b>Name of respondent (or client)</b>	KW Forum Limited
<b>Personal reference number</b>	ANON-AQTS-32G3-R
<b>Full reference number</b>	ANON-AQTS-32G3-R/1/SH4
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Kennedy Wilson submitted representations to the Regulation 18 Local Plan consultation. Their previous representations have been given reference number ANON-KSAR-NKFC-K.</p> <p>All of the points raised in our previous representations remain valid. It is very disappointing to see that none of our suggestions have been taken forward into the Regulation 19 version of the draft Local Plan.</p> <p>The Policy Team will be aware that around the time of the Regulation 18 Consultation we were in pre-application discussions regarding the development of a large part of the undeveloped land for a life sciences occupier. The occupier subsequently abandoned the project in large part due to the overly restrictive design requirements of the adopted Local Plan Site Allocation undermining their ability to design a scheme that met their specific needs. These same design requirements have been carried forward into the Regulation 18 and 19 Local Plans.</p> <p>Since the representations were made to the Reg 18 Local Plan, Kennedy Wilson has met with officers informally (both in Policy and Development Management) to discuss the challenges facing the Site in terms of market demand, viability, and deliverability. The purpose of the discussions was to seek clarity as to the types of uses/occupiers that could be considered acceptable on the Site, having regard to both the adopted Local Plan and the emerging version. The discussions also explored whether a more flexible approach on design could be taken and the emerging policy wording (Policy SH4) be amended accordingly.</p> <p>As part of those discussions we presented the findings of a report prepared by Icen titled Solent Business Park: Commercial and Economic Assessment (July 2023 – “the July 23 Report”). This made clear that there is very weak demand for new office floorspace in this location, and instead demand for new floorspace in this location has come from industrial, warehousing, manufacture (defence, boats/ships/marine tech) and professional, scientific and technical activities. In terms of a key finding for Solent Business Park specifically, the July 23 Report concludes that:</p> <p>“To support employment growth in the Solent area, ensure a flexible approach to employment growth at the Business Park that supports key sectors and is not focused on office at the expense of other opportunities.”</p> <p>The findings of the July 23 Report were acknowledged and broadly agreed by officers.</p> <p>We note that the Council has now published further evidence relating to employment land, to support the draft Local Plan (document titled Planning, Regeneration &amp; Infrastructure: Employment Land Study (July 2024). In</p>

response, IcenI has therefore prepared a further short report titled Solent Business Park: Winchester Local Plan Reg 19 Consultation - Employment Land Matters (October 2024 – “the October 24 Report”).

The key findings include:

- The office market across Winchester remains weak, with very high vacancy rates and ongoing reductions in occupation. Rents are insufficient to justify viable new build. The office market is operating best in the City, with other areas such as the south showing very high vacancy. There is no indication this is likely to change.
- The industrial market is performing well in Winchester. Rents continue to rise and are above average for the area. There are a range of smaller and mid sized deals for tech and logistics operators requiring ‘mixed B’ type spaces.
- Solent Business Park has ongoing high vacancy in its existing premises. The park managers are working hard to fill space. The prospect of delivering more office space is unrealistic.
- Enquiries for space at Solent are from a diverse range of employment generating uses, including healthcare and mixed B type occupiers that require a broader use class than E(g).
- The 2020 Employment Study for Winchester recognised there was already an oversupply of office / employment space in the south of the district, even before COVID-19.
- The 2024 Employment Study lacks detail around a number of key issues - such as having no analysis of spatial market dynamics across the district; does not include market signals in terms of rents and vacancy; and makes no reference what actual supply is available by type / location. As such the recommendations are abstract and fail to meet the Planning Practice Guidance on economic needs assessment.
- The regulation 19 Local Plan itself includes a significant over allocation of office space and as such much of it is unlikely to come forward. Solent Business Park is considered to fall under this segment.
- Ultimately the policy designation of Class E(g) is too narrow for Solent Business Park and is not considered deliverable. A more flexible policy including B2, B8 and other employment generating uses is necessary to ensure job creating development at this location.

Further evidence to support these findings can be submitted at the next stage of the plan making process if necessary, or earlier if the Council prefers. Both the July 2023 Report and the October 24 Report are submitted to the Regulation 19 Local Plan consultation and we ask that its findings are taken into account, and the wording of draft Policy SH4 and its sub-text are amended accordingly.

The wording of draft Policy SH4 is too narrow, and focusses on the notion of “business park development”. It also refers to “high technology business use”. Both of these concepts are without definition in the draft plan and seemingly no evidence to indicate why Solent Business Park should be categorised/restricted in this way. We consider these terms should be removed from the policy wording to create more flexibility to capture a wider range of employment generating opportunities.

Draft Policy SH4 continues to states a requirement for only Class E(g) uses to be delivered, and continues to impose design restrictions. In our view, the policy is overly restrictive in terms of land use, and overly



prescriptive in terms of design requirements. The factors will stifle development coming forward, as is evident given the long-term under-delivery of the Site.

The Government's agenda is about promoting economic growth, in part through development and the creation of job opportunities. Fundamentally, a key objective of the draft Local Plan is about creating job opportunities by ensuring land is available in the right locations for employment use. There is an acknowledgement of the desire to move to a lower carbon economy and to encourage innovative technologies and employment opportunities to deliver this aspiration. This is understood and supported; however, draft Policy SH4 does not appropriately reflect the evidence base and ignores market signals. There is demand for B2 and B8 uses in this location and the allocation should be flexible enough to accommodate these uses. There appears to be no evidence from the Council to indicate why Solent Business Park cannot accommodate these uses.

In response to our previous representations the Council states:

"The respondent suggests that a much wider range of uses should be permitted, including those in Class E and 'Sui Generis' uses. These could include retail, leisure and various other uses, many of which should be accommodated in town centre locations, or may not be appropriate. Again, it may be possible to demonstrate that a particular use is acceptable, as has been done in the case of the extant consent, but this should be against a policy background that seeks to retain the existing emphasis on offices, research and development, and light industrial uses."

We specifically asked for B2 and B8 uses to be allowed at Solent Business Park. These are not town centre uses, and are appropriate at the Site. Both uses would generate employment opportunities. B2 uses can be considered "high technology" (there's no definition of this) and can be designed to fit in with a business park environment. Per the July 23 Report key sectors of defence, marine tech and general manufacturing could all need to operate under use class B2/B8, but would be precluded from locating to Solent Business Park at present.

Planning conditions can be used to mitigate potential impacts such as noise, dust, odour and so on. The wording of the Allocation and other relevant policies could allow for B2 and B8, and if necessary could be drafted in a such a way to preclude specific types of uses that would not be appropriate, e.g. "the proposed use and development must not harm the amenity of Solent Business Park by way of unacceptable noise, air quality, odour, or visual impact, by way of causing nuisance and disturbance to other occupiers on the Allocation."

As for retail and leisure uses, the points we have previously made remain valid. The Site needs to modernise and become more attractive for occupiers over the long term. There is a limited offer in terms of food and beverage, activities before/after work, amenities and services, and convenience retail. The Site is relatively isolated and this adds to the lack of interest in new space here. By enabling a gym, a creche, a convenience food store, café/restaurant/bar etc. on site this would add to the attractiveness, sustainability, and long term viability of the Site as a whole. Such uses also employ a range of people, which aligns with wider objectives set out in the plan (draft Policies E1 and E5).

The Council states that it is for the applicant to make a case for ancillary uses, or for other employment generating uses. In our view, it would be a far better alternative and more positively worded policy to make clear upfront to the land owners/developers/potential occupiers that the Site is encouraging of a wide range of employment generating uses, and is attractive to staff and visitors. Ancillary uses are a key component of this, alongside attractive grounds and wider estate environment.

We also note that draft Policy E1 and E5 seek to promote other employment generating uses that are outside of traditional E(g), B2/B8. We note that such uses are encouraged generally, but directed to within settlement boundaries in the first instance. Solent Business park has a role to play in capturing these other employment generating uses. For example, education and health care can both employ large numbers of people (equivalent to an office) and create high value jobs. the character of the buildings these uses would deliver would also align well with the aspiration for well designed buildings in a parkland setting. The spin off effects of these types of uses are also important to note. Where demand exists for such uses, Solent Business Park could be a suitable location for them, subject to compliance with other policies in the plan.

To ensure maximum flexibility in the policy to capture opportunities for investment and job creation, we recommend the insertion of the phrase “and other employment generating uses” into the policy. A case would need to be made for such a use at the time, but with more flexible wording it would signal to the market that there is suitable land available at Solent Business Park.

Regarding design, the Council stated in response to our representations:

“To change the requirements significantly for this last remaining element of the Business Park would risk a development that is out of character with, and of a lower standard than, the existing Park. The existing requirements, including on building heights and parkland landscaping, have resulted in a particular form and character of development, and should continue to be applied to the remaining phase. They do not prevent a case being made for variations, but should form the policy starting point for proposals.”

It is helpful that the Council state that there may be a case to deviate from the policy requirements, but we strongly urge the Council to take a more flexible and less prescriptive approach in its policy wording. As we have previously suggested, the wording should be relaxed so as to remove the specific requirements for 30% “parkland” to be delivered, and the restrictions on eaves heights. There is no evidence as to why 30% is the chosen target, and no evidence of other options tested.

Kennedy Wilson believe that landscaping and amenity space is a key component of delivering high quality employment development, as it can provide significant benefits to the environment, employees and the wider community. But this should not stifle development and jobs creation where the specific target cannot be met. To repeat our previous representations, instead of an arbitrary figure of 30%, the policy should be worded in a manner that requires proposals to deliver high quality and multifunctional landscaping, to provide a high quality setting for buildings whilst delivering spaces which are usable and of environmental and amenity value. An approach which focuses on the quality and value of landscaping and open space rather than the quantity is likely to lead to better design outcomes and benefits.

Criteria iii. of the policy states that development should “generally” avoid being over three storeys or 14 metres in height. It is not clear where in the evidence base for the Local Plan that this restriction is derived from. It is considered that the policy should be more flexibly worded and instead require building heights to be design-led and informed by landscape/townscape and visual impact assessment as necessary, to demonstrate acceptability. This would ensure that the development of the Site is not unduly constrained, can be optimised and meets occupier demands, whilst being designed to avoid and mitigate impacts on neighbouring uses and the surrounding area. This is a commonly used and sound approach to designing buildings and optimising development sites. Furthermore, such a change would align with the previous planning permission for the site which granted consent for buildings, including a “landmark” building, which exceeded the 14m/3 storey height and were found to be acceptable and of high quality design.

It is noted that in the Council’s assessment of the Site it states that it is of “low overall landscape sensitivity” - in response to IIA objective 10: To conserve and enhance the character and distinctiveness of the District’s landscapes. Given this, surely more flexibility can be provided in policy to encourage schemes to come forward and to be assessed on their own merits.

If the aspiration is for a high-quality environment is delivered as part of development, other policies in the plan can be used to achieve similar goals without being so prescriptive; and these should be applied with the development plan as a whole, taking into account the need to bring forward development at this longstanding vacant site for employment generating purposes.

During pre-application discussions the existing policy (reflected by the emerging policy) was used (in part) to dismiss the case being made for a major life sciences scheme which would have taken approximately half of the vacant land and created hundreds of high quality, high value jobs. The applicant was a regionally significant occupier.

The established expectations for parkland space and the cap on eaves height were used in a very direct way (as was concern for the business park character), ultimately damaging discussions with the applicant, because the policy allowed for this type of assessment, rather than a more nuanced and balanced approach. Whilst it is acknowledged that the pre-application scheme had other issues to address, the occupier felt the policy requirements were focused more on design than the economic benefits of their proposal, and ultimately the investment opportunity was missed. If we are to attract investment, policies should be drafted in the most positive and flexible way possible.

Finally, the Council’s response places significant weight on the existing character of the south part of the Site. This was developed many years ago, under a different development plan, and greatly different economic circumstances. That it was right to plan a site a certain way then, does not mean it remains the right solution now.

The south of the Site is characterised by large office pavilions facing both the central lake area, and the large areas of surface parking to the boundary. There is no demand for such office pavilions to be delivered again and it is highly likely that any development coming forward will be in the form of light industrial, industrial, storage, R&D and healthcare buildings. These occupiers will need buildings of various sizes, formats and

designs that may not be able to neatly fit the tests set out in draft Policy SH4, nor align with a the character set by historic office development.

If the Council is serious about seeing Solent Business Park come forward for its purpose of securing investment and growth, and creating good quality jobs, the draft Policy SH4 will need to be made more flexible, as suggested below. We consider the revised wording to be a reasonable request from the landowner who is keenly aware of the issues facing development (lack of) at the Site, and who is keen to see employment generating uses come forward at the earliest opportunity. We also think the request directly aligns with the Council's own statement at Para 10.4 of the draft Local Plan:

"The effect of recent events are still evolving and there are likely to be further changes to the economy of the country and locally, which are as yet unknown. With this background, it is vitally important that Local Plan policies are flexible to allow for the changes that may occur and support a green and robust economy."

Para 10.22 goes on to state:

"Uncertainty over the forecast scenarios and continuing economic structural changes all emphasise the need for flexibility regarding the specific make up of employment land between particular use classes."

With the above in mind, our suggested wording is as follows:

"Land at Solent 1, Whiteley (as shown on the map above) is allocated for employment generating uses. Planning permission will be granted provided that detailed proposals accord with the Development Plan and where possible meet the following specific development requirements:

Nature and Phasing of development

i Provide for a range of business uses falling within Use Class E(g), B2, B8, and other employment generating uses. In addition, ancillary commercial uses within the broader Use Class E are also supported to contribute to the amenity, sustainability and vibrancy of the Business Park;

ii A high standard of design so that the buildings make an individual and positive contribution towards the overall appearance of the Solent Business Park;

iii Building heights should be established on a plot by plot basis taking account of the commercial requirements of occupiers, and ensuring development accords with the character, height and scale of the wider Solent Business Park. They should be design led and informed by appropriate technical analysis, such as townscape/landscape and visual impact assessments, to demonstrate that unacceptable impacts on the surrounding area can be avoided.

iv the proposed use and development must not harm the amenity of Solent Business Park by way of unacceptable noise, air quality, odour, or visual impact, by way of causing nuisance and disturbance to other occupiers on the Allocation.

Environmental

v. Proposals should incorporate landscaping that responds to the needs of occupiers, and which meets the requirements of other policies of the plan including requirements for BNG, sustainable drainage, ecological mitigation and visual amenity.

	<p>vi. Include measures for the on-going maintenance and management of the landscape parkland. Other Infrastructure</p> <p>vii. Contribute to infrastructure needed to make the development acceptable in planning terms.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Kennedy Wilson submitted representations to the Regulation 18 Local Plan consultation. Their previous representations have been given reference number ANON-KSAR-NKFC-K. All of the points raised in our previous representations remain valid. It is very di</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Kennedy Wilson submitted representations to the Regulation 18 Local Plan consultation. Their previous representations have been given reference number ANON-KSAR-NKFC-K. All of the points raised in our previous representations remain valid. It is very disappointing to see that none of our suggestions have been taken forward into the Regulation 19 version of the draft Local Plan. The Policy Team will be aware that around the time of the Regulation 18 Consultation we were in pre-application discussions regarding the development of a large part of the undeveloped land for a life sciences occupier. The occupier subsequently abandoned the project in large part due to the overly restrictive design requirements of the adopted Local Plan Site Allocation undermining their ability to design a scheme that met their specific needs. These same design requirements have been carried forward into the Regulation 18 and 19 Local Plans. Since the representations were made to the Reg 18 Local Plan, Kennedy Wilson has met with officers informally (both in Policy and Development Management) to discuss the challenges facing the Site in terms of market demand, viability, and deliverability. The purpose of the discussions was to seek clarity as to the types of uses/occupiers that could be considered acceptable on the Site, having regard to both the adopted Local Plan and the emerging version. The discussions also explored whether a more flexible approach on design could be taken and the emerging policy wording (Policy SH4) be amended accordingly. As part of those discussions we presented the findings of a report prepared by Icen titled Solent Business Park: Commercial and Economic Assessment (July 2023 – “the July 23 Report”). This made clear that there is very weak demand for new office floorspace in this location, and instead demand for new floorspace in this location has come from industrial, warehousing, manufacture (defence, boats/ships/marine tech) and professional, scientific and technical activities. In terms of a key finding for Solent Business Park specifically, the July 23 Report concludes that: “To support employment growth in the Solent area, ensure a flexible approach to employment growth at the Business Park that supports key sectors and is not focused on office at the expense of other opportunities.” The findings of the July 23 Report were acknowledged and broadly agreed by officers. We note that the Council has now published further evidence relating to employment land, to support the draft Local Plan (document titled Planning, Regeneration &amp; Infrastructure: Employment Land Study (July 2024). In response, Icen has therefore prepared a further short report titled Solent Business Park: Winchester Local Plan Reg 19 Consultation - Employment Land Matters (October 2024 – “the October 24 Report”). The key findings include:</p>

- The office market across Winchester remains weak, with very high vacancy rates and ongoing reductions in occupation. Rents are insufficient to justify viable new build. The office market is operating best in the City, with other areas such as the south showing very high vacancy. There is no indication this is likely to change.
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Further evidence to support these findings can be submitted at the next stage of the plan making process if necessary, or earlier if the Council prefers. Both the July 2023 Report and the October 24 Report are submitted to the Regulation 19 Local Plan consultation and we ask that its findings are taken into account, and the wording of draft Policy SH4 and its sub-text are amended accordingly.

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“The respondent suggests that a much wider range of uses should be permitted, including those in Class E and ‘Sui Generis’ uses. These could include retail, leisure and various other uses, many of which should be accommodated in town centre locations, or may not be appropriate. Again, it may be possible to demonstrate that a particular use is acceptable, as has been done in the case of the extant consent, but this should be against a policy background that seeks to retain the existing emphasis on offices, research and development, and light industrial uses.”

We specifically asked for B2 and B8 uses to be allowed at Solent Business Park. These are not town centre uses, and are appropriate at the Site. Both uses would generate employment opportunities. B2 uses can be considered “high technology” (there’s no definition of this) and can be designed to fit in with a business park environment. Per the July 23 Report key sectors of defence, marine tech and general manufacturing could all need to operate under use class B2/B8, but would be precluded from locating to Solent Business Park at present.

Planning conditions can be used to mitigate potential impacts such as noise, dust, odour and so on. The wording of the Allocation and other relevant policies could allow for B2 and B8, and if necessary could be drafted in a such a way to preclude specific types of uses that would not be appropriate, e.g. “the proposed use and development must not harm the amenity of Solent Business Park by way of unacceptable noise, air quality, odour, or visual impact, by way of causing nuisance and disturbance to other occupiers on the Allocation.”

As for retail and leisure uses, the points we have previously made remain valid. The Site needs to modernise and become more attractive for occupiers over the long term. There is a limited offer in terms of food and beverage, activities before/after work, amenities and services, and convenience retail. The Site is relatively isolated and this adds to the lack of interest in new space here. By enabling a gym, a creche, a convenience food store, café/restaurant/bar etc. on site this would add to the attractiveness, sustainability, and long term viability of the Site as a whole. Such uses also employ a range of people, which aligns with wider objectives set out in the plan (draft Policies E1 and E5).

The Council states that it is for the applicant to make a case for ancillary uses, or for other employment generating uses. In our view, it would be a far better alternative and more positively worded policy to make clear upfront to the land owners/developers/potential occupiers that the Site is encouraging of a wide range of

employment generating uses, and is attractive to staff and visitors. Ancillary uses are a key component of this, alongside attractive grounds and wider estate environment.

We also note that draft Policy E1 and E5 seek to promote other employment generating uses that are outside of traditional E(g), B2/B8. We note that such uses are encouraged generally, but directed to within settlement boundaries in the first instance. Solent Business park has a role to play in capturing these other employment generating uses. For example, education and health care can both employ large numbers of people (equivalent to an office) and create high value jobs. the character of the buildings these uses would deliver would also align well with the aspiration for well designed buildings in a parkland setting. The spin off effects of these types of uses are also important to note. Where demand exists for such uses, Solent Business Park could be a suitable location for them, subject to compliance with other policies in the plan.

To ensure maximum flexibility in the policy to capture opportunities for investment and job creation, we recommend the insertion of the phrase “and other employment generating uses” into the policy. A case would need to be made for such a use at the time, but with more flexible wording it would signal to the market that there is suitable land available at Solent Business Park.

Regarding design, the Council stated in response to our representations:

“To change the requirements significantly for this last remaining element of the Business Park would risk a development that is out of character with, and of a lower standard than, the existing Park. The existing requirements, including on building heights and parkland landscaping, have resulted in a particular form and character of development, and should continue to be applied to the remaining phase. They do not prevent a case being made for variations, but should form the policy starting point for proposals.”

It is helpful that the Council state that there may be a case to deviate from the policy requirements, but we strongly urge the Council to take a more flexible and less prescriptive approach in its policy wording. As we have previously suggested, the wording should be relaxed so as to remove the specific requirements for 30% “parkland” to be delivered, and the restrictions on eaves heights. There is no evidence as to why 30% is the chosen target, and no evidence of other options tested.

Kennedy Wilson believe that landscaping and amenity space is a key component of delivering high quality employment development, as it can provide significant benefits to the environment, employees and the wider community. But this should not stifle development and jobs creation where the specific target cannot be met. To repeat our previous representations, instead of an arbitrary figure of 30%, the policy should be worded in a manner that requires proposals to deliver high quality and multifunctional landscaping, to provide a high quality setting for buildings whilst delivering spaces which are usable and of environmental and amenity value. An approach which focuses on the quality and value of landscaping and open space rather than the quantity is likely to lead to better design outcomes and benefits.

Criteria iii. of the policy states that development should “generally” avoid being over three storeys or 14 metres in height. It is not clear where in the evidence base for the Local Plan that this restriction is derived from. It is considered that the policy should be more flexibly worded and instead require building heights to be design-led and informed by landscape/townscape and visual impact assessment as necessary, to



demonstrate acceptability. This would ensure that the development of the Site is not unduly constrained, can be optimised and meets occupier demands, whilst being designed to avoid and mitigate impacts on neighbouring uses and the surrounding area. This is a commonly used and sound approach to designing buildings and optimising development sites. Furthermore, such a change would align with the previous planning permission for the site which granted consent for buildings, including a “landmark” building, which exceeded the 14m/3 storey height and were found to be acceptable and of high quality design.

It is noted that in the Council’s assessment of the Site it states that it is of “low overall landscape sensitivity” - in response to IIA objective 10: To conserve and enhance the character and distinctiveness of the District’s landscapes. Given this, surely more flexibility can be provided in policy to encourage schemes to come forward and to be assessed on their own merits.

If the aspiration is for a high-quality environment is delivered as part of development, other policies in the plan can be used to achieve similar goals without being so prescriptive; and these should be applied with the development plan as a whole, taking into account the need to bring forward development at this longstanding vacant site for employment generating purposes.

During pre-application discussions the existing policy (reflected by the emerging policy) was used (in part) to dismiss the case being made for a major life sciences scheme which would have taken approximately half of the vacant land and created hundreds of high quality, high value jobs. The applicant was a regionally significant occupier.

The established expectations for parkland space and the cap on eaves height were used in a very direct way (as was concern for the business park character), ultimately damaging discussions with the applicant, because the policy allowed for this type of assessment, rather than a more nuanced and balanced approach. Whilst it is acknowledged that the pre-application scheme had other issues to address, the occupier felt the policy requirements were focused more on design than the economic benefits of their proposal, and ultimately the investment opportunity was missed. If we are to attract investment, policies should be drafted in the most positive and flexible way possible.

Finally, the Council’s response places significant weight on the existing character of the south part of the Site. This was developed many years ago, under a different development plan, and greatly different economic circumstances. That it was right to plan a site a certain way then, does not mean it remains the right solution now.

The south of the Site is characterised by large office pavilions facing both the central lake area, and the large areas of surface parking to the boundary. There is no demand for such office pavilions to be delivered again and it is highly likely that any development coming forward will be in the form of light industrial, industrial, storage, R&D and healthcare buildings. These occupiers will need buildings of various sizes, formats and designs that may not be able to neatly fit the tests set out in draft Policy SH4, nor align with a the character set by historic office development.

If the Council is serious about seeing Solent Business Park come forward for its purpose of securing investment and growth, and creating good quality jobs, the draft Policy SH4 will need to be made more

flexible, as suggested below. We consider the revised wording to be a reasonable request from the landowner who is keenly aware of the issues facing development (lack of) at the Site, and who is keen to see employment generating uses come forward at the earliest opportunity. We also think the request directly aligns with the Council's own statement at Para 10.4 of the draft Local Plan:

"The effect of recent events are still evolving and there are likely to be further changes to the economy of the country and locally, which are as yet unknown. With this background, it is vitally important that Local Plan policies are flexible to allow for the changes that may occur and support a green and robust economy."

Para 10.22 goes on to state:

"Uncertainty over the forecast scenarios and continuing economic structural changes all emphasise the need for flexibility regarding the specific make up of employment land between particular use classes."

With the above in mind, our suggested wording is as follows:

"Land at Solent 1, Whiteley (as shown on the map above) is allocated for employment generating uses. Planning permission will be granted provided that detailed proposals accord with the Development Plan and where possible meet the following specific development requirements:

Nature and Phasing of development

i Provide for a range of business uses falling within Use Class E(g), B2, B8, and other employment generating uses. In addition, ancillary commercial uses within the broader Use Class E are also supported to contribute to the amenity, sustainability and vibrancy of the Business Park;

ii A high standard of design so that the buildings make an individual and positive contribution towards the overall appearance of the Solent Business Park;

iii Building heights should be established on a plot by plot basis taking account of the commercial requirements of occupiers, and ensuring development accords with the character, height and scale of the wider Solent Business Park. They should be design led and informed by appropriate technical analysis, such as townscape/landscape and visual impact assessments, to demonstrate that unacceptable impacts on the surrounding area can be avoided.

iv the proposed use and development must not harm the amenity of Solent Business Park by way of unacceptable noise, air quality, odour, or visual impact, by way of causing nuisance and disturbance to other occupiers on the Allocation.

Environmental

v. Proposals should incorporate landscaping that responds to the needs of occupiers, and which meets the requirements of other policies of the plan including requirements for BNG, sustainable drainage, ecological mitigation and visual amenity.

vi. Include measures for the on-going maintenance and management of the landscape parkland.

Other Infrastructure

vii. Contribute to infrastructure needed to make the development acceptable in planning terms.

<b>Do you agree with how the 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 (covering letter)</a> <a href="#">Supporting information (Employment Land matters)</a> <a href="#">Supporting documents (comments on policies)</a>

<b>Policy/Evidence base document</b>	SH4
<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/3/SH4
<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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

Local Plan Reference or document	Policy SH6 Botley Bypass	
Total Number of Representations received	3	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	3	0
Sound	1	2
Complies with Duty to Cooperate	2	1
<b>Summary of Representations</b> Some support for policy SH6 but a request that it is more positive than simply reserving the route of the bypass. Also, a request that the policy refers to the need for access to water supply infrastructure.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/13/SH6 ANON-AQTS-32NT-Z/2/SH6 <b>ANON-AQTS-327U-A - Southern Water/9/SH6</b>		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Some support for policy SH4; and</li> <li>• Whether policy SH6 should be more positive about the proposed bypass.</li> </ul>		

<b>Policy/Evidence base document</b>	SH6
<b>Name of respondent (or client)</b>	David Allen
<b>Personal reference number</b>	ANON-AQTS-32NT-Z
<b>Full reference number</b>	ANON-AQTS-32NT-Z/2/SH6
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy SH6 is broadly sound but should be more direct - The County Council have confirmed that funding has been allocated to build the Botley By-Pass and this Plan should confirm that statement. It is absolutely essential now that the By-Pass is built due to the massive and relatively uncontrolled development in the Boorley Green area which Eastleigh Borough Council failed to properly regulate or control - an example of how not to be a sound Planning Authority - meaning the existing local road network is already overrun adversely affecting the health and wellbeing of local residents. The construction of the By Pass should not be viewed as a matter of protecting the route - this Plan should ensure that the By Pass is built.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy SH6 is broadly sound but should be more direct - The County Council have confirmed that funding has been allocated to build the Botley By-Pass and this Plan should confirm that statement. It is absolutely essential now that the By-Pass is built due
<b>What is your suggested wording or text for the policy?</b>	Policy SH6 is broadly sound but should be more direct - The County Council have confirmed that funding has been allocated to build the Botley By-Pass and this Plan should confirm that statement. It is absolutely essential now that the By-Pass is built due to the massive and relatively uncontrolled development in the Boorley Green area which Eastleigh Borough Council failed to properly regulate or control - an example of how not to be a sound Planning Authority - meaning the existing local road network is already overrun adversely affecting the health and wellbeing of local residents. The construction of the By Pass should not be viewed as a matter of protecting the route - this Plan should ensure that the By Pass is built.
<b>Do you agree with how the 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>	SH6
<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/13/SH6
<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>	SH6
<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/9/SH6
<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 SH6 Botley Bypass</p> <p>As advised in the Reg 18 consultation, our initial assessment of this site ascertained that Southern Water's water supply infrastructure is in very close proximity and may align with some of the safeguarded land proposed for a bypass, for which we currently have easements in place.</p> <p>Discussions with Southern Water will be essential when designing proposals for the bypass, to ensure future protection of and access to this existing infrastructure.</p> <p>Therefore we make the following recommendation for a new policy criterion for Policy SH6.</p> <p>iii. measures are included to protect and ensure future access for maintenance and upsizing purposes to Southern Water's water supply infrastructure.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>We make the following recommendation for a new policy criterion for Policy SH6.</p> <p>iii. measures are included to protect and ensure future access for maintenance and upsizing purposes to Southern Water's water supply infrastructure.</p>
<b>What is your suggested wording or text for the policy?</b>	iii. measures are included to protect and ensure future access for maintenance and upsizing purposes to Southern Water's water supply infrastructure.
<b>Do you agree with how the 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>	<p>Yes</p> <p><a href="#">Supporting Document (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.*

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modification](#) - a new criterion for Local Plan policy SH6 (page 384) to address comments from Southern Water