

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

### Introduction – Vision and Objectives

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.

This has been updated to include comments that were submitted by Historic England but were not entered onto Citizenspace and therefore they were not included in the original version of this report.

Local Plan Reference or document	Policy SP1 Vision and Objectives	
<b>Total Number of Representations received</b>	46	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	24	12
<b>Sound</b>	14	27
<b>Complies with Duty to Cooperate</b>	22	14
<p><b>Summary of Representations</b>  Housing provision and affordability were significant concerns, accounting for 40% of feedback, demanding a robust policy to address housing affordability and meet unmet needs effectively. Community inclusion issues are raised by 29%, indicating barriers to participation and scepticism over genuine public influence. Environmental sustainability requires more focus, 27% of comments pushing for biodiversity and sustainable practices. Criticism of regional integration and unmet housing needs comprises 24% of responses, stressing the need for cross-boundary cooperation.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)  ANON-AQTS-3B2K-B/1/SP1  ANON-AQTS-3BM7-J/1/SP1  ANON-AQTS-3BAF-N/1/SP1  ANON-AQTS-3BAW-6/2/SP1  <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/13/SP1</b>  ANON-AQTS-3BSY-T/20/SP1  ANON-AQTS-3B4C-5/2/SP1  <b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/10/SP1</b>  ANON-AQTS-3291-8/1/SP1  ANON-AQTS-3B5A-4/2/SP1  ANON-AQTS-3299-G/4/SP1  ANON-AQTS-32UM-Z/1/SP1  ANON-AQTS-329Q-8/10/SP1  ANON-AQTS-32UU-8/1/SP1  ANON-AQTS-32G7-V/4/SP1  ANON-AQTS-32SJ-U/3/SP1  ANON-AQTS-3BQA-Z/4/SP1  ANON-AQTS-32T7-9/3/SP1</p>		

ANON-AQTS-3BX4-T/3/SP1

**ANON-AQTS-32FT-R - New Alresford Town Council/2/SP1**

ANON-AQTS-3BBP-Z/4/SP1

ANON-AQTS-327B-Q/4/SP1

ANON-AQTS-32MY-4/2/SP1

ANON-AQTS-32MD-F/1/SP1

ANON-AQTS-32T4-6/1/SP1

ANON-AQTS-32Z2-A/1/SP1

ANON-AQTS-323A-J/1/SP1

ANON-AQTS-32MQ-V/2/SP1

ANON-AQTS-32ZM-5/3/SP1

BHLF-AQTS-32ED-7/1/SP1

BHLF-AQTS-32EP-K/1/SP1

BHLF-AQTS-32EJ-D/1/SP1

BHLF-AQTS-326Y-D/1/SP1

**BHLF-AQTS-3262-6 - Eastleigh Borough Council/1/SP1**

**BHLF-AQTS-3266-A - Fareham Borough Council/3/SP1**

BHLF-AQTS-32YG-X/2/SP1

**BHLF-AQTS-32YK-2 - Marine Management Organisation/1/SP**

**BHLF-AQTS-3282-8 - Natural England/6/SP1**

BHLF-AQTS-328A-Q/1/SP1

BHLF-AQTS-328X-E/4/SP1

BHLF-AQTS-3286-C/4/SP1

BHLF-AQTS-328G-W/4/SP1

BHLF-AQTS-32QE-M/1/SP1

BHLF-AQTS-32QY-8/1/SP1

BHLF-AQTS-32QZ-9/1/SP1

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

- Whether the vision and objectives should be included in a Plan policy;
- Whether the Vision and Objectives are sufficiently clear, and whether further flexibility or amendments are required;
- Whether the vision and objectives sufficient address housing affordability and unmet need;
- The closure of Andover Road;
- Whether the Plan will have a fifteen year lifespan following adoption;
- Alternative and additional sites proposed for development; and
- Whether the Plan meets legal and procedural requirements, given the ongoing work on the HRA.

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b> PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>WCC recognises that since the adoption of the previous Local Plan (in 2011), there has been a range of new evidence produced and there are a number of new factors at play which influence the planning process, namely the fact that WCC declared a climate emergency in 2019 but also the economic change and uncertainty which has occurred following Brexit and the legacy of the COVID-19 pandemic. Bloor supports the overall vision set out at page 21 of the R19 LP, and place emphasis on the importance of paragraph 2 in particular: “New development will address the needs of the area and enhance the sustainability of communities, natural environment and the economy and respond to the wider relationship with neighbouring areas. The climate and nature emergencies will lead to energy efficiency standards ensuring that residential development is built to net zero carbon. The concept of 20 minute neighbourhoods and active travel is ensuring that development is connected to public transport rights of way and cycleways” [our emphasis added].</p> <p>Bloor consider that objectives (i), (ii) and (iv) are properly addressed within the vision, however greater emphasis to the importance of delivering new homes (including affordable homes) is required as opposed to simply referencing “the needs of the area”. Furthermore, while Bloor support the vision and objectives as set out in Strategic Policy SP1 (vision and objectives), it is not considered that the R19 LP as drafted will deliver these ambitions, meaning the Local Plan cannot be deemed sound.</p> <p>Manor Parks can help to achieve WCC’s aspirations by delivering high-quality low carbon homes in a sustainable location that will meet a range of needs and aspirations including - a 20-minute neighbourhood; sustainable transport corridors and affordable housing (policy compliant provision). The scheme would also</p>

	provide local services and connections including a significantly improved public transport service for the existing residents of Oliver's Battery, which is currently poorly connected to the wider urban area.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Considered that greater emphasis on the importance of housing is required.
<b>What is your suggested wording or text for the policy?</b>	Considered that greater emphasis on the importance of housing is required.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a> <a href="#">Supporting document 1 (South Winchester Vision Document)</a> <a href="#">Supporting document 2 (Response to the delivery of housing)</a> <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a> <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a> <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Alice Lack
<b>Personal reference number</b>	ANON-AQTS-327B-Q
<b>Full reference number</b>	ANON-AQTS-327B-Q/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Welbeck would like to reiterate their support for the overall vision set out at page 19 of the Reg 19 Local Plan. The Land at MEF can help to achieve WCC's aspirations by delivering high-quality homes in a sustainable location that will meet a range of needs and aspirations, including 20-minute neighbourhoods, sustainable transport corridors and affordable housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Andrea Joy Sawyer
<b>Personal reference number</b>	ANON-AQTS-3B2K-B
<b>Full reference number</b>	ANON-AQTS-3B2K-B/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The plan to close the Andover Road is terrible. Kings Barton haven't got the road structure to deal with the extra traffic. Harestock Road will get very busy and so will Priors Dean Road. It is also not environmentally friendly. It means vehicles will have to make a longer journey. If the council thinks it will encourage people to walk more, I think the hassle will just encourage people not to come and shop in Winchester at all. Which if businesses close down, that will mean less business rates for the council.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Stop closing the Andover Road
<b>What is your suggested wording or text for the policy?</b>	No closure of Andover Road
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No



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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Andrew Uwins
<b>Personal reference number</b>	ANON-AQTS-3BBP-Z
<b>Full reference number</b>	ANON-AQTS-3BBP-Z/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Hazeley would like to reiterate their support for the overall vision set out at page 19 of the Reg 19 Local Plan. The Land at 10 Harestock Road can help to achieve WCC's aspirations by delivering high-quality homes in a sustainable location that will meet a range of needs and aspirations, including 20-minute neighbourhoods, sustainable transport corridors and affordable housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies - includes pictures)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/4/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bargate Homes welcomes the commitment contained in Policy SP1 and support the acknowledgement within SP1 that the council must use available tools at its disposal to unlock sites which are key to the Plan’s delivery. However, and in this context, it is considered that the plan, as currently drafted, fails to deliver in this respect. In particular the policy lacks clarity over the vision. Instead of a positive and flexible response to this element of the vision, and requirements under the Duty to Cooperate (specifically related to the joint working through the Partnership for South Hampshire (PfSH)), the plan represents a restrained approach to housing provision and delivery. ‘Objectives’ make no reference to delivering homes to accommodate the unmet needs of neighbouring areas, with a reference only to meeting ‘local needs’ under objective iv). Despite the chronic affordability challenge that Winchester is facing, there is no mention in either the vision or objectives to addressing affordability, more generally over and above the delivery of affordable housing, despite the clear acknowledgement (in the Foreword) of the challenge of affordability. Given that Policy SP1 gives effect to both Vision and Objectives by requiring development proposals to contribute to, and be compatible with, them, it is imperative that they fully reflect both the need to address the stated affordability issues, and need to assist with accommodating some of the wider sub-regional unmet housing needs (beyond local housing needs), under the DtC.</p> <p>Dealing with cross-boundary matters is a fundamental part of plan preparation and central to the test of soundness and yet, despite the PfSH Common Ground and Spatial Position Statement, it is clear that Winchester has not undertaken ongoing or constructive engagement with specific neighbouring authorities to consider how unmet needs can be accommodated, in accordance with the NPPF (e.g. paras 11 b), 26 &amp; 61) and DtC. This is highlighted by the Statements of Common Ground submitted at this stage, which acknowledge a lack of positive and proactive dialogue. Specifically, the Council has failed to respond positively to the direct requests of both Portsmouth and Havant councils. The collective request from both neighbouring authorities, amounts to 7,886 homes (4,377 from Portsmouth, less 800 provided for in the Fareham plan, and 4,309 from Havant). We would highlight that: “PCC considers that WCC should identify specific sites in its Plan to help meet the unmet need of the City and other LPAs as necessary. Relevant sites</p>

	<p>should be located close to the boundaries of the relevant LPAs and within the relevant housing market area.” The agreed position being, “Portsmouth City Council has therefore formally approached Winchester District to request help in meeting the City's unmet housing need of 219 dwelling per annum.” For Havant, “Nonetheless, whilst WCC has responded to the March 2024 request, this did not contain an offer to accommodate the unmet need from Havant Borough nor an offer to engage regarding the preparation of the Winchester Local Plan. As such there is an unmet housing need of 4,309 remaining at the point of signature of this interim SoCG.”</p> <p>Winchester has failed to consider this scale of need, and the opportunities that exist to accommodate it (NPPF paragraph 11 b). Instead they have identified an ‘allowance’ which is not ring-fenced or site-specific and appears to be derived from the previous (Reg 18) ‘buffer’ approach (see Housing Topic Paper paras 4.46 – 4.53) rather than an assessment of opportunities and potential capacity to meet such need. As such, the plan lacks clarity and focus in this respect, and it remains uncertain as to how much and where unmet needs are being addressed within the district. There are additional site opportunities available, within the parameters of the spatial strategy, which could be added to the supply to make a fuller response to the scale of the unmet need, but Winchester has constrained itself as a consequence of the buffer approach embedded in the Reg 18 plan and failure to properly review this response for the Reg 19 stage. These concerns are reflected through the Integrated Impact Assessment (IIA). Reasonable alternatives should be considered, in that the IIA failed to consider alternatives that would help to address unmet need, including with reference to geographical considerations (noting that the PfSH area only covers the southern part of the district).</p> <p>Inevitably, the pressure that the unmet need (whether planned for or not) will place on the southern part of the district will, in turn, place pressure on Winchester City to take the burden of meeting the ‘local need’. In any event, Winchester City is a sustainable location at which to address affordability issues, both through the provision of affordable housing but also by increasing housing land supply more generally. The draft local plan does not meet the tests of soundness and is therefore not appropriate for submission. Further, the DtC has not been demonstrated. It is clear that the local housing need, as calculated by the standard methodology, both for Winchester and for the PfSH area is increasing significantly (as indicated by the recent consultation on an updated methodology).</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>A change to Policy SP1 is required to make an explicit reference to addressing affordability, meeting local needs and helping to meet the unmet needs of the sub-region under the DtC. Further, the policy should be modified to make it clear that the plan is flexible and responsive to changing needs according to the NPPF paragraph 11.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The following wording should be added to the policy (with corresponding amendments to the supporting text, vision and objectives) to ensure compliance with NPPF paragraph 11: The council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development</p>

	that is focused around sustainable travel modes of transport and will use available tools at its disposal in order to unlock sites which are key to the Plan's delivery. The Plan will meet the aims set out in the Vision and Objectives by ensuring that new development meets local needs and helps to address unmet needs from neighbouring authorities, seeks to address affordability within the district, and facilitates a positive response to changing circumstances, contributing toward them as follows - ...."
<b>Do you agree with how the 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>	SP1
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/10/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bloor Homes support in principle the approach set out in Policy SP1 in particular the need to deliver the aspirations for each sub-area. It should also be acknowledged that the revised standard method proposed by the new Government will further increase housing requirements in Winchester. Bloor Homes supports the recognition at paragraph 2.12 that the ability to provide affordable housing is influenced by whether a site is greenfield or brownfield and whether there is a need to mitigate the impacts of nitrogen and/or phosphorous. It should be recognised within this paragraph that there are other potential costs that can affect the viability of developments, for example, site-specific infrastructure costs and abnormal costs. The NPPF and NPPG suggest that a typology approach is taken to the assessment of viability. Whilst this approach is acknowledged, it must equally be acknowledged that every site is different and there may be a need for site specific viability assessments, as identified at Paragraph: 006 Reference ID: 10-006-20190509 of the NPPG.</p> <p>We recommend that Criteria iv under the Tackling the climate emergency and creating a greener district objective should be amended to read “Ensure that development is designed to provide biodiversity net gain and does not have an unacceptable adverse impact on landscape character and historic environment and the unique and special characteristics of the South Downs National Park”. This is in recognition that development can impact landscape character and the historic environment, but this need not be unacceptable. Moreover, we consider that an amendment to Criteria vii of the same objective is required, and propose that it to be revised to state “Maximise the use of low carbon infrastructure and construction methods and drainage systems and encourage the use of locally sourced materials, where possible, to protect the integrity of the natural systems and resources”. The additional wording recognises that flexibility needs to be applied to the particular circumstances of a development.</p> <p>The Vision and Objectives should be inserted within the Strategic Policy SP1 itself in a succinct form. Presently the policy cross references to supporting text which is not a statutory part of a plan and has a purpose for setting the context and justification for a policy. Whilst it is important for the plan to have ambition</p>

	<p>it is necessary that the vision and objectives are practical, affordable and feasible and therefore the theme of deliverability should also be an emphasis of this overarching policy.</p> <p>Alongside growth in other parts of the district, market towns and villages need to be able to grow to support the shops, services and facilities that they offer existing and future residents. The Vision and the plan should take forward this aim to ensure that the market towns and villages are allowed to grow in the period up to 2040. The plan, as currently drafted does not allocate sufficient housing at settlements such as Wickham, a Larger Rural Settlement to support their sustainability. Bloor Homes does not consider that the ambitions of Policy SP1 will be delivered with the ability to address the housing needs of the area and enhance the sustainability of communities compromised. As drafted, the plan cannot therefore be found sound.</p> <p>In the particular case of Wickham, whilst we support the draft allocation at Mill Lane (draft Policy WK5), we consider that this allocation should be expanded to encompass the Land at Junction of Mill Lane, Wickham (WI06). This forms part of the masterplan previously promoted and would increase the total number of units from 40 to approximately 100. This modest level of additional growth in this location would still enable Wickham to retain its identity and would not unacceptably impact its heritage or rural character. It would also contribute to the significant level of unmet need within the Partnership for South Hampshire area and to the requirement for additional housing provision under the proposed amended standard method.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bloor Homes support in principle the approach set out in Policy SP1 in particular the need to deliver the aspirations for each sub-area. It should also be acknowledged that the revised standard method proposed by the new Government will further increase housing requirements in Winchester. Bloor Homes supports the recognition at paragraph 2.12 that the ability to provide affordable housing is influenced by whether a site is greenfield or brownfield and whether there is a need to mitigate the impacts of nitrogen and/or phosphorous. It should be recognised within this paragraph that there are other potential costs that can affect the viability of developments, for example, site-specific infrastructure costs and abnormal costs. The NPPF and NPPG suggest that a typology approach is taken to the assessment of viability. Whilst this approach is acknowledged, it must equally be acknowledged that every site is different and there may be a need for site specific viability assessments, as identified at Paragraph: 006 Reference ID: 10-006-20190509 of the NPPG.</p> <p>We recommend that Criteria iv under the Tackling the climate emergency and creating a greener district objective should be amended to read “Ensure that development is designed to provide biodiversity net gain and does not have an unacceptable adverse impact on landscape character and historic environment and the unique and special characteristics of the South Downs National Park”. This is in recognition that development can impact landscape character and the historic environment, but this need not be unacceptable.</p> <p>Moreover, we consider that an amendment to Criteria vii of the same objective is required, and propose that it to be revised to state “Maximise the use of low carbon infrastructure and construction methods and drainage systems and encourage the use of locally sourced materials, where possible, to protect the integrity of the</p>

	<p>natural systems and resources”. The additional wording recognises that flexibility needs to be applied to the particular circumstances of a development.</p> <p>The Vision and Objectives should be inserted within the Strategic Policy SP1 itself in a succinct form. Presently the policy cross references to supporting text which is not a statutory part of a plan and has a purpose for setting the context and justification for a policy. Whilst it is important for the plan to have ambition it is necessary that the vision and objectives are practical, affordable and feasible and therefore the theme of deliverability should also be an emphasis of this overarching policy.</p> <p>Alongside growth in other parts of the district, market towns and villages need to be able to grow to support the shops, services and facilities that they offer existing and future residents. The Vision and the plan should take forward this aim to ensure that the market towns and villages are allowed to grow in the period up to 2040. The plan, as currently drafted does not allocate sufficient housing at settlements such as Wickham, a Larger Rural Settlement to support their sustainability. Bloor Homes does not consider that the ambitions of Policy SP1 will be delivered with the ability to address the housing needs of the area and enhance the sustainability of communities compromised. As drafted, the plan cannot therefore be found sound. In the particular case of Wickham, whilst we support the draft allocation at Mill Lane (draft Policy WK5), we consider that this allocation should be expanded to encompass the Land at Junction of Mill Lane, Wickham (WI06). This forms part of the masterplan previously promoted and would increase the total number of units from 40 to approximately 100. This modest level of additional growth in this location would still enable Wickham to retain its identity and would not unacceptably impact its heritage or rural character. It would also contribute to the significant level of unmet need within the Partnership for South Hampshire area and to the requirement for additional housing provision under the proposed amended standard method.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Bloor Homes support in principle the approach set out in Policy SP1 in particular the need to deliver the aspirations for each sub-area. It should also be acknowledged that the revised standard method proposed by the new Government will further increase housing requirements in Winchester. Bloor Homes supports the recognition at paragraph 2.12 that the ability to provide affordable housing is influenced by whether a site is greenfield or brownfield and whether there is a need to mitigate the impacts of nitrogen and/or phosphorous. It should be recognised within this paragraph that there are other potential costs that can affect the viability of developments, for example, site-specific infrastructure costs and abnormal costs. The NPPF and NPPG suggest that a typology approach is taken to the assessment of viability. Whilst this approach is acknowledged, it must equally be acknowledged that every site is different and there may be a need for site specific viability assessments, as identified at Paragraph: 006 Reference ID: 10-006-20190509 of the NPPG.</p> <p>We recommend that Criteria iv under the Tackling the climate emergency and creating a greener district objective should be amended to read “Ensure that development is designed to provide biodiversity net gain</p>



	<p>and does not have an unacceptable adverse impact on landscape character and historic environment and the unique and special characteristics of the South Downs National Park”. This is in recognition that development can impact landscape character and the historic environment, but this need not be unacceptable. Moreover, we consider that an amendment to Criteria vii of the same objective is required, and propose that it to be revised to state “Maximise the use of low carbon infrastructure and construction methods and drainage systems and encourage the use of locally sourced materials, where possible, to protect the integrity of the natural systems and resources”. The additional wording recognises that flexibility needs to be applied to the particular circumstances of a development.</p> <p>The Vision and Objectives should be inserted within the Strategic Policy SP1 itself in a succinct form. Presently the policy cross references to supporting text which is not a statutory part of a plan and has a purpose for setting the context and justification for a policy. Whilst it is important for the plan to have ambition it is necessary that the vision and objectives are practical, affordable and feasible and therefore the theme of deliverability should also be an emphasis of this overarching policy.</p> <p>Alongside growth in other parts of the district, market towns and villages need to be able to grow to support the shops, services and facilities that they offer existing and future residents. The Vision and the plan should take forward this aim to ensure that the market towns and villages are allowed to grow in the period up to 2040. The plan, as currently drafted does not allocate sufficient housing at settlements such as Wickham, a Larger Rural Settlement to support their sustainability. Bloor Homes does not consider that the ambitions of Policy SP1 will be delivered with the ability to address the housing needs of the area and enhance the sustainability of communities compromised. As drafted, the plan cannot therefore be found sound. In the particular case of Wickham, whilst we support the draft allocation at Mill Lane (draft Policy WK5), we consider that this allocation should be expanded to encompass the Land at Junction of Mill Lane, Wickham (WI06). This forms part of the masterplan previously promoted and would increase the total number of units from 40 to approximately 100. This modest level of additional growth in this location would still enable Wickham to retain its identity and would not unacceptably impact its heritage or rural character. It would also contribute to the significant level of unmet need within the Partnership for South Hampshire area and to the requirement for additional housing provision under the proposed amended standard method.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a></p>

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

[Vision document \(Land At Mill Lane, Wickham\)](#)

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Brian Welch
<b>Personal reference number</b>	ANON-AQTS-32Z2-A
<b>Full reference number</b>	ANON-AQTS-32Z2-A/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>My immediate family have lived in Winchester since 1978, our daughters have been educated here and we try to contribute to and support the local community. I have spent a considerable time reading the various documents for the Local Plan, I have heard the advertisements on local radio inviting public contributions and read comments from the Leader of the Council to the effect that if we want to comment on individual issues in the District, the only effective way to do so is through the Regulation 19 Consultation. I must say therefore that the consultation document is comprehensive but not that easy for individuals to navigate and to find the right place on which to comment. The Council is clearly expecting to receive comments from businesses and organisations with interests in the district, and I cannot hope to match the depth of those responses. The Council should not measure the level of public comments as reflecting either satisfaction or otherwise with the plan, because it is not that easy to make comments. Although it is presumably a legal requirement, I am not in a position to say is the text and policy is Legally compliant, Sound, or if it complies with a duty to co-operate. The detail and depth of the proposed submission Local Plan is impressive, and I realise that it is probably in the form required by Central Government, but I shudder to think how much it has cost with similar exercises taking place throughout the Country, as well as the time and expense of the various organisations which have submitted their responses. I hope that it really is worthwhile.</p> <p>I know that it is important to try to plan for what the district and the country will look like in 2040, by which time, I will probably not be alive, but my daughters hopefully will</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

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

<b>Policy/Evidence base document</b>	SP1
<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-8/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>[Please see formatted submission sent by email]</p> <p>It appears that, with the exception of referring to '20 minute neighbourhoods' instead of '15 minute neighbourhoods', the proposed Vision and Objectives are mainly unchanged from the previous consultation on the Local Plan. Crest Nicholson supports these objectives; particularly the following:</p> <ul style="list-style-type: none"> <li>• The recognition of the Partnership for South Hampshire (herein, "PfSH") area lying within the district as being functionally and spatially closely linked to the conurbation and the strategic importance of North Whiteley in this context.</li> <li>• The continuing role that the main MDA growth areas will perform through the plan period in supporting the conurbation is welcomed.</li> <li>• The approach set out within the vision to the planning of the Market Towns and Rural Areas (herein, "MTRA") policy designation, notably that this area is constrained by its rural character, and that functionally it should be concerned predominantly with responding to locally arising housing needs where it is possible to do this in ways that protect the important rural setting of settlements, particularly where this is in close proximity to the South Downs National Park.</li> <li>• The reference within the Vision to further growth at Whiteley. As discussed within our representations to Policy SH2, this will make a valuable contribution towards delivering sustainable development within Winchester.</li> </ul> <p>Overall, the objectives outlined cover four general themes that collectively address the three objectives of sustainable development set out within the Framework. It is demonstrated within our representations to Policy SH2 how the additional allocated growth at the North Whiteley MDA will contribute towards the delivery of these.</p>
<b>What modification(s) are necessary to make the</b>	No changes.

<b>policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	No changes.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 1 (Policy SP1 comments)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Croudace Homes
<b>Personal reference number</b>	BHLF-AQTS-328A-Q
<b>Full reference number</b>	BHLF-AQTS-328A-Q/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website.</p> <p>Policy SP1 confirms that the Council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development.</p> <p>We largely support the Vision for Winchester District over the plan period. Whilst we acknowledge that it sets out that the market towns and rural settlements will remain attractive settlements to support evolving communities and the economy, we encourage the Council to allow such settlements which are sustainable to deliver appropriate growth as opposed to 'modest' growth which suggests growth in these sustainable settlements will be limited and not ambitious, as required by the National Planning Policy Framework (NPPF).</p> <p>The objectives set out to deliver the vision are supported. In particular, the objective to provide homes for all is key to ensure that the Local Plan delivers high quality new housing to meet identified local needs.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

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



<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Croudace Homes (Alison Walker)
<b>Personal reference number</b>	BHLF-AQTS-32QZ-9
<b>Full reference number</b>	BHLF-AQTS-32QZ-9/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>It is unusual that a policy in a plan should require development proposals to demonstrate how they contribute to and meet the vision and objectives of the plan. A vision leads to a plan objectives, which should then inform both the SA or IA, and then appear threaded and embedded into the very wording of policy. The vision and objectives are not on their own policies for the purpose of decision making. The onus should be placed on the Council in its review of the success and function of policies within the regular review periods (Annual Monitoring Statement, for example) to evaluate whether the objectives of the plan are being met and update and review policies as appropriate.</p> <p>It is of concern that the Council considers the vision and objectives of the plan to hold policy weight and that this policy will be monitored by the number of planning applications that are refused permission that do not meet the vision and objectives of the plan. Plans should be pro-development, pro-growth, pro-sustainable development and it seems contradictory to Government Policy that this policy should be measured by the number of refusals and appeals. It is Croudace's opinion that this policy should be removed from the Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a> <a href="#">Supporting document 1 (Vision Document)</a> <a href="#">Supporting document 2 (Map - Land east of Highbridge Road, Colden Common)</a> <a href="#">Supporting document 3 (Indicative layout)</a></p>
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<b>Policy/Evidence base document</b>	SP1
<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/6/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We understand that the Local Planning Authority (LPA) are currently undertaking further air quality assessment work with the support of Natural England. There remains a possibility that this issue will still be resolved. However, at the time of responding, the results of the assessment work were not available. In light of this, we advise that the Local Plan does not currently pass the tests of soundness described in Paragraph 35 of the National Planning Policy Framework (NPPF). The reasons for which are set out within our formal response dated 11/10/2024 (Our Ref: 487013) - see additional PDF for further information and appendix
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</a> <a href="#">Form (commenting on Air Quality only)</a>

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	English Oak Care Homes
<b>Personal reference number</b>	BHLF-AQTS-32EJ-D
<b>Full reference number</b>	BHLF-AQTS-32EJ-D/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Policy SP1 confirms that the council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development.</p> <p>We largely support the Vision for Winchester District over the plan period. The objectives set out to deliver the vision are supported. In particular, the objective to provide homes for all is key to ensure that the Local Plan delivers high quality new housing to meet identified local needs, including older persons' and specialist housing. The Need and Demand report submitted together with these representations demonstrates that there has been, and will continue to be a significant increase in the aging population and in particular people requiring dementia care, as such we believe the vision and objectives of the Local Plan should reflect this changing demographic. see supporting information for further details</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>	Yes <a href="#">Form (referring to letter)</a>

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

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

[Supporting document 1 \(need/demand report for Oak Care Village\)](#)

<b>Policy/Evidence base document</b>	SP1
<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/3/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Statement of Common Ground and the Duty to Cooperate  As set out in the August 2024 Statement of Common Ground made between Fareham Borough Council and Winchester City Council, Fareham Borough Council welcomes Winchester City Council's intention to meet their own housing need within the district and also supports the contribution being made towards accommodating the unmet need within the wider Partnership for South Hampshire (PfSH) area. The councils have made a commitment to continue to work together to address strategic and cross boundary matters.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Letter (commenting on policies)</a>

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



<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Introduction (paragraph 2.5): NPPF paragraph 22 sets out that “Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Paragraph 2.5 confirms that the Local Plan covers a period up to 2040, extended from the Reg 18 Plan which looked forward to 2039. The Winchester Local Plan timetable as published on the website expects submission of the Local Plan between October to December 2024, and adoption of the plan a year later between October and December 2025. Whilst these optimistic timescales are commended, the Council has allowed for no buffer should the examination process be extended. Adoption of the plan post December 2025 will mean the policies do not look forward to a minimum 15-year period.</p> <p>The Local Plan has therefore not been positively prepared in the context of NPPF paragraph 22. The plan period should be extended in light of this. The District is located within the Partnership for Urban South Hampshire (PfSH) spatial planning area. In December 2023, PfSH published a Spatial Position Statement (SPS) 2023 which sought to help inform the preparation of and strategic co-ordination of local plans. The SPS has been prepared in line with the NPPF to establish and distribute the objectively assessed needs for housing and economic growth. The SPS provides an overall vision and strategic direction for new development up to 2050. The SPS underpins the assessment of your Local Plan under NPPF paragraphs 24 to 27.</p> <p>Given the District’s ability to contribute significantly towards the demonstrable unmet strategic housing needs of this area (as discussed later in these representations), the plan period should be extended to align with the PfSH Spatial Position Statement December 2023 to 2050. Strategic Policy SP1 ‘Vision and Objectives’: The vision and objectives must not be elevated to a strategic policy in their own right. Instead, their purpose is to define the strategic and non-strategic policies of the Local Plan and demonstrate linked themes. Not all objectives will be relevant to all proposals. The policy does not identify how any failure to ‘contribute towards’ an objective or how the delivery of a neutral position will be reacted to by a decision-maker.</p>

	<p>Notwithstanding the above, the vision and objectives fail to adequately recognise the strategic context of the district. Reference should be made within the vision (at the second bullet point) and housing objective iv) to the duty to cooperate and significant PfSH unmet needs, as this will set the scene for the growth identified in Strategic Policy H1 and beyond.</p> <p>Objective iv) is currently narrowly focused to “meet local needs” instead of delivering that and understanding how unmet needs can be accommodated. The objective should be amended to “meeting the needs of the wider community” in recognition of the strategic context.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Extend plan period to recognise the district’s location within the PfSH spatial area and the Spatial Position Statement December 2023 which underpins the assessment of your Local Plan under NPPF paragraphs 24 to 27.</p> <p>Amend SP1 to recognise the strategic context of the district at bullet point 2 of the vision and objective iv. Amend objective iv) to refer to the needs of the wider community.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Extend plan period to recognise the district’s location within the PfSH spatial area and the Spatial Position Statement December 2023 which underpins the assessment of your Local Plan under NPPF paragraphs 24 to 27. Amend SP1 to recognise the strategic context of the district at bullet point 2 of the vision and objective iv. Amend objective iv) to refer to the needs of the wider community.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p><a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a></p> <p><a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a></p> <p><a href="#">Supporting document 2 (Location Plan)</a></p> <p><a href="#">Supporting document 3 (Concept Plan)</a></p> <p><a href="#">Supporting document 4 (Illustrative masterplan)</a></p> <p><a href="#">Supporting document 5 (Access and Transport Report)</a></p> <p><a href="#">Supporting document 6 (Landscape and visual study)</a></p> <p><a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a></p> <p><a href="#">Supporting document 8 (Interim Ecology Assessment)</a></p> <p><a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a></p> <p><a href="#">Supporting document 10 (Statutory Biodiversity Metric)</a></p> <p><a href="#">Supporting document 11 (Preliminary Noise and Vibration Summary)</a></p> <p><a href="#">Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</a></p>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Gleeson Land
<b>Personal reference number</b>	ANON-AQTS-3299-G
<b>Full reference number</b>	ANON-AQTS-3299-G/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Vision - The spatial strategy for the local plan as articulated in the vision is focused on three key areas, the county town of Winchester, South Hampshire urban areas and market towns and rural villages. The vision states that “the market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities...”. Whilst this vision is positive, it will only be achieved if the right sites are allocated for development. We have concerns about relying solely on the allocation of Morgans Yard in Waltham Chase as set out elsewhere in our representations.</p> <p>Objectives - Living well - Objective ii seeks to deliver “inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure, blue/green infrastructure and employment.” However, it will not be possible to deliver any change for rural communities in the south of the district, of any scale, if sufficient development is not permitted there to facilitate new and improved infrastructure. The development of SHELAA site reference SWA05 for example would deliver significant blue/green infrastructure and a natural extension to the Swanmore Recreation Ground, to the benefit of the settlements of Swanmore and Waltham Chase.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Graham Tuck
<b>Personal reference number</b>	BHLF-AQTS-3262-6 - Eastleigh Borough Council
<b>Full reference number</b>	BHLF-AQTS-3262-6 - Eastleigh Borough Council/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Eastleigh Borough Council agreed a Statement of Common Ground with Winchester City Council in September 2024. Eastleigh Borough Council has no further comments it wishes to make on the reg. 19 Winchester Local Plan
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (commenting on policy)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/1/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>SEE PDF FOR ADDITIONAL INFORMATION ON LEGAL COMPLIANCE AND SOUNDNESS TESTS</p> <p>It is unusual that a policy in a plan should require development proposals to demonstrate how they contribute to and meet the vision and objectives of the plan. A vision leads to a plan objectives, which should then inform both the SA or IIA, and then appear threaded and embedded into the very wording of policy. The vision and objectives are not, on their own policies, for the purpose of decision making. The onus should be placed on the Council in their review of the success and function of policies within the regular review periods (Annual Monitoring Statement, for example) to evaluate whether the objectives of the plan are being met and update and review policies as appropriate.</p> <p>It is of concern that the Council consider the vision and objectives of the plan to hold policy weight, and that this policy will be monitored by the number of planning applications that are refused permission that do not meet the vision and objectives of the plan. Plans should be pro-development, pro-growth, pro-sustainable development and it seems contradictory of Government Policy that this policy should be measured by the number of refusals and appeals. It is Harding Holding's firm opinion that this policy should be removed from the Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Hathor Property
<b>Personal reference number</b>	ANON-AQTS-32T7-9
<b>Full reference number</b>	ANON-AQTS-32T7-9/3/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Local Plan Vision and objectives My client supports the Local Plan Vision and in particular that the market towns and rural villages will accommodate changes to support evolving communities and the economy, with modest growth to meet their needs to support local services and facilities whilst retaining their identity and character. Similarly the related objectives at paragraph 3.6 are well considered. However, my client would stress the importance of demonstrating the imposition of LETI standards for residential development will not adversely affect viability. It is acknowledged that significance evidence has been presented to justify this approach.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a>



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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Ibex Homes Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QE-M
<b>Full reference number</b>	BHLF-AQTS-32QE-M/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Strategic Policy SP1- Vision and Objectives</p> <p>OBJECT It is unusual that a policy in a plan should require development proposals to demonstrate how they contribute to and meet the vision and objectives of the plan. A vision leads to a plan objectives, which should then inform both the SA or IIA, and then appear threaded and embedded into the very wording of policy. The vision and objectives are not, on their own policies, for the purpose of decision making. The onus should be placed on the Council in their review of the success and function of policies within the regular review periods (Annual Monitoring Statement, for example) to evaluate whether the objectives of the plan are being met and update and review policies as appropriate.</p> <p>It is of concern that the Council consider the vision and objectives of the plan to hold policy weight, and that this policy will be monitored by the number of planning applications that are refused permission that do not meet the vision and objectives of the plan. Plans should be pro-development, pro-growth, pro-sustainable development and it seems contradictory of Government Policy that this policy should be measured by the number of refusals and appeals. It is Ibex's firm opinion that this policy should be removed from the Plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Imogen Zoe Dawson
<b>Personal reference number</b>	ANON-AQTS-32MD-F
<b>Full reference number</b>	ANON-AQTS-32MD-F/1/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>My comments made to the Cabinet Meeting on 19th August 2024 as follows:</p> <p>This is an ambitious plan for the future of Winchester. Reading the 3000 page document, was a challenge especially to evaluate the 'balance' of choices as there were negatives as well as positives in many of the policies outlined to mitigate the declared and on-going Climate and Nature Emergencies. Infrastructure is the key to success and likely to be the factor which will slow the rate of progress in implementing it during the time-span allocated.</p> <p>Good clean reliable water supplies and sewage/waste facilities and infrastructure (which to date Southern Water has not delivered ) will also be needed for new developments of all kinds. National Grid infrastucture is struggling to provide electricity needed for re-charging electric vehicles. Economic growth is being inhibited particularly in rural areas by poor mobile phone signals and internet connections, infrastructure by private providers needs to be improved. Unless we have an integrated public transport plan which will involve full co-operation and agreement with third parties from private rail and bus companies to public authorities, we will not be able to link rural and urban areas effectively and reduce travel by privately owned transport. Thus targets to reduce traffic and congestion, as well as air and noise pollution and damage to the natural environment will be difficult to achieve.</p> <p>A good public transport network is essential for economic growth. Many people who support our essential services plus the majority who work in the hospitality and retail sectors do not earn enough to afford to rent or buy a dwelling in our area which is within walking distance of their place of work, and will look elsewhere. All infrastructure mentioned needs to be in place together with provision for shops, services and public open space for large new housing developments when residents move in. Small housing developments within easy walking distance of existing shops and services should be dedicated to social housing and also dwellings for elderly residents an increasing percentage of the population here) and have gardens. Ambitious re-development schemes relying only on private investment will fail or be sub-standard, as has been shown in the past. Neither WCC nor HCC have the resources to fund these so unless central</p>

	<p>government comes up with the money we might end up with the scenario where superficially everything might change but the underlying problems will remain the same or get even worse.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>My comments made to the Cabinet Meeting on 19th August 2024 as follows:</p> <p>This is an ambitious plan for the future of Winchester. Reading the 3000 page document, was a challenge especially to evaluate the 'balance' of choices as there were negatives as well as positives in many of the policies outlined to mitigate the declared and on-going Climate and Nature Emergencies. Infrastructure is the key to success and likely to be the factor which will slow the rate of progress in implementing it during the time-span allocated.</p> <p>Good clean reliable water supplies and sewage/waste facilities and infrastructure (which to date Southern Water has not delivered ) will also be needed for new developments of all kinds. National Grid infrastructure is struggling to provide electricity needed for re-charging electric vehicles. Economic growth is being inhibited particularly in rural areas by poor mobile phone signals and internet connections, infrastructure by private providers needs to be improved. Unless we have an integrated public transport plan which will involve full co-operation and agreement with third parties from private rail and bus companies to public authorities, we will not be able to link rural and urban areas effectively and reduce travel by privately owned transport.</p> <p>Thus targets to reduce traffic and congestion, as well as air and noise pollution and damage to the natural environment will be difficult to achieve. A good public transport network is essential for economic growth. Many people who support our essential services plus the majority who work in the hospitality and retail sectors do not earn enough to afford to rent or buy a dwelling in our area which is within walking distance of their place of work, and will look elsewhere. All infrastructure mentioned needs to be in place together with provision for shops, services and public open space for large new housing developments when residents move in. Small housing developments within easy walking distance of existing shops and services should be dedicated to social housing and also dwellings for elderly residents an increasing percentage of the population here) and have gardens.</p> <p>Ambitious re-development schemes relying only on private investment will fail or be sub-standard, as has been shown in the past. Neither WCC nor HCC have the resources to fund these so unless central government comes up with the money we might end up with the scenario where superficially everything might change but the underlying problems will remain the same or get even worse.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	

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

<b>Policy/Evidence base document</b>	SP1
<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-5/3/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	I agree with the overall policy objectives and vision, but disagree with their implementation in parts of this current proposal. 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.
<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>	See other consultation comment sections: The land west of Courtenay Road should be included within policy NE10 – Protecting Open Areas. These are open areas within defined settlement boundaries which have an important amenity, biodiversity, heritage or recreational value which are given protection from development.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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



<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Keith Hearn
<b>Personal reference number</b>	ANON-AQTS-3BAF-N
<b>Full reference number</b>	ANON-AQTS-3BAF-N/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I strongly believe the closure and diversion of Andover Road via the new build of Kings Barton estate is short sighted more so with the development of St. John Moores Barracks. Most Fridays the A34 & the A303 including Junction 9 are blocked due to accidents and traffic is diverted via Andover Road into the city if Andover road is diverted the Kings Barton estate will be foolhardy. Also there is a strong possibility Littleton village will become a short cut and already heavy trucks cut through the village where the main road is narrow and trucks are mounting the pavements and cutting up verges to pass parked vehicles in the village. I doubt if my thoughts are taken into consideration by WCC or HCC as the councils have no vested interest in what the public think
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Don not cut off Andover Road
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/13/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>General Comments for the whole Reg 19 Consultation - The Parish Council welcomes the opportunity to comment on the Regulation 19 Local Plan, however the Parish Council is extremely disappointed that there have been no substantive changes to the local plan in response to the comments it submitted at the Regulation 18 stage.</p> <p>The policy sets out Winchester City Council's (WCC) commitment to deliver its vision and objectives which includes engaging proactively with a range of partners. It provides the basis for working with organisations such as parish councils. The Parish Council welcomes the opportunity to contribute to the future planning of its area but any engagement must be such that the views of the local community are seen to be influencing decisions and not just a tick box exercise. Object Policy SP1 by explicitly stating: "... engage proactively with a range of partners, including parish councils, to jointly find solutions... "</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Increase the range of partners listed in the policy to refer to Parish Councils.
<b>What is your suggested wording or text for the policy?</b>	Amend policy to read "... engage proactively with a range of partners, including Parish Councils, to jointly find solutions... "
<b>Do you agree with how the 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)</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>	SP1
<b>Name of respondent (or client)</b>	Mark, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/3/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Local Plan Vision and objectives My client supports the Local Plan Vision and particularly that Winchester, as the cultural and economic centre of the district with a significant range of services, facilities and employment, will be the centre for growth. In addition, the concept of 20 minute neighbourhoods and ensuring that development is well located relative to facilities and services, including connected to public transport, rights of way and cycleways are also supported. Similarly the related objectives at paragraph 3.6 are well considered. However, my client would stress the importance of demonstrating the imposition of LETI standards for residential development will not adversely affect viability. It is acknowledged that significance evidence has been presented to justify this approach.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Martin Miller, tor&co Ltd (Formerly Terence O'Rourke Ltd)
<b>Personal reference number</b>	ANON-AQTS-32UM-Z
<b>Full reference number</b>	ANON-AQTS-32UM-Z/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Anchor Properties Ltd broadly agrees with the principles set out in the vision and objectives set out on pages 20 and 21 of the plan, and particularly the objective of delivering high quality and adaptable housing to meet local needs. However, we consider that the phrase "of all ages" should be added to objective criterion (iv) after "local needs" so that it is very clear that this vision applies to older persons housing as much as general needs housing. Furthermore, as currently drafted, policy SP1 refers to supporting text of the plan, which has the purpose of setting the context and justification for the policy. In our opinion, policy SP1 should include the plans' objectives too.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	As set out above, the phrase "of all ages" should be added to objective criterion (iv), and the policy wording should be amended to refer directly to the vision and objectives.
<b>What is your suggested wording or text for the policy?</b>	Supporting text: '...Homes for All iv. Delivering high quality and adaptable new housing to meet local needs for all ages, including a range of sizes, types of residential accommodation and tenures. ...'  Strategic Policy SP1 Vision and Objectives The council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development that is focused around sustainable travel modes of transport and will use available tools at its disposal in order to unlock sites which are key to the Plan's delivery. The Plan will meet the aims set out in the Vision and Objectives by ensuring that new development contributes towards them as follows – Vision Development proposals should demonstrate that they contribute towards, and are compatible with, the overall aims of the Plan as set out in the vision and deliver the aspiration for each sub-area. Objectives Development proposals should demonstrate how they contribute towards the four objectives of the Plan: <ul style="list-style-type: none"> <li>• Tackling the climate and nature emergencies and creating a greener district</li> <li>• Living Well</li> <li>• Homes for All</li> </ul>

	<ul style="list-style-type: none"> <li>Vibrant Local Economy</li> </ul>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	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>	SP1
<b>Name of respondent (or client)</b>	Martin Tadeu Rodrigues
<b>Personal reference number</b>	ANON-AQTS-3BM7-J
<b>Full reference number</b>	ANON-AQTS-3BM7-J/1/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	I and my wife are appalled that you are considering closure of Andover Road into the city in preference of diverting all the traffic, including buses, trucks and lorries, into the Barton Farm residential area (Cala Homes). This detour not only is narrower but also has homes with elderly persons and children traversing it with just narrow pavements. It makes no sense doing a detour when you have a much wider road of Andover Road and with footpaths alongside it.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	You need to retain Andover Road into the city centre as the main roadway and not consider its closure.
<b>What is your suggested wording or text for the policy?</b>	Andover road to be retained as the main roadway into Winchester City if the St John Barracks project is given the go ahead.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP1
<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/10/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>During the Local Plan process the ICB has been engaged with the proposed site allocations and assessed the existing primary care infrastructure capacity. The ICB have advised that the GP practices within the Winchester City Council area are already operating beyond their patient capacities. The current primary care infrastructure capacity can support a maximum of 112,898 patients, however the number of patients registered exceeds 131,000, therefore there is insufficient capacity to accommodate the proposed developments.</p> <p>The ICB supports the Local Plan vision (Page 19) which highlights the need for ongoing enhancement and sustainability of local communities to address the needs of the area. Access to health care services has an important role to play in ensuring that this vision is met, and we note the commitment that physical and social infrastructure will need to be provided to reinforce and maintain a strong sense of community and identity. The vision also states that for the market and rural towns to remain attractive settlements then there is a need to underpin the resilience of local services and facilities.</p> <p>The corresponding Living Well objective (Page 21, ii) follows on from the vision stating that the plan will deliver inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure. Access to sustainable and accessible GP services are not only important to the local population but also a vital facility that is used by the whole community and will be a key component to the Local Plan Vision and Objectives.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Mr N Craig-Harvey
<b>Personal reference number</b>	BHLF-AQTS-32ED-7
<b>Full reference number</b>	BHLF-AQTS-32ED-7/1/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Development of the site at Dean Down Drove would meet the vision and objectives of this policy and would deliver a high quality sustainable and inclusive development over the plan period. It is disappointing to see that this site has not been included in the allocations when it provides a fantastic opportunity to expand the settlement of Littleton in a sympathetic manner. It would result in a logical extension to the existing settlement boundary by a small proportion, to the south east. This would follow the natural pattern of existing development along Dean Down Drove and would not harm the rural character of the settlement.</p> <p>Land at Dean Down Drove - THE OPPORTUNITY– SUMMARY</p> <ul style="list-style-type: none"> <li>• The site is available for development now (within 0-5 years)</li> <li>• The development of this site for residential dwellings would promote the viability and vitality of Littleton, whilst maintaining the rural character of the village</li> <li>• The site presents a suitable infill development opportunity site within an existing ribbon of continuous development on the north side, fronting onto Dean Down Drove.</li> <li>• The size and scale of the site would meet the requirements of Paragraph 70 of the NPPF, being “no larger than one hectare”. It should therefore form “at least 10%” of the housing requirement on sites proposed for allocation under the new draft plan.</li> <li>• The whole site could include more than 20 homes at a density appropriate to the existing built form and the surrounding area.</li> <li>• The site has been designed to include an appropriate number of affordable housing units.</li> <li>• The site does not encroach on the local gap (policy CP18)</li> <li>• There is surplus area on the northern section of the site to provide for BNG.</li> </ul> <p>The land at Dean Down Drove measures 0.96ha and is located on the south west of Littleton, with direct access onto Dean Down Drove (30mph speed limit). It is approx. 0.5km from the village centre, 2.5km from Winchester town centre and 1.2km from the nearest services, shops, schools, surgery and facilities. There is</p>

	<p>a bus stop where Dean Down Drove meets the main road (north east). It is a parcel of land nestled between two residential properties (Apley House and Ponthilly) and rises gently to the north. It is an obviously suitable infill development site within a ribbon of continuous development fronting onto Dean Down Drove. The site lies immediately adjacent to the existing settlement boundary for Littleton . The gap between Harestock and Littleton is located to the south east (Policy CP18). An extract from the Winchester North and Littleton proposals map (Development Management and Site Allocations (LPP2) is shown below:</p> <p>The site has potential for development of more than 20 homes, at a density appropriate to the existing built form and the surrounding area. It would also be possible to accommodate a new safe vehicular access, direct from Dean Down Drove. The area in the north west section of the site would provide for BNG. Potential layout of residential development and new access. In accordance with the definition of ‘deliverable’ within the NPPF (2023), the site is available for development now, is in a suitable location for future residential development and is achievable. It should therefore be considered a realistic allocation as housing could be delivered within the next five years. The site could satisfy 2 of the key issues of the district as set out in paragraph 9.8: "housing affordability" and "housing for all sectors of the community" by including affordable housing units in the middle of the community.</p> <p>This land at Dean Down Drove would meet the size threshold of Paragraph 70 of the NPPF which recognises the “important contribution” small sites make to meeting housing requirements and the speed of delivery compared to larger sites. Councils are encouraged to “promote the development of a good mix of sites” and should identify “at least 10% of their housing requirement on sites no larger than one hectare”. There is no reason why sites such as this land at Dean Down Drove, which can be started immediately, should not be included. Paragraph 72 of the NPPF acknowledges that Local Planning Authorities can make an allowance for windfall sites in the five-year housing land supply and any windfall allowance should have regard to the SHELAA, historic windfall delivery rates and expected future trends.</p> <p>The pressure to deliver windfall housing can have a potentially harmful impact on smaller settlements, such as Littleton. New site allocations should be appropriately located to enhance and conserve the existing character of settlements. Land at Dean Down Drove, due to its size and scale, is considered more appropriate to the existing scale and character of Littleton as opposed to the larger scale sites coming forward in the spatial area, such as Sir John Moor Barracks which would potentially encroach on the local gap (policy CP18) and lead to a sprawling effect.</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="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (commenting on policies and site promotion)</a>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Mr Roger Lawes
<b>Personal reference number</b>	BHLF-AQTS-32EP-K
<b>Full reference number</b>	BHLF-AQTS-32EP-K/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>In my view the proposed submission document is unsound as it fails to articulate a clear and understandable vision for the District; has no clear objectives about how that vision is to be achieved; or a succinct, coherent and comprehensive set of land use planning policies to put the plan into effect.</p> <p>I appreciate that there are often conflicting views about the role of “vision” and “objectives” in plan making and how best they should be defined but there can be no debate about how policies should be framed. Many are so conditional and so wordy that it is not easy to fathom what outcomes are being targeted. The policies in the Plan focus on controlling the new. However, at the end of the plan period the majority of development will comprise what is here today: new development will only be a small incremental addition. It is therefore a major omission that the Plan is silent about managing development and change in the existing stock. Nowhere is there an assessment of the potential outcomes from permitted development and how these must be mitigated if the climate emergency is to be addressed in any meaningful way.</p> <p>It is a major omission that the Plan fails to acknowledge that new national planning guidance will soon be handed down and the impact that might have. The current plan is predicated on continuing to accommodate the consequences of historic planning policies. The City Council must surely have a view on the impact of continuing that trend and what it means for future land-use planning in the district? I am not convinced that anyone benefits from the continuing uncertainty over the longer term patterns of development in the district: certainly not those striving to plan for and provide services and infrastructure</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The concept of Neighbourhood Plans is worthy. The context for their deliberations should, however, be more than just a number of additional houses. These plans will attempt to interpret the strategic policies in the Plan. To ensure that there is a consistent interpretation across the District (how, for example, will changes to the settlement boundary be determined) it is essential that the strategic briefs for the exercises provided by the City Council form part of the submitted plan and guidance provided on the various environmental and other assessments that will be required</p>



<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As a resident of Alresford it concerns me that the Plan is already out of date as far as the Sun Lane development is concerned. Permissions were granted some time ago which makes the text inconsistent. Moreover references to “safe parking and drop off” for those using the Sun Hill schools (paragraph 14.37) is surely at odds with the whole concept of weaning the community from reliance on their cars?</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/2/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Blenheim Strategic Partners ('BSP') welcome the commitment contained in Policy SP1 to 'engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development.' In addition, BSP equally support the acknowledgement within SP1 that the council must use available tools at its disposal in order to unlock sites which are key to the Plan's delivery. However and in this context, it is considered that the plan, as currently drafted, fails to deliver in this respect. In particular the policy lacks clarity over the vision to "address the needs of the area...and respond to the wider relationship with neighbouring areas." Instead of a positive and flexible response to this element of the vision, and requirements under the Duty to Cooperate (specifically related to the joint working through the Partnership for South Hampshire (PfSH)), the plan represents a restrained approach. Indeed the 'objectives' make no reference to delivering homes to accommodate the unmet needs of neighbouring areas, with a reference only to 'local needs' under objective iv). The same applies with respect to addressing affordability issues. Despite the chronic affordability challenge that Winchester is facing, there is no mention in either the vision or objectives to addressing affordability, more generally over and above the delivery of affordable housing, despite the clear acknowledgement (in the Foreward) of the challenge of affordability.</p> <p>Given that Policy SP1, gives effect to both Vision and Objectives, by requiring development proposals to contribute to, and be compatible with, them, it is imperative that they fully reflect both the need to address the stated affordability issues, and need to assist with accommodating some of the wider sub-regional unmet housing needs (beyond local housing needs), under the DtC.</p> <p>Dealing with cross-boundary matters is a fundamental part of plan preparation and central to the test of soundness and yet, despite the PfSH Common Ground and Spatial Position Statement, it is clear that Winchester has not undertaken ongoing or constructive engagement with specific neighbouring authorities to consider how unmet needs can be accommodated, in accordance with the NPPF (e.g. paras 11 b), 26 &amp; 61) and DtC. Specifically, the Council has failed to respond positively to the direct requests of both Portsmouth and Havant councils. The collective request from both neighbouring authorities, amounts to 7,886 homes (4,377 from Portsmouth, less 800 provided for in the Fareham plan, and 4,309 from Havant).</p>

	<p>Winchester has failed to consider this scale of need, and the opportunities that exist to accommodate it – in accordance with NPPF paragraph 11 b). Instead, they have identified an ‘allowance’ which appears to be derived from the previous (Reg 18) ‘buffer’ approach (see Housing Topic Paper paras 4.46 – 4.53) rather than an assessment of opportunities and potential capacity to meet such need. There are additional site opportunities available, within the parameters of the spatial strategy, which could be added to the supply to make a fuller response to the scale of the unmet need, but Winchester has constrained itself as a consequence of the buffer approach embedded in the Reg 18 plan and failure to properly review this response for the Reg 19 stage. This concerns reflects through the Integrated Impact Assessment (IIA), and reasonable alternatives considered, in that the IIA failed to consider alternatives that would help to address unmet need, including with reference to geographical considerations (noting that the PfSH area only covers the southern part of the district). As a consequence, there is no clarity to the strategy, it is not positive, effective or justified. Further, the DtC has not been demonstrated. Notwithstanding the above points (both further addressed under our responses to SP2, H1 and H2), it is clear that the local housing need, as calculated by the standard methodology, both for Winchester and for the PfSH area is increasing. Whilst the Council has rushed to consult on the Reg 19 plan, and submit it to take advantage of transitional arrangements, it is clear that the Council is not going to meet one of its key objectives of ‘homes for all’.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>For clarity and transparency, without ambiguity, a change to Policy SP1 is required to make an explicit reference to addressing affordability, meeting local needs and helping to meet the unmet needs of the sub-region under the DtC. Further, the policy should be modified to make it clear that the plan is flexible and responsive to changing needs according to the NPPF paragraph 11.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The following wording should be added to the policy (with corresponding amendments to the supporting text, vision and objectives) to ensure compliance with NPPF paragraph 11. The council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development that is focused around sustainable travel modes of transport and will use available tools at its disposal in order to unlock sites which are key to the Plan’s delivery. The Plan will meet the aims set out in the Vision and Objectives by ensuring that new development meets local needs and helps to address unmet needs from neighbouring authorities, seeks to address affordability within the district, and facilitates a positive response to changing circumstances, contributing toward them as follows - ....”</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>No</p>

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	OWEN JONES
<b>Personal reference number</b>	BHLF-AQTS-326Y-D
<b>Full reference number</b>	BHLF-AQTS-326Y-D/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Hallam Land have land interests at Denmead which are suitable to providing new housing. Policy DEN1 of the consultation document intends that the Neighbourhood Plan allocates land for about 100 dwellings, including any required amendments to the settlement boundary. The role and quantum of new housing directed to Denmead is of course framed by the consultation document's overall approach to housing provision. In this regard, where a higher housing requirement is necessary, a greater amount of housing could justifiably be direct to Denmead. The Neighbourhood Plan group are presently consulting on options that could together provide at least 300 new homes.</p> <p>Our representations are prepared in this context. Vision, Objectives and Strategic Policy 1. The consultation document is to be read as a whole; paragraph 2.5 emphasis this in bold text. Its Housing for All objective comprises: "Delivering high quality and adaptable new housing to meet local needs, including a range of sizes, types of residential accommodation and tenures." (emphasis added). Strategic Policy SP1 states that: "The council is committed to the delivery of the vision and objectives of the Plan and that "The Plan will meet the aims set out in the Vision and Objectives..." (emphasis added) This is germane to how the consultation document's policies and proposals should be measures; do they in fact meet the aims of delivering new housing to meet local needs?</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Patrick Davies
<b>Personal reference number</b>	ANON-AQTS-32T4-6
<b>Full reference number</b>	ANON-AQTS-32T4-6/1/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The Council fails in its text and policy to meet the basic principles of a legally compliant, sound document because of the deliberate way it curtailed its timetable for producing its regulation 19 document following the General Election on 4th July. It did this in an attempt to avoid the proposed revisions to the NPPF. Special and extraordinary Council and Committee meetings were brought forward to August dates in the holiday season to achieve this. In addition further all councillor private meetings were held in advance of proper open meetings so a collusive document could be produced, acceptable to the 3 party political groups. No discussion then took place on major issues at the open meetings. Furthermore there is no evidence that the Council took any steps to co-operate with its neighbouring local authorities affected by the Government's housing proposals of 30th July.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	It needs to be withdrawn.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	No

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



<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Peter Walker
<b>Personal reference number</b>	ANON-AQTS-3BAW-6
<b>Full reference number</b>	ANON-AQTS-3BAW-6/2/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The City Council has discounted the Kings Barton Residents' Association petition asking for Andover Road to be re-opened on a technicality. There is much in the policy statement that Kings Barton Residents' Association and I disagree with.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The opportunity to maintain Andover Road open for traffic in the future needs to be included in the design of the planned Andover Road closure. This closure should be designed in such a way that Andover Road can be readily re-opened to traffic as part of the planning approval for Sir John Moore Barracks or any further redevelopment in North Winchester
<b>What is your suggested wording or text for the policy?</b>	Whilst Andover Road is to be closed to traffic as part of the plan for the development, the closure should be designed in such a way that Andover Road can be re-opened as part of the permission for the Sir John Moore Barracks Re-development
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Richard Doughty
<b>Personal reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council
<b>Full reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council/2/SP1
<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 prioritises protecting our natural environment. Acknowledging that we are surrounded by beautiful green spaces and countryside. Whilst we recognise the challenge of finding affordable housing, we agree with the 'brownfield first' approach of the plan. However, our Town has almost no unused brownfield land making this challenging.
<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>	Members of the Council commented that some of the statements made in the document may no longer be relevant or accurate. There was debate regarding certain statements where the Council was unsure of the accuracy of the statement but could not comment specifically. We recommend that the document is fact-checked thoroughly following the consultation.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP1
<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/20/SP1
<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 meets the current obligations on the local planning authority for housing development, while balancing this against protection of the countryside and the environment. Countryside and environmental protection need a high priority in all development plans.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	None.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP1
<b>Name of respondent (or client)</b>	Star Energy Group plc
<b>Personal reference number</b>	BHLF-AQTS-32YG-X
<b>Full reference number</b>	BHLF-AQTS-32YG-X/2/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Strategic Policies SP1, SP2 and SP3 make no reference to mineral development. There are no policies which set out the Council's response to minerals development within the proposed planning area. Furthermore, the proposed policies map does not include the adopted Mineral Safeguarding Areas and Mineral Consultation Areas. National Planning Practice Guidance is clear that Winchester City Council has an important role to play in safeguarding mineral resources and development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations 6 are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA. The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses.</p> <p>The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are more energy</p>

	intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.
<b>What is your suggested wording or text for the policy?</b>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA.</p> <p>The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses. The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are more energy intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	<p>Yes</p> <p><a href="#">Form (Commenting on policies and policies map)</a></p> <p><a href="#">Letter (Commenting on policies and policies map)</a></p>

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Steven Favell
<b>Personal reference number</b>	ANON-AQTS-323A-J
<b>Full reference number</b>	ANON-AQTS-323A-J/1/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The vision makes no mention of the significant impacts of being an educational centre with Universities and Winchester College drawing in transient populations that have no roots or 'ownership' of the city. There is little financial contribution directly in the form of council tax, but still a burden of cost carried by other residents (including disruption). The vast areas of land ownership of the Education bodies and the Church are not mentioned.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Is the survey here to invite comment or to discuss purely whether the submission is legal? Being legal does not make it right.
<b>What is your suggested wording or text for the policy?</b>	Requirement to manage and control the impact of disconnected, transient populations attracted by the Universities and Public schools. Also the land ownership and influences of the education establishments and the Church.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No



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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Sue Wood
<b>Personal reference number</b>	ANON-AQTS-3B4C-5
<b>Full reference number</b>	ANON-AQTS-3B4C-5/2/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	no comment
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	no comment
<b>What is your suggested wording or text for the policy?</b>	no comment
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	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>	SP1
<b>Name of respondent (or client)</b>	The Clay Family
<b>Personal reference number</b>	ANON-AQTS-32MY-4
<b>Full reference number</b>	ANON-AQTS-32MY-4/2/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy SPI confirms that the Council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development. We largely support the Vision for Winchester District over the plan period. Whilst we acknowledge that it sets out that the market towns and rural settlements will remain attractive settlements to support evolving communities and the economy, we encourage the Council to allow such settlements which are sustainable to deliver appropriate growth as opposed to 'modest' growth which suggests growth in these sustainable settlements will be limited and not ambitious, as required by the National Planning Policy Framework (NPPF).</p> <p>The objectives set out to deliver the vision are supported. In particular, the objective to provide homes for all is key to ensure that the Local Plan delivers high quality new housing to meet identified local needs.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	N/a
<b>What is your suggested wording or text for the policy?</b>	N/a
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/3/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Objectives Paragraph 3.6 explains that the Vision of the Plan will be delivered pursuant to a series of objectives set under four sub-headings:</p> <ul style="list-style-type: none"> <li>• Tackling the climate and nature emergencies and creating a greener district (7 objectives)</li> <li>• Living well (3 objectives)</li> <li>• Homes for all (1 objective)</li> <li>• Vibrant local economy (4 objectives)</li> </ul> <p>It is notable that the subheading relating to homes has only a single objective that lacks any real ambition and fails to acknowledge the deep-seated inequalities that exist within the local housing market and the profound affordability challenges that have prevailed in Winchester for decades. Paragraph 2.13 advises that the delivery of affordable housing remains a key priority of the Local Plan, yet the Vision and objectives do not reflect this. The inference is that ‘affordability’ is a recurring problem that has pervaded successive plans (and the evidence supports this), yet there remains a lack of positive intent within the Council to proactively tackle the issue, an approach which the 2040 Plan maintains. It is for this reason that there is a strong imperative to ensure that this plan is succeeded immediately by a new iteration prepared to reflect the revised standard methodology. This will ensure that local planning authorities are obligated to deliver levels of housing growth that tackle affordability in a more meaningful way, via targets that are derived using a stronger affordability multiplier, within an overall approach that directs homes to where they are most needed and are least affordable. Local Plan making in Winchester demonstrates that the capacity to accommodate significant housing growth exists if the obligation to allocate housing is mandated by Government (the Kings Barton MDA is such an example). It is therefore vital that there is a swift transition from the 2040 Plan to its successor, in accordance with the proposed reforms.</p> <p>Strategic Policy SP1 is not effective or justified insofar as it requires development proposals to demonstrate how they will deliver the ‘aspiration for each sub-area’ set by the Vision and in turn contribute towards the objectives of the Plan. It is too vague and wide ranging to be purposeful.</p>

	<p>To conform to the policy all development proposals/planning applications in Winchester would need to demonstrate how they would maintain the status of the city as the cultural and economic centre of the district with a significant range of services, facilities and employment, and help to attract a range of new uses as the role of the town evolves. They would also need to show how they would support the importance of the visitor and tourism economy, and the creative and education sectors. This is far too generic and could more appropriately be addressed by detailed topic specific policies later in the Plan.</p> <p>The Vision and the provisions of SP1 are such that it is unclear how development proposals should respond to the requirements of the Policy. The Vision is not sufficiently grounded so that measurable outcomes can be derived from it, hence the purpose and need for the policy are unclear. It would be more appropriate to require development proposals to be aligned, where relevant, with the Vision and Objectives of the Plan by demonstrating compliance with the more detailed policies that flow from the Vision and Objectives. The current construction wording of the policy could be deleted without affecting the robustness of the Plan. However, under the circumstances that prevail around the consultation exercise, and the likely timetable for submission of the 2040 plan there is an imperative to ensure that the development plan swiftly accords with the Government's objectives for the planning system.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Policy SP1 should be revised to include an immediate review mechanism, the requirements of which should be incorporated into the policy wording.
<b>What is your suggested wording or text for the policy?</b>	The Council is committed to delivering the objectives that underpin the Local Plan and recognises that to achieve this effectively it is vital that the policies and provisions within the development plan are up to date and reflect national objectives for the planning system. The Council will undertake an immediate review of the 2040 Plan upon its adoption, with an updated or replacement version of the Plan submitted for examination not later than 18-months from the adoption date of the 2040 Plan, and in any event no later than the end of December 2026. If an updated or replacement plan that accords with the provisions of the National Planning Policy Framework (NPPF) is not submitted in accordance with the timetable specified above, the policies in the 2040 Plan that relate to the supply of land for housing will be deemed to be out of date in accordance with the terms of paragraph 11 (d) of the NPPF.
<b>Do you agree with how the 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)</a>

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

[Supporting Document \(Planning for South Hampshire\)](#)

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Union4 Planning Ltd
<b>Personal reference number</b>	ANON-AQTS-32MQ-V
<b>Full reference number</b>	ANON-AQTS-32MQ-V/2/SP1
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	While we support the overall thrust of Policy SP1, we are concerned that as currently worded, this does not appear to set out a clear commitment to achieving sustainable development as required by the NPPF and does not commit to meeting the needs of the area. Paragraph 11 of the NPPF requires all plans to promote sustainable development that meets the development needs of the area, aligns growth and infrastructure and improves the environment and tackles climate change. We feel that the policy should be amended to reflect this commitment. It should include a statement that the 'Local Plan supports sustainable development and aims to meet the needs of the area in terms of housing, economy and services/infrastructure' (see attached statement)
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Positive commitment to meeting the needs of the area and achieving sustainable development under NPPF para 11 as above.
<b>What is your suggested wording or text for the policy?</b>	Positive commitment to meeting the needs of the area and achieving sustainable development under NPPF para 11 as above.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	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>	SP1
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates welcomes the aims of policy SP1, and supports the Council in its vision to deliver high quality sustainable and inclusive development.</p> <p>Wates is particularly pleased to note the reference to partnership working, which will be key if the overall quantum and scale of growth required by the area is to be achieved, especially if that scale is to increase under a new National Planning Policy Framework and as such may well require some flexibility and pragmatism from all parties.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a>

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

<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates welcomes the aims of policy SP1, and supports the Council in its vision to deliver high quality sustainable and inclusive development. Wates is particularly pleased to note the reference to partnership working, which will be key if the overall quantum and scale of growth required by the area is to be achieved, especially if that scale is to increase under a new National Planning Policy Framework and as such may well require some flexibility and pragmatism from all parties.</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="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a></p>
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<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/4/SP1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website.  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates welcomes the aims of policy SP1, and supports the Council in its vision to deliver high quality sustainable and inclusive development. Wates is particularly pleased to note the reference to partnership working, which will be key if the overall quantum and scale of growth required by the area is to be achieved, especially if that scale is to increase under a new National Planning Policy Framework and as such may well require some flexibility and pragmatism from all parties.</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="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies)</a></p>
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<b>Policy/Evidence base document</b>	SP1
<b>Name of respondent (or client)</b>	
<b>Personal reference number</b>	BHLF-AQTS-32YK-2 - Marine Management Organisation
<b>Full reference number</b>	BHLF-AQTS-32YK-2 - Marine Management Organisation/1/SP1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b>Marine</p> <p>Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans.</p> <p>The adoption of the North East, North West, South East, and South West Marine Plans in 2021 follows the adoption of the East Marine Plans in 2014 and the South Marine Plans in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management. Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a marine licence in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. We have produced a guidance note (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful.</p> <p>Consultation requests for development above MHWS If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:</p>



	<ul style="list-style-type: none"> <li>• The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a ‘development plan’ under the Planning and Compulsory Purchase Act 2004. Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.</li> <li>• It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.</li> <li>• If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.</li> </ul> <p>Minerals and Waste Local Plans and Local Aggregate Assessments</p> <p>If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:</p> <ul style="list-style-type: none"> <li>• The Marine Policy Statement (MPS), Section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK’s) construction industry.</li> <li>• The National Planning Policy Framework (NPPF), which sets out policies for national (England) construction mineral supply.</li> <li>• The minerals planning practice guidance which includes specific references to the role of marine aggregates in the wider portfolio of supply.</li> <li>• The national and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period, including marine supply.</li> </ul>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Email (consultation response - standing advice)</a></p>

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

**WCC Response:**

Comments noted.

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

**WCC Recommended Changes arising from the representations:**

No changes recommended.

Local Plan Reference or document	Policy SP2 Spatial Strategy and Development Principles	
Total Number of Representations received	74	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	31	29
Sound	14	52
Complies with Duty to Cooperate	27	34
<b>Summary of Representations</b>		
<p>The representations highlight several key issues, primarily focusing on spatial strategy, housing needs, and sustainable development. There is broad support for distributing development to Winchester Town and other areas but concerns about overall levels and the spatial strategy, with many suggesting that housing targets should be minimums to meet future needs. The need to prioritise sustainable development is noted, with calls for improved public transport to reduce car dependency and better infrastructure support for new developments. Housing affordability is a critical concern, with many respondents suggesting the proposed amount is insufficient. The feedback also stresses economic growth, advocating for healthcare and social infrastructure investments, addressing community well-being, and better aligning with broader development strategies. Critics highlight the need for the plan to adapt to national policy changes, incorporating flexibility to future-proof the plan given unmet housing need and the proposed revisions to the NPPF and standard method.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)  <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)  ANON-AQTS-3BCJ-U/1/SP2  ANON-AQTS-3BAW-6/3/SP2  <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/46/SP2</b>  ANON-AQTS-3BSY-T/59/SP2  <b>ANON-AQTS-3BFT-8 - Crawley Parish Council/6/SP2</b>  ANON-AQTS-3BPH-6/5/SP2  ANON-AQTS-3B4C-5/5/SP2  <b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/17/SP2</b>  ANON-AQTS-327T-9/1/SP2  ANON-AQTS-3291-8/6/SP2  ANON-AQTS-329C-T/1/SP2  ANON-AQTS-3B5A-4/6/SP2</p>		

ANON-AQTS-3B54-Q/4/SP2

**ANON-AQTS-32CD-5 - Colden Common Parish Council/33/SP2**

ANON-AQTS-32GC-8/9/SP2

ANON-AQTS-3299-G/12/SP2

ANON-AQTS-32UE-R/3/SP2

ANON-AQTS-32UQ-4/1/SP2

ANON-AQTS-329R-9/4/SP2

ANON-AQTS-329E-V/4/SP2

ANON-AQTS-32NS-Y/7/SP2

ANON-AQTS-329U-C/3/SP2

ANON-AQTS-3B5G-A/4/SP2

ANON-AQTS-329Q-8/28/SP2

ANON-AQTS-32UU-8/5/SP2

ANON-AQTS-32S5-6/1/SP2

ANON-AQTS-32G7-V/10/SP2

ANON-AQTS-32SJ-U/9/SP2

ANON-AQTS-3BQA-Z/16/SP2

**ANON-AQTS-327U-A - Southern Water/21/SP2**

ANON-AQTS-32T7-9/9/SP2

ANON-AQTS-32TQ-3/2/SP2

ANON-AQTS-32TM-Y/2/SP2

ANON-AQTS-32TE-Q/2/SP2

ANON-AQTS-3BX4-T/9/SP2

**ANON-AQTS-32FT-R - New Alresford Town Council/6/SP2**

ANON-AQTS-3BBP-Z/7/SP2

ANON-AQTS-327B-Q/7/SP2

ANON-AQTS-32TW-9/5/SP2

ANON-AQTS-323Y-A/1/SP2

ANON-AQTS-322T-4/4/SP2

ANON-AQTS-32MY-4/5/SP2

ANON-AQTS-32ND-G/1/SP2

ANON-AQTS-32ZT-C/1/SP2

ANON-AQTS-323A-J/4/SP2

**ANON-AQTS-322X-8 - Upham Parish Council/1/SP2**

ANON-AQTS-32MQ-V/5/SP2

ANON-AQTS-32ZJ-2/2/SP2

BHLF-AQTS-32ED-7/3/SP2

BHLF-AQTS-32EJ-D/3/SP2

BHLF-AQTS-3267-B/6/SP2

BHLF-AQTS-326S-7/1/SP2

**BHLF-AQTS-3266-A - Fareham Borough Council/5/SP2**

BHLF-AQTS-32YG-X/3/SP2

**BHLF-AQTS-32YH-Y - Network Rail/3/SP2**

BHLF-AQTS-328Y-F/8/SP2

BHLF-AQTS-3289-F/4/SP2

BHLF-AQTS-3288-E/4/SP2

BHLF-AQTS-328D-T/2/SP2

BHLF-AQTS-328Q-7/11/SP2

BHLF-AQTS-328A-Q/4/SP2

BHLF-AQTS-328P-6/3/SP2

BHLF-AQTS-328V-C/4/SP2

BHLF-AQTS-328X-E/13/SP2

BHLF-AQTS-3286-C/14/SP2

BHLF-AQTS-328G-W/13/SP2

BHLF-AQTS-328N-4/1/SP2

BHLF-AQTS-32QE-M/4/SP2

BHLF-AQTS-32QY-8/7/SP2

BHLF-AQTS-32Q9-8/1/SP2

BHLF-AQTS-32QQ-Z/8/SP2

BHLF-AQTS-32QZ-9/4/SP2

BHLF-AQTS-32QC-J/3/SP2

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

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
<b>Personal reference number</b>	ANON-AQTS-3BQA-Z
<b>Full reference number</b>	ANON-AQTS-3BQA-Z/16/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b> PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor supports the overall vision set out at page 19 of the R19 LP, however, expresses concerns as to how the vision can be achieved through the current proposed spatial distribution strategy. Bloor considers that the overall housing requirement should be increased in order for the plan to be deemed sound and that the distribution of this housing requirement should be revised to ensure consistency with the evidence base. Justification for the later part of this statement is provided throughout this section. The R19 LP’s spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan's soundness. This is explained below. The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, “based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality”.</p> <p>This statistic mirrors those presented within Calibro’s Transport Feasibility report (appendix 4) which identified that the equivalent Winchester Town Area comprises of more than 40% of the available jobs in the District – 11 times greater than the next largest area of employment. This is four times the size of the next largest cluster of job opportunities. In this sense, Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary provided on</p>



numbered page 37 of the Transport Assessment (August 2024) report, which states that “travel demand in highway peaks is primarily caused by the significant in and out-commuting patterns to/from the centre of Winchester and reflects the City’s role as a regional employment centre”. Consequently, delivering significant growth in other areas will inevitably result in the need to commute to the city over longer distance to access those opportunities. However, on the Council’s own evidence, such locations are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car – compounding existing congestion, delay, air quality and variance in public transport journey times within WTA. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District’s jobs within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions. In addition to the above, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision. Indeed, the proposed allocations outside of the WTA are on low frequency bus routes with significant journey times into the WTA, where over half of all journeys would to travel to access employment. This creates the conditions for car dominance that would result in more trips on the local and strategic road networks, compounding congestion and air quality issues. Further information on this point can be found a Appendix 3. Despite the fact that such explicit recognition that WTA is the most sustainable location for growth, has been provide throughout the various iterations of the evidence base, the R19 LP at Strategic

The spatial strategy therefore proposes deliver some 63.7% of growth outside of the Winchester Town Area and therefore, as recognised in the Council’s own evidence, in the least sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This political interference has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA. The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP’s stated objectives but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy. Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.

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

**This comment has been summarised – see supporting information for full response**  
PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.

Bloor supports the overall vision set out at page 19 of the R19 LP, however, expresses concerns as to how the vision can be achieved through the current proposed spatial distribution strategy. The Local Plan's development strategy identifies three 'spatial areas' within Winchester District (Strategic Policy SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%). As per Section 3, Bloor considers that the overall housing requirement should be increased in order for the plan to be deemed sound and that the distribution of this housing requirement should be revised to ensure consistency with the evidence base. Justification for the later part of this statement is provided throughout this section. The R19 LP's spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan's soundness. This is explained below. The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, "based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality".

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	<p>times within WTA. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions. In addition to the above, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision. Indeed, the proposed allocations outside of the WTA are on low frequency bus routes with significant journey times into the WTA, where over half of all journeys would to travel to access employment. This creates the conditions for car dominance that would result in more trips on the local and strategic road networks, compounding congestion and air quality issues. Further information on this point can be found a Appendix 3.</p> <p>The spatial strategy therefore proposes deliver some 63.7% of growth outside of the Winchester Town Area and therefore, as recognised in the Council's own evidence, in the least sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This political interference has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA. The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP's stated objectives but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.</p> <p>Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p><b>This comment has been summarised – see supporting information for full response</b> PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor supports the overall vision set out at page 19 of the R19 LP, however, expresses concerns as to how the vision can be achieved through the current proposed spatial distribution strategy. The Local Plan's development strategy identifies three 'spatial areas' within Winchester District (Strategic Policy SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%). As per Section 3, Bloor considers that the overall housing requirement should be</p>

increased in order for the plan to be deemed sound and that the distribution of this housing requirement should be revised to ensure consistency with the evidence base. Justification for the later part of this statement is provided throughout this section. The R19 LP's spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan's soundness. This is explained below. The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, "based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality". This statistic mirrors those presented within Calibro's Transport Feasibility report (appendix 4) which identified that the equivalent Winchester Town Area comprises of more than 40% of the available jobs in the District – 11 times greater than the next largest area of employment. This is four times the size of the next largest cluster of job opportunities. In this sense, Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary provided on numbered page 37 of the Transport Assessment (August 2024) report, which states that "travel demand in highway peaks is primarily caused by the significant in and out-commuting patterns to/from the centre of Winchester and reflects the City's role as a regional employment centre". Consequently, delivering significant growth in other areas will inevitably result in the need to commute to the city over longer distance to access those opportunities. However, on the Council's own evidence, such locations are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car – compounding existing congestion, delay, air quality and variance in public transport journey times within WTA. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions.

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	<p>This creates the conditions for car dominance that would result in more trips on the local and strategic road networks, compounding congestion and air quality issues. Further information on this point can be found a Appendix 3. Despite the fact that such explicit recognition that WTA is the most sustainable location for growth, has been provide throughout the various iterations of the evidence base, the R19 LP at Strategic Policy SP2, as above sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).</p> <p>The spatial strategy therefore proposes deliver some 63.7% of growth outside of the Winchester Town Area and therefore, as recognised in the Council’s own evidence, in the least sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This political interference has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA. The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP’s stated objectives but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.</p> <p>Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town. Without this amend, it is not considered that the Local Plan can be deemed sound.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Letter (commenting on Policies &amp; Evidence Base)</a>  <a href="#">Supporting document 1 (South Winchester Vision Document)</a>  <a href="#">Supporting document 2 (Response to the delivery of housing)</a>  <a href="#">Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</a>  <a href="#">Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</a>  <a href="#">Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</a></p>

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Alice Lack
<b>Personal reference number</b>	ANON-AQTS-327B-Q
<b>Full reference number</b>	ANON-AQTS-327B-Q/7/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Welbeck raises no objection to a spatial strategy that delivers a balanced approach to housing that meets the needs of the Authority as a whole.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on Policies)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Andrew Uwins
<b>Personal reference number</b>	ANON-AQTS-3BBP-Z
<b>Full reference number</b>	ANON-AQTS-3BBP-Z/7/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Hazeley consider that the focus and distribution of development should be greater in and around Winchester Town.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies - includes pictures)</a>



<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/10/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Bargate Homes agree with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester City, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering on the district's growth requirements.</p> <p>In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be considered as a maximum, but a minimum. Whilst it is noted that the policy wording as currently drafted states 'for about' to suggest these are not fixed targets, it is considered that the policy wording should be clearer, i.e., that these are minimum targets.</p> <p>Part i) specifies provision for 5,640 new homes in Winchester City, however this principally comprises existing allocations and commitments, and a disproportionate reliance on a select few large allocations and windfall sites. Only 1,410 homes are to be provided through new allocations, representing just 25% of the proposed spatial allocation for Winchester City. An over-reliance on sites already contained within the old adopted plan does not represent an ambitious or positive approach for Winchester City and its role in providing for current and future development needs. It also leads to the unjustified approach of seeking to manipulate delivery such that the trajectory can be balanced out (see Housing Topic Paper re phasing). The reality is that these previously planned developments were needed and should have been completed years ago, but they continue to deliver now due to the delays incurred. This approach is wholly inadequate in the face of the current unmet need pressure from the PfSH area and affordability challenge. With respect to affordability, there is a chronic issue within the district, set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient, and will further compound the district's affordability pressures. Winchester City is by far the highest rated settlement in the district, based on the Settlement Hierarchy Review (August 2024), with an overall score of 35. Equally, according to the 2023 SHELAA, a total capacity of 5,589 homes within or adjacent to the settlement boundary has been identified. It is clear that the proposed wording of SP2 as currently drafted does not go far enough.</p>

	<p>NPPF paragraph 82d) states that ‘planning policies should (be)...flexible enough to accommodate the needs not anticipated in the plan.’ This is considered particularly relevant to the growth requirements and potential of Winchester City. The development strategy for the City needs to meet the needs of the whole community and equally ensure that the ‘local economy builds on its existing and growing strengths in higher education, creative and media industries, and other knowledge-based activities.’ Ensuring that there is sufficient housing supply to support Winchester City’s economic potential is therefore essential, and needs to be reflected in the draft local plan’s spatial strategy.</p> <p>NPPF paragraph 11 states that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.’ This particularly applies to the proximity of Winchester City to the South Hampshire Urban Areas and the need to fulfil the PfSH strategy. Consequently, the plan should maximise opportunities to deliver housing across the district, especially around Winchester City which represents the district’s most sustainable settlement.</p> <p>In short, the plan should set a much higher housing requirement, which reflects positive opportunities and available capacity. We do not consider the plan as currently drafted is based on sufficient evidence in relation housing supply and delivery assumptions. Accordingly, it should allocate all deliverable sites in sustainable locations, in accordance with the settlement hierarchy and opportunities to access services, facilities and sustainable travel options. To ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording and via additional strategic allocations.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Reflecting Winchester City’s position within the settlement hierarchy, and the over-reliance of the spatial strategy on existing allocations that were planned many years ago and have been slow to deliver, the policy wording should be amended to make clear that reference to 5,640 homes is a minimum.</p> <p>Further, and in any event, the housing target should also be increased significantly, in response to the additional site allocations available and necessary to comply with NPPF 11 b) and the DtC (including NPPF paragraphs 27 &amp; 61).</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Under Part i), the following text amendments should be made:  ‘Winchester City will make provision for a minimum of 5,640 new homes through a range of accommodation, including supporting further opportunities for sustainable sites in and around Winchester City, as well as the completion...’</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Bargate Homes   Jonathan Quarrell
<b>Personal reference number</b>	BHLF-AQTS-3288-E
<b>Full reference number</b>	BHLF-AQTS-3288-E/4/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>We broadly support this approach; but we do consider that there is a greater opportunity to allow all three areas to play a greater part in driving much needed growth in the PfSH area. As cited above, paragraph 3.1 confirms that the Local Plan approach to identify three broad geographical areas is the “same way” as before, and in our opinion, particularly with paragraph 1.2 confirming that the area “has an above average carbon footprint” this demonstrates that simply repeating the approach is perpetuating problems of poorer sustainability and poorer affordability as compared to other LPAs in the PfSH area.</p> <p>Furthermore, we note a constant tension between what ‘Winchester’s City Centre’ actually is, versus what the Council appear to want it to be. For example, the Local Plan is rightly proud of Winchester’s status as a Cathedral City, and it also rightly proud of its heritage and historic environment stemming from its former role as the Capital of England, and yet, the strategy that underpins the District’s Settlement Hierarchy refers to “Winchester Town”. This tension is also expressed at paragraph 12.1 which states “The area referred to by the city council as Winchester Town consists of the Winchester Wards plus the adjoining built up areas of Badger Farm, Oliver’s Battery and Harestock, as defined on the Policies Map” (underlining is our emphasis).</p> <p>The “Local Plan Vision” set out on page 19 states, for example, “The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character” (underlining is our emphasis). In our opinion, this demonstrates a policy position of preservation and not growth.</p> <p>We consider that the City of Winchester and its surrounding settlements have a much greater role to play in the region than the Local Plan suggests, and we explore this topic further later in these Representations. See additional PDF.</p>
<b>What modification(s) are necessary to make the</b>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Bargate Homes Limited
<b>Personal reference number</b>	BHLF-AQTS-328D-T
<b>Full reference number</b>	BHLF-AQTS-328D-T/2/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Strategic Policy SP2: Spatial Strategy and Development Principles sets out the development strategy for the District. Bargate continue to support the Spatial Strategy which will be delivered by directing growth to Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Areas. The Spatial Strategy seeks to deliver the Council's current housing requirement in full, as well as some of the unmet need from other PFSH authorities.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The consultation on the Regulation 19 commenced whilst the government were consulting on the revised NPPF. Whilst the outcome of the NPPF consultation is not fully known, the changes proposed align closely with the Government's objectives as set out in the Written Ministerial Statement entitled "Building the homes we need". The revised NPPF will become the policy mechanism to fulfil the objectives of improving affordability, promoting growth and building 1.5 million homes over the next five years. It is reasonable to assume that the core changes that go to the heart of these objectives will be adopted as drafted or in wording very close to the existing drafting, when the revised NPPF is published later this year.</p> <p>It is noted that the Council has bought forward its local plan timetable to seek to benefit from the proposed transitional arrangements set out at paragraph 226(c) the NPPF consultation document (2024).</p> <p>While proposed transitional arrangements contained within the revised NPPF will enable Council's who have a plan at Regulation 22 stage to progress within an examination on the basis of existing housing need, it is expected that where a plan is found sound at examination, a review of that plan will be required straight away if its annual housing requirement is more than 200 dwellings lower than the relevant published Local Housing Need figure. This reflects correspondence from the Ministry of Housing, Communities and Local Government entitled "Playing your part in building the homes we need" dated 30th July 2024<sup>1</sup> where it states: For plans at examination this means allowing them to continue, although where there is a significant gap between the plan and the new local housing need figure, we will expect authorities to begin a plan immediately in the new system. (Nova underline for emphasis). So while meeting the current requirement in full, the plan will not meet the housing needs of the District upon adoption of the NPPF changes, as drafted. The changes to the Standard Method will see the housing requirement for WCC increase significantly from 676 pa to 1099 pa (a 62% increase), triggering the need for an immediate review of the Local Plan should it</p>

	<p>be found sound at examination. It is therefore important that the plan provides an appropriate strategy and timetable to enable a timely review of the plan and meet this increased need; the requirements for which are set out in paragraph 33 of the NPPF (2023) and aside from the paragraph number, do not change under the 2024 proposals.</p> <p>Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. (Nova underline for emphasis). Accordingly, Bargate Homes consider that the plan should therefore be updated to include a positive commitment to commence a review of the Local Plan within 1 year of its adoption. This commitment is essential for a number of reasons, in particular regarding the interaction between local and neighbourhood plans and the setting of housing requirements and phasing, which is considered further below. See submission for full details</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The consultation on the Regulation 19 commenced whilst the government were consulting on the revised NPPF. Whilst the outcome of the NPPF consultation is not fully known, the changes proposed align closely with the Government’s objectives as set out in the Written Ministerial Statement entitled “Building the homes we need”. The revised NPPF will become the policy mechanism to fulfil the objectives of improving affordability, promoting growth and building 1.5 million homes over the next five years. It is reasonable to assume that the core changes that go to the heart of these objectives will be adopted as drafted or in wording very close to the existing drafting, when the revised NPPF is published later this year. It is noted that the Council has bought forward its local plan timetable to seek to benefit from the proposed transitional arrangements set out at paragraph 226(c) the NPPF consultation document (2024).</p> <p>While proposed transitional arrangements contained within the revised NPPF will enable Council’s who have a plan at Regulation 22 stage to progress within an examination on the basis of existing housing need, it is expected that where a plan is found sound at examination, a review of that plan will be required straight away if its annual housing requirement is more than 200 dwellings lower than the relevant published Local Housing Need figure. This reflects correspondence from the Ministry of Housing, Communities and Local Government entitled “Playing your part in building the homes we need” dated 30th July 2024<sup>1</sup> where it states: For plans at examination this means allowing them to continue, although where there is a significant gap between the plan and the new local housing need figure, we will expect authorities to begin a plan immediately in the new system. (Nova underline for emphasis). So while meeting the current requirement in full, the plan will not meet the housing needs of the District upon adoption of the NPPF changes, as drafted. The changes to the Standard Method will see the housing requirement for WCC increase significantly from</p>

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



<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Barwood Land
<b>Personal reference number</b>	ANON-AQTS-329R-9
<b>Full reference number</b>	ANON-AQTS-329R-9/4/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Barwood Land objects to Policy SP2 as it is considered unsound. Please refer to representations submitted by Grass Roots Planning on behalf of Barwood Land (e-mailed 11/10/24) for a full response and justification behind this objection. Barwood Land object to policy H3 and SP2 which both refer to the spatial strategy and distribution of housing. The Policies are not considered to be positively prepared, as they do not represent the most appropriate strategy to meet the area’s objectively assessed needs. In summary the approach continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. This approach relies too heavily on Winchester itself, and it is felt that housing should be distributed more evenly across the district, to support the facilities in smaller towns and villages and deliver affordable housing across the district. There are no doubt various locations in Market Towns and Rural Areas which are suitable to deliver enhanced levels of growth. This is particularly apparent when considering sustainable locations such as Otterbourne, which could deliver significantly more dwellings than are currently allocated to the settlement. The Local Plan is misguided as the chosen growth strategy should be focused on the sustainability and suitability of a place rather than previous commitments - following past trends is not a rational way to plan and is as unsound as it is unjustified.</p> <p>Page 18 of the Council’s latest AMR 2022/23 includes a chart showing net dwelling completions across the district, and indicates the important contribution made by Market Towns and Rural Areas. The Core Strategy was informed by a “settlement hierarchy” approach which ranked settlements, according to the availability and accessibility of a broad range of facilities, the settlement’s economic role and the environmental constraints to development. This resulted in the classifications of Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Areas, which were progressed forward as part of the emerging Local Plan. The Council’s Settlement Hierarchy 2022 notes that Otterbourne functions as one of several villages with a high degree of accessibility. As set out in paragraph 2.2 of the Settlement Hierarchy document “Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may</p>

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Sustainability can be promoted amongst smaller settlements by treating these as parts of a 'polycentric' settlement which takes into account the propensity for people to travel to their nearest facility, even if that lies beyond their defined village. It is our view that the sustainability of Otterbourne should be considered as part of a polycentric network of adjoining villages. Given Otterbourne is close to other settlements it is accessible to a significant number of amenities and services within walking/cycling distance, which would be commensurate to that expected of a much larger settlement. The area could therefore accommodate a greater contribution to the overall housing requirement for Winchester. Taking account of the wider accessibility of neighbouring villages, following the polycentric model, the score appointed to Otterbourne would have been significantly higher, with the ability to access a secondary school, GP surgery and railway station within cycling distance of large areas of the settlement. In reviewing the assessments and scores awarded, it is clear this consideration did not factor into the progressed hierarchy. If it had of been in respect of Daily Facilities/ Services, Otterbourne could have scored a full 20. For example, Otterbourne was awarded a 0 under pre-school/ nursery, despite there being various pre-school/ nursery opportunities in the vicinity which residents obviously utilise, including Bright Horizons and Otterbourne Day Nursery and Preschool on Otterbourne Hill. Otterbourne was also given a score of 0 for access to a train station, when Shawford train station is within a short c. 2km cycling distance; and indeed, proposals to potentially improve this link could be delivered as part of a future application.

In reviewing further, Otterbourne was provided a score of just 2 points for "Other facilities or services", which should have been higher given the availability of facilities within the surrounding villages. In terms of employment availability which also impacts the potential sustainability of a settlement, the site is surrounded by several significant employment sites within a short commuting distance including the following:

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	<p>Barwood Land object to policy H3 which is considered unsound as it does not appropriately apportion growth to the most sustainable locations or consider how smaller settlements can (through a polycentric approach) actually provide access to a far broader range of services and facilities than simply assessing the sustainability of a location in terms of the settlement boundaries. The evidence utilised to support the policy (including windfall figures for the individual smaller settlements such as Otterbourne), is not appropriately apportioned and suggests this alongside the proposed allocation will not meet the proposed need under the existing SM, let alone with a more detailed understanding of the implications of the proposed SM update. The Policy is not considered to be positively prepared (i.e. deliver an appropriate strategy to meet the area's objectively assessed needs) and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.</p>
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Assessing settlements such as Otterbourne using Parish boundaries as ‘hard lines’ is inappropriate and does not reflect the reality of how people live and interact with their environs. Instead, we believe that given the availability of services in and around Otterbourne, it should be considered as part of a ‘polycentric’ settlement and one which could and should play a more significant role in terms of meeting the future housing needs of the district. The Assessment of Windfall Trends and Potential Report (2021) which remains the latest version of the document to support the Reg 19 Local Plan states that “A potential windfall supply for the MTRA3a settlements as a whole has been calculated as 45 dwellings (3 dwellings per annum over 15 years)”. As set out in paragraph 5.25 of the Windfall Assessment report the settlements which fall within the category MTRA3(a) include: Compton Down, Hursley, Knowle, Littleton, Micheldever, Micheldever Station, Old Alresford, Otterbourne, South Wonston, Southdown, Southwick, Sparsholt and Sutton Scotney. However, in reviewing the Local Plan housing sources for Hursley (pg. 481), Otterbourne (pg. 485), South Wonston (pg. 491) and Sutton Scotney (pg. 499) this shows that these settlements have each been given a windfall allowance of 20 dwellings. This highlights the windfall allowance for these settlements does not follow the evidence set out in the Windfall Assessment. The Council looks to be placing an over reliance on the delivery of windfall development in the smaller settlements when they should be ensuring the delivery of larger allocations in these settlements to provide greater certainty that the overall housing requirement will be met, rather than the hope that the windfall trend will continue on sites that are not specifically identified now in the plan.

The response provided in relation to the calculation of the Windfall allowance, as set out in the 2024 Housing Topic Paper. It is appropriate to make an allowance for windfall at the district level, but it is not critical whether the estimates prove to be exact for each settlement”. However, we do not feel the statement is a justified response to this concern. The Local Plan has apportioned a need for the various settlements, which is evidenced as being met through allocations, windfall development and existing commitments/ completions. If the windfall allowance for an area is too high, surely to meet that need a larger allocation would be

	<p>required. Assessing Otterbourne specifically, the Council has included a windfall allowance of 20 dwellings over the plan period to 2040. However as evidenced in the Assessment of Windfall Trends and Potential Report (2021), just 5 dwellings were delivered over the 11 year period between 2012 – 2023. Also acknowledging as of 2023, there were no outstanding commitments. This again, highlights that a windfall allowance for Otterbourne of 20 dwellings is too high and will lead to under delivery. Based on the completions evidence it is considered more realistic to suggest a windfall allowance of around 9 dwellings for a settlement such as Otterbourne. The evidence base therefore suggests that the Council should look to allocate a site capable of delivering at least 64 dwellings in Otterbourne to ensure that housing need is met on suitable and sustainable sites within the village (acknowledging this is without further considerations regarding the implications of the SM update).</p> <p>Barwood Land object to policy H3 which is considered unsound as it does not appropriately apportion growth to the most sustainable locations or consider how smaller settlements can (through a polycentric approach) actually provide access to a far broader range of services and facilities than simply assessing the sustainability of a location in terms of the settlement boundaries. The evidence utilised to support the policy (including windfall figures for the individual smaller settlements such as Otterbourne), is not appropriately apportioned and suggests this alongside the proposed allocation will not meet the proposed need under the existing SM, let alone with a more detailed understanding of the implications of the proposed SM update. The Policy is not considered to be positively prepared (i.e. deliver an appropriate strategy to meet the area’s objectively assessed needs) and continues to be too focused on Winchester Town and South Hampshire Urban Areas, neglecting to fully consider the potential that smaller sustainably located towns and villages can offer. It is suggested that the policy should be modified to allow for an increased focus on those smaller settlements and lesser reliance on Winchester Town.</p>
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on policies, policies map &amp; evidence base - includes tables and pictures)</a> (pdf, 6mb) <a href="#">Supporting document 1 (Vision document - Cranbourne Drive)</a> (pdf, 9.9mb) <a href="#">Supporting document 2 (Preliminary Ecological Appraisal (PEA))</a> (pdf, 4.1mb) <a href="#">Supporting document 3 (Preliminary Flood Risk and Drainage Review)</a> (pdf, 11.6mb) <a href="#">Supporting document 4 (Heritage Appraisal)</a> (pdf, 3.5mb) <a href="#">Supporting document 5 (Map - Compliant Site Access)</a> (pdf, 456kb)

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

[Supporting document 6 \(Local Plan Site Promotion - Transport\)](#) (

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Bellway Strategic Land   Daniel Poole
<b>Personal reference number</b>	BHLF-AQTS-3289-F
<b>Full reference number</b>	BHLF-AQTS-3289-F/4/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>We broadly support this approach; but we do consider that there is a greater opportunity to allow all three areas to play a greater part in driving much needed growth in the PfSH area. As cited above, paragraph 3.1 confirms that the Local Plan approach to identify three broad geographical areas is the “same way” as before, and in our opinion, particularly with paragraph 1.2 confirming that the area “has an above average carbon footprint” this demonstrates that simply repeating the approach is perpetuating problems of poorer sustainability and poorer affordability as compared to other LPAs in the PfSH area.</p> <p>Furthermore, we note a constant tension between what ‘Winchester’s City Centre’ actually is, versus what the Council appear to want it to be. For example, the Local Plan is rightly proud of Winchester’s status as a Cathedral City, and it also rightly proud of its heritage and historic environment stemming from its former role as the Capital of England, and yet, the strategy that underpins the District’s Settlement Hierarchy refers to “Winchester Town”. This tension is also expressed at paragraph 12.1 which states “The area referred to by the city council as Winchester Town consists of the Winchester Wards plus the adjoining built up areas of Badger Farm, Oliver’s Battery and Harestock, as defined on the Policies Map” (underlining is our emphasis). The “Local Plan Vision” set out on page 19 states, for example, “The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character” (underlining is our emphasis). In our opinion, this demonstrates a policy position of preservation and not growth.</p> <p>We consider that the City of Winchester and its surrounding settlements have a much greater role to play in the region than the Local Plan suggests, and we explore this topic further later in these Representations. See additional PDF.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/6/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy SP2</p> <p>This policy is considered to be:</p> <ul style="list-style-type: none"> <li>• Not legally compliant</li> <li>• Not sound</li> <li>• Not in compliance with the duty to co-operate</li> </ul> <p>Whilst BSP generally supports the strategy for the delivery of new housing, economic growth and diversification for each of the three spatial areas, including Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Areas, concern is raised that the overall provision of new homes to each of those areas will not be sufficient to accommodate the required housing needs based on changes to national policy, as outlined in the previous Section 2 and further detailed in Section 4 in relation to Strategic Policy H3. Furthermore, the proposed housing supply will not nearly be able to accommodate the evidenced need for affordable housing, as detailed in Section 4 Policy H6. It is considered that the available and deliverable capacities within Winchester Town and South Hampshire Urban Areas have been comprehensively explored, particularly with regard to previously developed land and/or areas defined as grey belt. However, these locations would unlikely be able to meet all of the additional housing.</p> <p>We therefore strongly recommend that the significant increase in required housing needs based on the proposed standard method should be met within areas likely able to accommodate sustainable growth with a priority on growth in Market Towns and, to a limited degree and as a secondary option, within rural areas. The policy should be amended to increase the provision made in subsections i (5,640), ii (5,650) and iii (3,850) to ensure the housing needs can be adequately met with sufficient deliverable sites. see additional info PDF</p>
<b>What modification(s) are necessary to make the</b>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
<b>Personal reference number</b>	ANON-AQTS-329Q-8
<b>Full reference number</b>	ANON-AQTS-329Q-8/28/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Whilst Bloor Homes supports the amended policy in principle, it remains concerned that the approach proposed would result in a plan which is not positively prepared, is not justified and is not effective as it would not provide a strategy that provides sufficient housing to meet objectively assessed need and the identified unmet need of its neighbours and does not adequately support the sustainability of Winchester Town and the market towns and larger rural settlements, including Wickham.</p> <p>Bloor Homes agrees with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering on the district's growth requirements. It therefore welcomes the increased provision in the Market Towns and Rural Area. In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be considered as a maximum, but a minimum. Whilst it is noted that the policy wording as currently drafted states 'for about' to suggest these are not fixed targets, it is considered that the policy wording should be clearer, i.e., that these are minimum targets.</p> <p>NPPF paragraph 11 states that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.' whilst the NPPG is clear that the standard methodology set out within it provides a "minimum" figure of housing need (ID: 2a-002-20190220). It is a "starting point" (ID: 2a- 010-20201216). This particularly applies in respect of the need to contribute to addressing the (growing) unmet need within the Partnership for South Hampshire area, as part of the Duty to Cooperate.</p> <p>Consequently, to ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording. The wording of i, ii and iii amended to read 'at least XX new homes'.</p>



	<p>Winchester City Council should consider providing additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites.</p> <p>Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites across the three spatial areas, with potential to provide additional growth, for example Land at Mill Lane, Wickham, which is explained further below. The key to a successful plan is to ensure that each area achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced. There is a chronic affordability challenge within the district, as set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. There is therefore a need for additional housing to be brought forward. By way of example, Wickham is a sustainable settlement, with sustainable options for growth and is rated as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognized through the addition of the draft allocation Policy WK5, Mill Lane. The draft allocation Land at Mill Lane, Wickham is conveniently located within a 15-minute walking distance of the market square which features essential amenities such as retail facilities, and there is a local primary school, a health centre, a community centre and playing fields. This accessibility aligns with and even exceeds the ambition for 20-minute neighbourhoods, under Strategic Policy T1. Additionally, the market square provides regular bus services to Winchester and Fareham, enhancing connectivity. It is a sustainable location for new homes that benefits from many locational advantages and should be expanded to incorporate Land at the junction of Mill Lane, Wickham (WI06), increasing the total number of units on the site from 40 to 100. The provision of additional housing at this location will ensure that the plan is positively prepared and remains effective over its period. The number of homes to be provided within Market Towns and Rural Area set out at criteria iii should therefore be increased to reflect the sustainable opportunity at Mill Lane.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Whilst Bloor Homes supports the amended policy in principle, it remains concerned that the approach proposed would result in a plan which is not positively prepared, is not justified and is not effective as it would not provide a strategy that provides sufficient housing to meet objectively assessed need and the identified unmet need of its neighbours and does not adequately support the sustainability of Winchester Town and the market towns and larger rural settlements, including Wickham.</p> <p>Bloor Homes agrees with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering on the district's growth requirements. It therefore welcomes the increased provision in the Market Towns and Rural Area.</p>

In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be considered as a maximum, but a minimum. Whilst it is noted that the policy wording as currently drafted states 'for about' to suggest these are not fixed targets, it is considered that the policy wording should be clearer, i.e., that these are minimum targets. NPPF paragraph 11 states that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.' whilst the NPPG is clear that the standard methodology set out within it provides a "minimum" figure of housing need (ID: 2a-002-20190220). It is a "starting point" (ID: 2a- 010-20201216). This particularly applies in respect of the need to contribute to addressing the (growing) unmet need within the Partnership for South Hampshire area, as part of the Duty to Cooperate. Consequently, to ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording. The wording of i, ii and iii amended to read 'at least XX new homes'.

Winchester City Council should consider providing additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites. Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites across the three spatial areas, with potential to provide additional growth, for example Land at Mill Lane, Wickham, which is explained further below. The key to a successful plan is to ensure that each area achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced. There is a chronic affordability challenge within the district, as set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. There is therefore a need for additional housing to be brought forward. By way of example, Wickham is a sustainable settlement, with sustainable options for growth and is rated as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognized through the addition of the draft allocation Policy WK5, Mill Lane.

The draft allocation Land at Mill Lane, Wickham is conveniently located within a 15- minute walking distance of the market square which features essential amenities such as retail facilities, and there is a local primary school, a health centre, a community centre and playing fields. This accessibility aligns with and even exceeds the ambition for 20-minute neighbourhoods, under Strategic Policy T1. Additionally, the market square provides regular bus services to Winchester and Fareham, enhancing connectivity. It is a sustainable location for new homes that benefits from many locational advantages and should be expanded to incorporate Land at the junction of Mill Lane, Wickham (WI06), increasing the total number of units on the site from 40 to 100. The provision of additional housing at this location will ensure that the plan is

	<p>positively prepared and remains effective over its period. The number of homes to be provided within Market Towns and Rural Area set out at criteria iii should therefore be increased to reflect the sustainable opportunity at Mill Lane.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Whilst Bloor Homes supports the amended policy in principle, it remains concerned that the approach proposed would result in a plan which is not positively prepared, is not justified and is not effective as it would not provide a strategy that provides sufficient housing to meet objectively assessed need and the identified unmet need of its neighbours and does not adequately support the sustainability of Winchester Town and the market towns and larger rural settlements, including Wickham. Bloor Homes agrees with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering on the district's growth requirements. It therefore welcomes the increased provision in the Market Towns and Rural Area. In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be considered as a maximum, but a minimum. Whilst it is noted that the policy wording as currently drafted states 'for about' to suggest these are not fixed targets, it is considered that the policy wording should be clearer, i.e., that these are minimum targets.</p> <p>NPPF paragraph 11 states that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.' whilst the NPPG is clear that the standard methodology set out within it provides a "minimum" figure of housing need (ID: 2a-002-20190220). It is a "starting point" (ID: 2a- 010-20201216). This particularly applies in respect of the need to contribute to addressing the (growing) unmet need within the Partnership for South Hampshire area, as part of the Duty to Cooperate. Consequently, to ensure that the draft plan is flexible and positively prepared to cover the whole of the plan period, the realistic need for homes above these targets should be acknowledged within the policy wording. The wording of i, ii and iii amended to read 'at least XX new homes'. Winchester City Council should consider providing additional development, beyond that set out in the emerging plan, during the plan period to meet the unmet needs of neighbouring authorities and any non-delivery on allocated sites. Having established that there is a need to increase the current housing provision, there is a range of large and smaller sites across the three spatial areas, with potential to provide additional growth, for example Land at Mill Lane, Wickham, which is explained further below.</p> <p>The key to a successful plan is to ensure that each area achieves a level of growth that enables their economies to grow and not stagnate, ensures that services and facilities can continue to be provided so that the sustainability credentials of both higher and lower tier settlements can be maintained and enhanced. There is a chronic affordability challenge within the district, as set out in the SHMA (July 2024). Relying on existing allocations will not be sufficient and will further compound the district's affordability pressures. There is therefore a need for additional housing to be brought forward.</p>

	<p>By way of example, Wickham is a sustainable settlement, with sustainable options for growth and is rated as a larger settlement in the 2024 Settlement Hierarchy, with a reasonable level of services and facilities. There are sustainable options for growth at Wickham which would support and maintain existing services and facilities within the town. This has been recognized through the addition of the draft allocation Policy WK5, Mill Lane.</p> <p>The draft allocation Land at Mill Lane, Wickham is conveniently located within a 15- minute walking distance of the market square which features essential amenities such as retail facilities, and there is a local primary school, a health centre, a community centre and playing fields. This accessibility aligns with and even exceeds the ambition for 20-minute neighbourhoods, under Strategic Policy T1. Additionally, the market square provides regular bus services to Winchester and Fareham, enhancing connectivity. It is a sustainable location for new homes that benefits from many locational advantages and should be expanded to incorporate Land at the junction of Mill Lane, Wickham (WI06), increasing the total number of units on the site from 40 to 100. The provision of additional housing at this location will ensure that the plan is positively prepared and remains effective over its period. The number of homes to be provided within Market Towns and Rural Area set out at criteria iii should therefore be increased to reflect the sustainable opportunity at Mill Lane.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies, policies map and evidence base)</a>  <a href="#">Vision document (Land At Mill Lane, Wickham)</a></p>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/4/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy sets out the spatial strategy to be used in the Local Plan to distribute development across the plan area. The approach set out in this policy is supported, and the distribution of development according to the three sub- areas seems sensible and is supported. It would be helpful, however, if the policy could also set out the total number of new homes that is aimed to be delivered over the plan period. Including this figure would enable users of the Local Plan to see how the spatial strategy will contribute to delivering the homes that are needed in Winchester district.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	It would be helpful, however, if the policy could also set out the total number of new homes that is aimed to be delivered over the plan period. Including this figure would enable users of the Local Plan to see how the spatial strategy will contribute to delivering the homes that are needed in Winchester district.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Catesby Estates
<b>Personal reference number</b>	ANON-AQTS-32NS-Y
<b>Full reference number</b>	ANON-AQTS-32NS-Y/7/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The draft Local Plan (at Policy SP2) sets out the proposed spatial strategy, comprising 5,640 homes to be allocated to Winchester Town, 5,650 to South Hampshire Urban Areas and 3,850 to Market Towns and Rural Area. Catesby does not support the strategy presented in Draft Policy SP2. Firstly, as detailed in our representations on Policy H1, the sources of housing supply currently identified in the Plan will not meet the identified housing requirement. Moreover, whilst the Council has accelerated the commencement of the Regulation 19 consultation, in the hope of having the Plan examined under the current December 2023 NPPF and the current Standard Method, it is ultimately unlikely to escape the necessity of having to allocate many new sites for residential development, in addition to those currently proposed for such. This is, of course, in addition to addressing unmet needs arising in partner Local Authorities, where the Standard Method is also expected to rise. Therefore, whether through changes made before the Plan's submission, Main Modifications arising from the Examination or via an immediate review (if the Plan is found to be sound), the Council is going to have to plan proactively to deliver a far higher level of housing than is presently envisaged. That then calls into question the soundness of the spatial strategy and development principles presented in Policy SP2. This is to say that even if the Plan is capable of adoption in 2025, as the Council hopes, its spatial approach risks becoming redundant almost before the ink is dry.</p> <p>The Council will then have to allocate new strategic allocations/strategic growth areas to meet the dramatically higher housing targets that arise from the Government's proposals. These new strategic sites will invariably take a long-time to come forward. They must then be balanced through the allocation of an extensive suite of small/medium-sized sites, which can be brought forward more easily as self-contained developments, thereby offering a consistent supply throughout the Plan period. Achieving a balanced supply is also essential when it is remembered that the current Development Plan has not been effective at consistently sustaining a housing land supply throughout the Plan-period. This is partly because the preponderance towards strategic allocations resulted in delayed delivery compared to anticipated trajectories. The challenges for delivering large-scale allocations are well-documented, with infrastructure requirements, the need for strategic masterplanning and multiple landownerships/land interests acting together (often in combination) to impede timely implementation. LPP1 required 12,500 dwellings over the Plan's 20-year</p>

	<p>period (or 625 dpa). Over the first 9 years of the Plan 4,640 dwellings were completed (1,000 dwellings short of the annualised requirement of 5,625 homes for this period). It is also notable that the LPP1 trajectory expected 6,548 dwellings to be completed for this 9-year period (2011/12 to 2019/20) but actual completions fell nearly 2,000 short (i.e., 1,908 dwellings below what the Plan had expected).</p> <p>In view of the above, the Local Plan should be modified (at this stage) to include new small and medium-sized sites throughout the settlement hierarchy. This requires additional allocations within the 'Market Towns and Rural Area' category. This is essential to start future-proofing the Plan in anticipation of the fundamental change in the level of housing that will need to be provided should the Government's consultation proposals be implemented (as seems highly plausible, given manifesto commitments and the strength of the parliamentary majority).</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The emerging Local Plan should be modified to make additional allocations throughout the settlement hierarchy to help future-proof it in anticipation of a far higher assessment of housing need arising through the proposed revised Standard Method. These additional sites should be varied in scale to ensure a diversity of supply. This is essential to mitigate the delivery risks associated with strategic scale sites.</p> <p>As detailed in our representations on policies H1 and H3, many sites are available for development around Wickham (as identified in the SHELLA, 2024), recognised as a sustainable 'Larger Rural Settlement' in the proposed settlement hierarchy. Of the promoted sites, Land South of Titchfield Lane (site ref WI19) has long been identified as a strong candidate for allocation at this settlement, with the Parish Council regarding it as the 'runner up' site during the preparation of Local Plan Part 2 (LPP2). Overall, the Plan's spatial strategy and distributional principles should be modified by allocating additional sites, notably Land South of Titchfield Lane at Wickham.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Policy SP2 cannot be rendered sound through simple modifications to its wording. The policy must be revisited more generally, as described above.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i></p>	<p>Yes  <a href="#">Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)</a>  <a href="#">Supporting document 2 (Vision Framework)</a>  <a href="#">Supporting document 3 (Concept Plan)</a>  <a href="#">Supporting document 4 (Integrated Impact Assessment comments)</a></p>



*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>	SP2
<b>Name of respondent (or client)</b>	Clayfield Developments Limited
<b>Personal reference number</b>	BHLF-AQTS-326S-7
<b>Full reference number</b>	BHLF-AQTS-326S-7/1/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>In determining an allocation of about 3,850 new homes for Market Town and Rural Areas the policy is predicated on 'Windfall Development' providing approximately 2,875 new homes to 2040. This provision is based on analysis of historical provision as set out within the published Windfall Assessment Report (February 2021).</p> <p>The Windfall Assessment Report assesses that a potential windfall allowance of 32 dwellings per annum for a 15 year period (within the report 2023/24 to2037/38). It further states that "In order to provide an estimate at the individual settlement level, this total has split into general estimates for each of the 8 MTRA2 Settlements, taking account of previous windfall development and the likely capacity for ongoing windfall, as follows (although individual settlement estimates should be treated with caution): Waltham Chase - 50 (3 per annum)." However, that average net development of windfall sites within Waltham Chase over the seven year period from 2012/13 to 2018/19 has been 2.85 per annum. This figure itself is misleading, as there were no windfall developments in 5 of the 7 years and the demolition and redevelopment of a single dwelling in 2017-19 provided 11 of the total 20 net completions. While the median net completions is 2.85, both the median and mode are 0. It is therefore reasonable to conclude that the allowance of 50 windfall net completions over the plan period within the settlement of Waltham Chase is unrealistic and is unlikely to be achieved, thereby Policy SP2 is unsound. Policy SP2 can be made sound through the allocation of addition residential development within or adjoining the Waltham Chase settlement. see additional info PDF</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	

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

<b>Policy/Evidence base document</b>	SP2
<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/3/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Full response on website. Network Rail consider this Policy to be sound and are supportive of the promotion of sustainable transport as a development principle. As recognised in part x of the Policy it is essential to ensure that any identified infrastructure needs are provided in a timely manner to support growth and where possible these should be fully funded by the developer or a third party that is generating the pressures on infrastructure.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	SP2
<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-8/5/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>[Please see formatted submission sent by email] - tracked changes cannot be shown in Citizenspace or in this Excel spreadsheet)</p> <p>Paragraph 20 of the Framework requires strategic policies to establish the overall strategy for the provision of housing, infrastructure and community facilities alongside the conservation of the built and natural environment. In this respect, Crest Nicholson notes there is a proven record of strategic allocations, particularly the MDA, in the district successfully delivering infrastructure, affordable housing and comprehensive development over a sustained period and therefore supports the approach set out in the Spatial Strategy and Development Principles under Strategic Policy SP2, which establishes the principle of focusing development at large scale strategic MDAs. Crest Nicholson believes that this is the most sustainable and appropriate response to addressing the climate emergency declared by the Council and represents a long-term policy response to planning for strategic growth.</p> <p>The Plan's strategy of focusing future growth in the most sustainable locations aligns with paragraph 109 of the Framework. Crest Nicholson's commitment to sustainable construction is detailed within our representations to Policy CN3. However, irrespective of this, Crest Nicholson considers that the most effective means of responding positively to the climate emergency and pursuing a policy that contributes effectively to reducing carbon emissions is to ensure that new development is allocated in locations where there is the greatest potential to encourage sustainable lifestyles and reduce travel demand, which is a key contributor to greenhouse gas emissions and climate change. The North Whiteley MDA is an established sustainable location for growth with a wide range of services and facilities (including schools, convenience stores and playing fields) within walking distance of the dwellings that are being delivered in this location. Accordingly, Crest Nicholson supports the proposed focusing of additional growth at the North Whiteley MDA under Strategic Policy SP2 as a valuable contributor towards addressing the Council's declared climate emergency.</p>
<b>What modification(s) are necessary to make the</b>	No changes.

<b>policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	No changes.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting document 2 (Policy SP2 comments)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Croudace Homes
<b>Personal reference number</b>	BHLF-AQTS-328A-Q
<b>Full reference number</b>	BHLF-AQTS-328A-Q/4/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Full response on website</p> <p>Strategic Policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification. The strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester Town and the South Hampshire Urban Areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, Market Towns and Rural Area, is identified to make provision for 3,850 new homes.</p> <p>The site falls within the Market Towns and Rural Area. Whilst we are supportive that this area will make provision for some housing, as this spatial area covers a large physical area of the district, we believe that the Council should be more ambitious in its housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PfSH) area.</p> <p>We support the development strategy for Market Towns and the Rural Area which sets out that development will be provided in the most accessible and sustainable locations, to support the vitality and viability of communities. However, it is considered that the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities. Therefore, whilst the allocation of the westernmost section of the land at Southwick Road is supported, it is considered that Wickham is a sustainable settlement which is geographically well located in the PfSH area to accommodate unmet need arising from neighbouring authorities and which is capable of accommodating further development over the plan period. In the light of this we would encourage the Council to make provision for further homes in the Market Towns and the Rural Area by considering allocating further land at Southwick Road to provide a comprehensive development which would further promote the vitality and viability of Wickham, and maintain its rural character and individual settlement identity through a comprehensive landscaping scheme as required by Policy SP2.</p> <p>Overall, we support the Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the market towns and rural areas of the district to meet local needs whilst</p>



	ensuring that proposals do not conflict with the policies which aim to respect the environment. However, we encourage the Council to review the housing provision for this area and increase it to ensure it is in accordance with the Government's ambitious housing targets over the next five years and beyond. Section 3 of these representations further explores the housing provision for the district over the plan period.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Croudace Homes (Alison Walker)
<b>Personal reference number</b>	BHLF-AQTS-32QZ-9
<b>Full reference number</b>	BHLF-AQTS-32QZ-9/4/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>This Policy is referenced elsewhere in the plan as the “sustainable development strategy” (paragraphs 9.26 and 14.4). It is unusual not to see sustainable development as a foundation or “at the heart” to decision making (Paragraph 10 of the NPPF), as set out in Section 2 of the NPPF. The first and only mention of sustainable development in Policy is in Strategic Policy D5 - Masterplans. In fact, Sustainable Development is only written 13 times in 578 pages. It is not a term that is referenced in the Vision or Objectives of the Plan. This policy is titled, “Spatial Strategy and Development Principles” and sets the broad principles for development in this district. Sustainable development is not explicitly written in the supporting policy text or within the policy itself. It begs the question whether the Council hold delivering Sustainable Development at the core of the plan. It is recommended that the Council amends the policy wording to explicitly state that the Council is committed to delivering sustainable development. Croudace supports the principles set out in SP2 however it does not agree that the Council has planned for sufficient housing for its own needs and those of adjoining councils with unmet need. Not does it provide sufficient housing for the growing housing need nor does it provide a sufficient number of homes to deliver the requirement of affordable housing which currently is published to stand at 1,579 households. The policy does not have Sustainable Development at its core and requires revision.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (commenting on policies and evidence base)</a> <a href="#">Supporting document 1 (Vision Document)</a> <a href="#">Supporting document 2 (Map - Land east of Highbridge Road, Colden Common)</a> <a href="#">Supporting document 3 (Indicative layout)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/33/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>SP2 - Colden Common has been determined as a larger rural settlement and therefore as one of the most sustainable and accessible areas for development in this emerging Local Plan. This has been determined by the scoring contained in the settlement hierarchy. The Parish Council considers the hierarchy to be a blunt instrument which does not allow any consideration of the nuances when assessing sustainable locations. We are described as a larger population area but with a poor level of service provision on the Local Plan vision on 95. For example, Colden Common has a surgery which has very limited appointments and is a satellite from Twyford, the majority of appointments are held in Twyford. Public Transport services are extremely limited and infrequent, and the hierarchy does not account for this. A daily service is currently available but does not serve the community in terms of frequency and destination. It currently is impossible to get to Eastleigh before 9am. The inadequate service to Eastleigh (61 bus service) is recommended to be scrapped completely which will result in no bus service to Eastleigh for those working or attending Eastleigh College, Barton Peveril Sixth Form College or accessing shops and other services. This service also support those needing to access medical services in Twyford, employment and education in Winchester and a direct link to Royal Hampshire County Hospital.</p> <p>The village has one very small shop which serves the entire village, which furthermore impacts the requirement for improved bus services to support development for basics such as food shopping. The village is sandwiched between two very busy B roads the B3354 and the B3335. Neither road has a cycle route into Winchester or Eastleigh. Therefore, the reliance on car travel has not been addressed. We fully support the principle of policy NE6 but feel that allocation of houses in Colden Common does not reflect this policy. Colden Common is suffering from surface water and sewage flooding, both of which are impacting homes and roads in Brambridge. Surface water flooding frequently cuts off the village from accessing Eastleigh via Highbridge Road and impacts the current limited bus services we have to Eastleigh, access to college, sixth form education and the train station. During rainfall, the sewage system is frequently overwhelmed and enters the Itchen at Highbridge. We note the statement of common ground between Southern Water and Winchester City Council that these issues can be addressed; however, the Parish</p>

	Council would like the necessary structural solutions and other issues we have raised in this representation tested during the plan examination in order to have the confidence that policy SP2 is sound.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The Parish Council feels that the following evidence base should be tested at inspection to ensure the soundness of policy SP2. Settlement hierarchy – Existing provision of doctor’s appointments, shops, transport, employment Transport Strategy – Public transport links and cycle ways Flooding and Sewage – Solutions to surface water and sewage problems at Brambridge Open space assessment – Current assessment based on out of date population data
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	Devine Homes
<b>Personal reference number</b>	ANON-AQTS-32S5-6
<b>Full reference number</b>	ANON-AQTS-32S5-6/1/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>SP2 fails to consider development sites that border sustainable settlements in neighbouring authorities. As such the strategy is not sound as it fails to allocate sufficient sites to meet identified needs. Spatial Strategy</p> <p>The primary spatial strategy for the growth of Winchester district as proposed in draft Policy SP2 of the Submission Plan builds upon the overarching strategy of the current adopted Local Plan to focus the delivery of housing and economic growth within three spatial areas (including Winchester Town, the South Hampshire Urban Areas, and Market Town and Rural Areas).</p> <p>Whilst this continued approach to growth is generally supported; it is flawed as it fails to consider alternative suitable sites that do not neatly fit into one of these spatial area categories, thereby potentially excluding sites that may perform higher in terms of sustainability and environmental credentials than some other sites. In accordance with the proposed settlement hierarchy (outline in draft policy H3), by virtue of its location at the edge of Winchester's administrative boundary and being disjointed from any of Winchester's defined settlements; the site our client is promoting would presumably be included at the lowest end of the hierarchy, as a site in the 'Remaining Rural Area'. Whilst our client's site would be classified by Winchester's hierarchy as site in a 'rural area' this is plainly not the case owing to the site's sustainable location directly adjoining the defined urban edge of the settlement of Allbrook in the neighbouring borough of Eastleigh. We believe this anomaly is missing the assessment of any site that sits alongside a larger settlement within a neighbouring authority and is clearly going to be highly sustainable as a result. See Figure 2 below which shows the sites proximity to Allbrook, and direct links to the major hub of Eastleigh.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Modifications to the plan should be made to consider the allocation of additional sites (such as Pitmore Road, Allbrook) that adjoin sustainable settlements within neighbouring authorities.
<b>What is your suggested wording or text for the policy?</b>	Additional text within SP2 to include an allowance for sites in 'rural' parts of Winchester to come forward for development if they adjoin sustainable settlements in neighbouring authorities.

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	English Oak Care Homes
<b>Personal reference number</b>	BHLF-AQTS-32EJ-D
<b>Full reference number</b>	BHLF-AQTS-32EJ-D/3/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification.</p> <p>The strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester Town and the South Hampshire Urban Areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, Market Towns and Rural Area, is identified to make provision for 3,850 new homes. The site falls within the Rural Area. Whilst we are supportive that this area will make provision for some housing, as this spatial area covers a large physical area of the district, we believe that the council should be more ambitious in its housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PfSH) area. In particular, given the aging population, the council should be focusing more on the delivery of older persons' and specialist housing in light of the findings of the most recent Strategic Housing Market Assessment (SHMA). The need for additional older peoples housing and dementia care is evidenced by the fact that by 2050 an additional 350,000 older people will potentially need a care home bed. As such, we should be planning for this need now and not at the point it becomes an issue.</p> <p>The development strategy for Market Towns and the Rural Area which sets out that development will be provided in the most accessible and sustainable locations, to support the vitality and viability of communities is supported. However, it is considered that the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities and in particular their elderly and dementia care. Therefore, it is considered that Shedfield is a sustainable settlement which is geographically well located in the PfSH area to accommodate unmet need arising from neighbouring authorities and which is capable of accommodating further development over the plan period. In light of this we would encourage the council to make provision for further homes in the Market Towns and the Rural Area by considering allocating further sites. In summary, we support the Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the market towns and rural areas of the district to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect</p>



	<p>the environment. However, we encourage the council to review the housing provision for this area, in particular the needs for older people and increase it to ensure it is in accordance with the Government's ambitious housing targets over the next five years and beyond. Section 3 of these representations further explores the housing provision for the district over the plan period. see supporting information for further details</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>	<p>Yes</p> <p><a href="#">Form (referring to letter)</a></p> <p><a href="#">Letter (commenting on policies)</a></p> <p><a href="#">Supporting document 1 (need/demand report for Oak Care Village)</a></p>

<b>Policy/Evidence base document</b>	SP2
<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/5/SP2
<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 SP2 Spatial Strategy and Development Principles Fareham Borough Council welcomes the spatial strategy for the South Hampshire Urban Area. The provision of homes and economic growth opportunities in this part of the district will play an important role in helping PfSH to deliver on its economic performance objectives.
<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>	SP2
<b>Name of respondent (or client)</b>	Foreman Homes Limited
<b>Personal reference number</b>	ANON-AQTS-3291-8
<b>Full reference number</b>	ANON-AQTS-3291-8/6/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Strategic Policy SP2 sets out the overall spatial strategy for the district and stipulates the target for new homes in each spatial area. While our detailed comments on the housing numbers are included under representations related to Strategic Policy H1 it is important to note here that all housing requirements must be expressed as a 'minimum', not 'about', in accordance with the clear need to boost significantly the supply of housing. This principle is further emphasised by the recent Written Ministerial Statement of 30th July 2024 'Building the homes we need'. Your Local Plan must take this into account as has been recently demonstrated by the Inspector in the examination of the Bournemouth, Christchurch and Poole Local Plan, and their August 2024 letter to the Council .</p> <p>SP2 fails to recognise the importance of the District's location within the PfSH and the contribution it can, and must, play in securing sustainable development to meet the PfSH needs. In particular PfSH SPS 2023 identifies seven broad areas of search for growth with sufficient capacity for approximately 9,700 dwellings. One of these is 'East of Botley (Winchester)'. The accompanying 'Statement of Common Ground – Broad Areas of Search for Growth Assessments' does not define the geographical extent of the 'Broad Area of Search' however, paragraph 3.5 confirms: Local plans will need to assess the potential suitability and deliverability of the areas of search in more detail, along with other alternatives put forward. This assessment will be informed by more detailed and comprehensive evidence, including the Sustainability Appraisal and Habitat Regulations Assessment and full public consultation with all parties.</p> <p>This area of growth has a strategic role in contributing to the housing shortfall and acute housing crisis that is evidenced within South Hampshire and the spatial strategy must be explicit in promoting this as a mechanism to respond to and accommodate unmet needs in line with NPPF paragraph 11. It is not sound that the Local Plan has not taken a more positive approach to the recommendations of the PfSH SPS. While this was published in December 2023, paragraph 1 of the PfSH Statement of Common Ground – Broad Areas of Search for Growth Assessments confirms work commenced on the framework in 2019. Paragraph 2 further confirms the evidence base of the Broad Area of Search for Growth has been completed by the PfSH Planning Officers Group, a working group comprising planning officers from each of the partner authorities.</p>

	<p>WCC has therefore been involved in the joint-working production of the SPS since 2019. There has been ample opportunity for the Council to assess the potential suitability and deliverability of the area of search East of Botley as part of this Local Plan.</p> <p>The spatial strategy should therefore be amended to align with the PfSH SPS to set the scene for growth in this area of the District, which is outside of the three spatial areas defined in SP2. The area of search must be spatially defined on the Policies Map. It is also noted that SP2 does not align with Policy H3 or paragraph 9.17, which does highlight the future direction of growth East of Botley. The development principles in SP2 should be removed, they duplicate the subsequent development management policies and are consequently unnecessary. PPG makes it clear that all plans need to be focused and concise.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Amend 'about' to 'minimum' when referring to all housing requirements.  Amend SP2 to reflect the PfSH area of search 'East of Botley' and spatially define the area of search on the Policies Map. The area of search should include SHELAA site reference CU08.  Remove the development principles as these are duplicated in subsequent development management policies.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>Amend 'about' to 'minimum' when referring to all housing requirements.  Amend SP2 to reflect the PfSH area of search 'East of Botley' and spatially define the area of search on the Policies Map. The area of search should include SHELAA site reference CU08.  Remove the development principles as these are duplicated in subsequent development management policies.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on Policies and Evidence Base - includes tables)</a>  <a href="#">Supporting document 1 (Letter re: SHELAA site CU08)</a>  <a href="#">Supporting document 2 (Location Plan)</a>  <a href="#">Supporting document 3 (Concept Plan)</a>  <a href="#">Supporting document 4 (Illustrative masterplan)</a>  <a href="#">Supporting document 5 (Access and Transport Report)</a>  <a href="#">Supporting document 6 (Landscape and visual study)</a>  <a href="#">Supporting document 7 (Flood Risk Assessment &amp; Conceptual Drainage Strategy)</a>  <a href="#">Supporting document 8 (Interim Ecology Assessment)</a>  <a href="#">Supporting document 9 (Biodiversity Net Gain Feasibility Report)</a></p>

	<a href="#"><u>Supporting document 10 (Statutory Biodiversity Metric)</u></a> <a href="#"><u>Supporting document 11 (Preliminary Noise and Vibration Summary)</u></a> <a href="#"><u>Supporting document 12 (Vision Statement - Land at Station Hill, Botley)</u></a>
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<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Georgina Cox
<b>Personal reference number</b>	BHLF-AQTS-328Q-7
<b>Full reference number</b>	BHLF-AQTS-328Q-7/11/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Gladman support the spatial strategy for growth within Winchester, growth has been distributed equally accordingly between Winchester Town and South Hampshire Urban Areas, while a significant level of growth has also been directed to Market Towns and Rural Areas with 3,850 new homes being proposed. The distribution has allowed sustainable settlements to accommodate growth in line with the proposed settlement hierarchy.</p> <p>Gladman support the range of development principles that support policy SP2 and deliver high quality homes that are designed to be sensitive to the character and setting of the development sites' local area. Further to this Gladman acknowledge WCC is working increasingly hard to tackle Climate Change and its associated challenges faced within the District. With this in mind, Gladman delivers highly sustainable developments through incorporating energy efficient design principles throughout development sites as well as ensuring sites are accessible to nearby services, facilities and employment through an array of public transport options, improved cycling routes and integrated pedestrian routes.</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="#">Form (refers to letter)</a> <a href="#">Supporting information (commenting on policies and proposed site)</a></p>
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<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Gleeson Land
<b>Personal reference number</b>	ANON-AQTS-3299-G
<b>Full reference number</b>	ANON-AQTS-3299-G/12/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The spatial strategy for the south of the district focuses housing development in the South Hampshire Urban Areas in two sustainable new neighbourhoods at Newlands (West of Waterlooville) and North Whiteley (Whiteley). However, there are rural settlements (smaller, intermediate or larger) in this part of the district which also have their own local housing needs which should be addressed.</p> <p>Further, the Local Plan does not provide a breakdown between the housing identified for its own local need and the small contribution of 1,900 homes to the wider unmet needs of the Partnership for South Hampshire (PfSH). Instead it takes the view that any of the housing identified can either be used to meet the local housing need or wider unmet needs. However, we consider there should be a clear distinction drawn between the two. This is to ensure that local residents in rural communities have their own needs met and they are not displaced by those with unmet needs outside of Winchester district, because insufficient homes have been built to accommodate their needs in the wider PfSH area.</p> <p>In this context, we consider the Council should explore other spatial options to increase the quantum of housing that Winchester district delivers to provide greater assistance to the unmet housing needs of the PfSH to ensure that, in reality, the needs of local people, especially those with housing needs in the rural communities, are not unmet. This is because the Council does not in any sense demonstrate (against Para 11 or any other policy test) that it is unable to allocate any further land to address wider needs.</p> <p>Policy SP2 specifically states that “Development proposals will be expected to make efficient use of land and prioritise the use of previously developed land/buildings in accessible locations, in accordance with the development strategies set out in this Plan.” This is explored in more detail in our response to Policy H2, but whilst national policy seeks to make as much use as possible of previously developed or ‘brownfield’ land (NPPF paragraph 123), this should not prohibit the ability of greenfield land to be developed, especially when insufficient land is being allocated for development to meet housing needs across the PfSH. There does not appear to be any housing trajectory produced as part of this local plan which clearly states which of its housing allocations are expected to deliver when and at what rates, despite the NPPF paragraph 75 specifically indicating one should be produced. Without this evidence, it is not possible to know if the housing</p>

	trajectory is based on deliverable and developable sites that have a realistic or reasonable prospect of coming forward, and if a five-year supply of deliverable land can be maintained, on brownfield or greenfield land.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The spatial strategy on which the plan is based is flawed. It does not go far enough to help meet the unmet housing needs of PfSH; on this basis it is not positively prepared or effective. Furthermore, it is not inconsistent with national policy, NPPF paragraph 75.
<b>What is your suggested wording or text for the policy?</b>	N/A – the spatial strategy as a whole is flawed.
<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	Hannah Young
<b>Personal reference number</b>	BHLF-AQTS-32QC-J
<b>Full reference number</b>	BHLF-AQTS-32QC-J/3/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Paragraph 11b of the NPPF makes it clear that strategic policies should plan to meet objectively assessed needs unless other policies in the Framework provide a strong reason for restricting development, or any adverse impacts would significantly and demonstrably outweigh the benefits. The Local Plan’s housing need figure is currently 15,465 up to 2040; this includes the needs of the District and an unmet needs allowance of 1,900 as a contribution towards the unmet needs of neighbouring areas in South Hampshire. We are pleased to see the Council is looking to meet the development needs over the Plan period in this Local Plan consultation (identified in Policy H1), and look to take a proportion of the unmet needs figure within South Hampshire. However, there are opportunities for WCC to deliver more housing through this Plan, and it is disappointing to see the Council not planning more proactively to take more of this unmet need.</p> <p>There are available sites which are suitable for development, such as the site East of Station Hill (Site CU15), which could come forward for development. The language used within the Plan i.e. “in the spirit of cooperation” indicates that the Council has explored to the full extent additional housing it could accommodate. As noted in the Integrated Impact Assessment (IIA), Winchester’s house prices are significantly less affordable than the average for England and Wales, reflecting the high number of residents who commute to London for work. Rental prices in the District are the most expensive outside London. High house sale and rental prices will make it increasingly difficult for younger people and people with lower incomes to enter the property market and continue the trend for workers in lower paid jobs in Winchester City commuting in from Southampton, Eastleigh, Fareham and other settlements to the south of the District. We agree with the conclusions made in the IIA that a focus on meeting local housing need is critical in the delivery of affordable housing, supporting communities health and wellbeing, strategic infrastructure delivery and the local economy. If the District is looking to increase affordability it is important that it delivers its own development needs. Indeed, whilst potentially covered by the transitional arrangements it would be sensible for WCC to seek to achieve figures closer to those stemming from the new Standard Method to achieve this goal. Whilst supportive of the fact the council is seeking to meet its need as a minimum, we have some concerns regarding the approach to the spatial strategy as outlined below.</p>

	<p>We encourage the Council to consider any other reasonable options to identify additional sites in sustainable locations within the Market Towns and Rural Area, such as the site east of Station Hill. This is extremely sustainable and its allocation would further boost the supply of housing. The need to ensure a robust and consistent supply of housing should be given particular weight in the decision making process when identifying the spatial strategy of the Plan. Reliance on large scale, strategic allocations are risky given their delivery can often stagnate due to wider market factors and associated requirement to deliver significant infrastructure; as summarised in further in the sub-section below. In any case, these large allocations need to be supplemented by significant supply of small and medium scale sites which can be delivered in the short and medium term, to ensure a sufficient supply in the early years of the Plan. We encourage the Council to identify any other reasonable additional sites that could be allocated to boost the supply of housing and focus on delivering the housing required, based on the Standard Methodology, to meet Winchester Districts', and the wider South Hampshire's needs. The need to ensure a robust and consistent supply of housing should be given particular weight in the decision making process when identifying the strategy. Focus on other sustainable sites should be given further attention. Greater weight should have been provided to sites in close proximity to key public transport nodes, such as railway stations.</p> <p>Indeed, we note that one of the overarching principles contained within the Local Plan Vision for new development is the "concept of 20 minute neighbourhoods and active travel is ensuring that development is connected to public transport rights of way and cycleways". Further, SP2 (iii) recognises that the new homes in the market towns and rural areas should be serving local needs in the most accessible and sustainable locations. Part (vi) states that development should make use of public transport... and integrate the development of homes, jobs, services and facilities to reduce car use. Suitable sites next to railway stations should be afforded significant weight. In this respect, it is also noted, as mentioned above, that in considering options for strategic growth, the PfSH is identifying sites around smaller settlements to accommodate growth as the appropriate spatial strategy. We consider that the IIA should have considered sites in this broad area as a starting point.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Harding Holding Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QY-8
<b>Full reference number</b>	BHLF-AQTS-32QY-8/7/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	There is no Sustainable Development Policy within the plan. This is not the Sustainable Development Policy despite being referred to as such within the plan. This policy is titled, "Spatial Strategy and Development Principles" and sets the broad principles for development in this district. It is recommended that the Council amend the policy wording to explicitly state that the Council is committed to delivering sustainable development. Harding Holding supports the principles set out in SP2 however it does not agree that the Council has planned for sufficient housing for their own needs and those of adjoining districts and boroughs with unmet need. Not does it provide sufficient housing for the growing housing need nor does it provide a sufficient number of homes to deliver the requirement of affordable housing which currently is published to stand at 1,579 households. The policy does not have Sustainable Development at its heart or core.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	Yes <a href="#">Form (refers to letter)</a> <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Supporting information (Map)</a>

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Hathor Property
<b>Personal reference number</b>	ANON-AQTS-32T7-9
<b>Full reference number</b>	ANON-AQTS-32T7-9/9/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy SP2 Spatial Strategy and Development Principles The broad intention of the Policy and related distribution of growth is supported. It is agreed that the Market Towns and Rural Areas, including Sutton Scotney as an Intermediate Village, can deliver housing, economic and community development that serves local needs in the most accessible and sustainable locations. However, the Plan does not provide for a sufficient level of housing to meet needs. In addition, some of the specific sites identified within the Plan will not deliver the anticipated level of housing either within the five year period or the broader plan period. This is considered in further detail below against relevant policies.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a>



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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Helen Dawson
<b>Personal reference number</b>	ANON-AQTS-32ZJ-2
<b>Full reference number</b>	ANON-AQTS-32ZJ-2/2/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	This form is too hard to respond to. I consider that I have been unable to express my opinion on this form which is not fit for purpose for navigating a 572 page document.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Henrietta Boucher
<b>Personal reference number</b>	ANON-AQTS-3BFT-8 - Crawley Parish Council
<b>Full reference number</b>	ANON-AQTS-3BFT-8 - Crawley Parish Council/6/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	vi: Whilst the principles outlined in Strategic Policy SP2 vi. are good for those who live within Winchester itself, Crawley Parish Council believes the Local Plan does not currently fully or realistically consider the actual transport needs of residents who live in smaller villages and hamlets in the countryside. Residents need and use cars (increasingly electric) for work and leisure.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The principles need to recognise rural car use and should include something about supporting the changeover to electric vehicles and cars.
<b>What is your suggested wording or text for the policy?</b>	Where alternatives to car usage are not feasible in rural locations, the use of electric vehicles will be encouraged.
<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	Ibex Homes Limited (Simon Harding)
<b>Personal reference number</b>	BHLF-AQTS-32QE-M
<b>Full reference number</b>	BHLF-AQTS-32QE-M/4/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>OBJECT There is no Sustainable Development Policy within the plan. This is not the Sustainable Development Policy despite being referred to as such within the plan. This policy is titled, “Spatial Strategy and Development Principles” and sets the broad principles for development in this district. It is recommended that the Council amend the policy wording to explicitly state that the Council is committed to delivering sustainable development.</p> <p>Ibex supports the principles set out in SP2 however it does not agree that the Council has planned for sufficient housing for their own needs and those of adjoining districts and boroughs with unmet need. Not does it provide sufficient housing for the growing housing need nor does it provide a sufficient number of homes to deliver the requirement of affordable housing which currently is published to stand at 1, 579 households. The policy does not have Sustainable Development at its heart or core.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (commenting on letter and proposed site)</a></p>

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

Supporting information (Location Plan)

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	John Boyes
<b>Personal reference number</b>	ANON-AQTS-32ND-G
<b>Full reference number</b>	ANON-AQTS-32ND-G/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The proposals fail to comply with SP2 on multiple points. The hierarchy employed to determine the number of new dwellings for Colden common is out of date and seriously flawed. Colden Common has been grouped with Wickham and Bishops Waltham on population. Wickham has square with two large convenience stores, a butcher, a hardware store and numerous other shops, pubs, and a hotel. Bishops Waltham has a 'high street' with a similar variety of shops to Wickham. Colden Common by contrast has one small convenience store (Less than 200Mtrs Sq.) and three pubs. Colden Common also has a pharmacy with a doubtful future. The hierarchy has included the open space created by the recent Sandyfields/Kingsgate development but failed to include the increase in population. The local plan gives the population of Colden Common as 3987 whilst the 2021 census (taken before Sandyfields/Kingsgate was fully populated) shows the population as 4306.</p> <p>The proposed developments in Colden Common (Clayfield site CC01, Church Lane CC15, Colden Common Farm CC02 and land at Main Road CC04) will yield circa 150 homes. Based on ONS occupancy, it is forecasted that after the new housing contained in the Local Plan is occupied, the population of Colden Common will increase by over 500. None of the preferred sites offer any amenity value to the village. In addition to the inadequacy in retailing, Colden Common already suffers a deficit in open space. By Winchester City Councils' own figures, Colden Common, for size of population, already has a deficit in 1. allotments, 2. informal green space, 3. play areas, and 4. park/recreation grounds. With the proposed increase in population these deficiencies will increase significantly. We have a surplus of natural green space as we are a rural village, but this does not constitute usable space. Colden Common also has a sports facility, but this is quarter of a mile up a lane and for most of the village does not meet the twenty-minute neighbourhood criteria. Colden Common suffers significant flooding in the Brambridge area, resulting in raw sewage flooding the roads and residents' gardens. This untreated effluent eventually drains into the River Itchen at Highbridge. Southern Water have installed an above ground storage facility and have been employing tankers to carry effluent to the nearest sewage works at Eastleigh. This solution is unsustainable. In extreme downpours this creates an increase in HGV traffic through the village resulting in increased danger for pedestrians and a reduction in air quality. Southern Water have been carrying out investigations to</p>

	establish the causes of the flooding but have not published their findings. Colden common has a combined foul sewer and surface water network.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>No further development should take place in Colden Common until the issue of sewage flooding is resolved. The deficit in open space is addressed and new retailing facilities can be established.</p> <p>None of the preferred sites offer any amenity value for the village. If development must take place, then alternative sites should be considered. Development to the east of the B3354 is a very unsound option. The B3354 is carrying increasing high volumes of traffic particularly during rush hour. This traffic density will inevitably increase as Eastleigh Borough Council progress the developments to the south of Horton Heath. The continual increase in traffic on the B3354 will inevitably create a divide between any eastern developments and rest of the village. This does not align with WCC policy of place making.</p> <p>Although not initially favoured by the residents of Colden Common, the areas to the west (CC03/CC03B) and north (CC05) of the village should be explored. The owner/developers of CC03/CC03B have approached the parish council with a proposal that for supporting development of CC03, they would gift CC03B to the parish to become open space. (Refer to parish clerk for confirmation). This would address the issues of open space deficiency and provide land for the parish council to develop much need allotment space. It would also provide land for additional retail space to be developed. Development on the western boundary of the village would make the current retail facility and the community centre more central, creating an environment of inclusivity.</p>
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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



<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Joseph Lynch
<b>Personal reference number</b>	ANON-AQTS-323Y-A
<b>Full reference number</b>	ANON-AQTS-323Y-A/1/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Please see representations emailed to the Planning Policy team. - Representation is in regards to a site at Wickham Park which they would like to be included as an allocation in the Local Plan. The supporting document is 215 pages long and cannot be summarised here.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies and proposed site)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Judith Anne Polak
<b>Personal reference number</b>	ANON-AQTS-32TW-9
<b>Full reference number</b>	ANON-AQTS-32TW-9/5/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>The allocation of development for market towns and rural areas is based on a flawed settlement hierarchy assessment as it is not weighted to allow for the fact that rural doctor's surgeries cover a huge area yet are allocated the same value a city centre surgery which has a much smaller catchment area.</p> <p>This conflicts with policy T1 which encourages sustainable and active travel. Those in rural areas have no choice but to drive to the nearest surgery.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Revise the methodology and measurement of the hierarchy assessment to make it meaningful and applicable to rural areas.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32TM-Y
<b>Full reference number</b>	ANON-AQTS-32TM-Y/2/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Strategic Policy SP2 sets out the overall spatial strategy for the district and stipulates the target for new homes in each spatial area. While our detailed comments on the housing numbers are included under representations related to Strategic Policy H1 it is important to note here that all housing requirements must be expressed as a 'minimum', not 'about', in accordance with the clear need to boost significantly the supply of housing. This principle is further emphasised by the recent Written Ministerial Statement of 30th July 2024 'Building the homes we need'.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend 'about' to 'minimum' when referring to all housing requirements.
<b>What is your suggested wording or text for the policy?</b>	Amend 'about' to 'minimum' when referring to all housing requirements.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Supporting information (comments on policies)</a>

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Laura Cornborough
<b>Personal reference number</b>	ANON-AQTS-32TQ-3
<b>Full reference number</b>	ANON-AQTS-32TQ-3/2/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Strategic Policy SP2 sets out the overall spatial strategy for the district and stipulates the target for new homes in each spatial area. While our detailed comments on the housing numbers are included under representations related to Strategic Policy H1 it is important to note here that all housing requirements must be expressed as a 'minimum', not 'about', in accordance with the clear need to boost significantly the supply of housing. This principle is further emphasised by the recent Written Ministerial Statement of 30th July 2024 'Building the homes we need'.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend 'about' to 'minimum' when referring to all housing requirements.
<b>What is your suggested wording or text for the policy?</b>	Amend 'about' to 'minimum' when referring to all housing requirements.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Supporting information (comments on policies)</a>

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/46/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy sets the overall strategy and principles for the development put forward in the Plan. It sets out seven criteria for new development to meet and refers to the Sir John Moore Barracks (SJMB) as a key site in the Winchester Town spatial area. The policy provides the strategic framework for more detailed policies. Policy SP2 includes a housing requirement of 5,640 new homes for Winchester Town. The requirement is part of the district wide housing figure which includes an allowance for potential requests from adjoining authorities regarding their unmet need, non-delivery of allocated sites or shortcomings in other forms of supply. The calculation of the district-wide allowance of 1,900 is not clear or its impact on the Winchester Town housing requirement. The increase on the standard methodology figure has not been justified. The Parish Council is concerned that the figure for Winchester Town places unnecessary and unjustified pressure on the Sir John Moore Barracks site to accommodate more homes resulting in the loss of land of ecological importance. Support Policy SP2 criteria iv-x. Object to Policy SP2 criteria i) the housing requirement for 5,640 new homes has not been justified.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Amend the housing figures for each housing strategy area by removing that element of the 1,900 buffer from each.
<b>What is your suggested wording or text for the policy?</b>	Amend the housing figures for each housing strategy area by removing that element of the 1,900 buffer from each.
<b>Do you agree with how the 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)</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>	SP2
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/8/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>We welcome the reference to alignment with the Local Nature Recovery Strategy in draft Strategic Policy SP2: Spatial Strategy and Development Principles. We particularly welcome the emphasis on support for enhancing environmental assets and addressing the impact of climate change, with reference to the implications for green infrastructure, flooding and the water environment. This will be critical for delivering our national goal to halt species decline and facilitate species recovery under the Environment Act 2021, and in line with the key conclusions of the Lawton review. To ensure this is given due and proper regard in relation to the obligations of the Environment Act 2021 and the Levelling Up and Regeneration Act 2023's requirement for LPAs "to take account of", local nature recovery priorities and measures in spatial planning, we strongly recommend that the Council commits to the creation and maintenance of a functioning nature recovery network, as this is a key mechanism through which the biodiversity of the district can be protected and enhanced, and ensures this is fully reflected and embedded in the wording of Strategic Policy SP2: Spatial Strategy and Development Principles. The Nature Recovery Network, now embedded within national policy through the Environment Act, is the key national mechanism to deliver nature's recovery and must be clearly supported through the Local Plan, in order to support the delivery of local nature recovery priorities, the enhanced duty to conserve and enhance nature, and meet the Government's 25 Year Environment Plan targets. Nature recovery network mapping is about taking a strategic spatial approach to the natural environment, identifying areas of existing value, and looking for opportunities to create connections with new habitats that will benefit people and wildlife. Without such spatial mapping, it will not be possible to identify where interventions are required to create a nature recovery network and thus deliver the Government's environmental policy ambition. Therefore, we strongly recommend that the Council prepare and use the Nature Recovery Network, and Local Nature Recovery Strategy, as foundational tools for the Local Plan to:</p> <ul style="list-style-type: none"> <li>• Identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network, including: existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing ecological network that, if filled, would improve ecological</li> </ul>

	<p>connectivity and reduce fragmentation. Assess, identify and prioritise opportunities for ecological enhancement through local land management plans and strategies.</p> <ul style="list-style-type: none"> <li>• Identify the best sites for development and those areas where development should be avoided. Sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network.</li> <li>• Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network. Inform and target biodiversity net gain delivery and other nature-based solutions.</li> <li>• Inform the use of building standards that promote biodiverse developments within local plans (e.g. Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature.</li> <li>• Send a clear market signal to developers of expectations for all future planning to contribute positively and meaningfully to nature's recovery. The Nature Recovery Network and Local Nature Recovery Strategy should guide where development should not take place to avoid severance of the landscape and ecological corridors.</li> </ul> <p>We recommend these changes to ensure a clearer, more-direct regard is given to local nature recovery priorities in planning (as required by the Levelling Up and Regeneration Act 2023). The current, more generic, wording of the policy is not sufficient to ensure adequate consideration of the LNRS is embedded in the Plan, and that the associated measures, priorities and spatial elements of the LNRS are fully, and duly, considered. For more information on Nature Recovery Network, we recommend reading the South East Nature Partnerships' 'Principles of Nature recovery Networks across the South East of England' document, available here: <a href="https://hantswightlnp.files.wordpress.com/2021/07/joint-south-east-nrn-principles-senp.pdf">https://hantswightlnp.files.wordpress.com/2021/07/joint-south-east-nrn-principles-senp.pdf</a></p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b></p>	<p>Yes <a href="#">Form (refers to letter)</a></p>

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

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Mandy Owen (Boyer) on behalf of Vistry Partnerships
<b>Personal reference number</b>	ANON-AQTS-32GC-8
<b>Full reference number</b>	ANON-AQTS-32GC-8/9/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Winchester Town is the largest settlement in the District and provides a clear basis for the continued direction for strategic planned growth through the next plan period. We therefore recommend and support that a larger number of homes be allocated to Winchester to reflect its status as the largest settlement and its importance in terms of connecting the District to surrounding locations and destinations. A further benefit of allocating additional sites at Winchester Town is the reduction in need for people to commute to jobs or transport facilities within the Town and subsequent reduction in carbon emissions, thereby supporting the emphasis on the climate emergency throughout the draft Local Plan. Development in Winchester would also support the viability of the town centre and its role as the main service centre and job provider in the District. Concerned by the strategy presented. Firstly, as detailed in our representations on Policy H1, the sources of housing supply currently identified in the Plan will not meet the identified housing requirement. Moreover, whilst the Council has accelerated the commencement of the Regulation 19 consultation, in the hope of having the Plan examined under the current December 2023 NPPF and the current Standard Method, it is ultimately unlikely to escape the necessity of having to allocate many new sites for residential development, in addition to those currently proposed for such. This is, of course, in addition to addressing unmet needs arising in partner Local Authorities, where the Standard Method is also expected to rise.</p> <p>Therefore, whether through changes made before the Plan's submission, Main Modifications arising from the Examination or via an immediate review (if the Plan is found to be sound), the Council is going to have to plan proactively to deliver a far higher level of housing than is presently envisaged. This calls into question the soundness of the spatial strategy and development principles presented in Policy SP2. This is to say that even if the Plan is capable of adoption in 2025, as the Council hopes, its spatial approach risks becoming redundant almost from the outset of the plan's adoption. On this basis, the Council will find itself needing to allocate new strategic allocations/strategic growth areas to meet the dramatically higher housing targets that arise from the Government's proposals. These new strategic sites will invariably take a long-time to come forward. The Council should therefore be looking positively to proceed on the basis of balancing delivery of much needed new homes through the allocation of both large strategic scale sites and an extensive suite of</p>

	<p>small/medium-sized sites. These small/medium-sized sites can be brought forward more easily as self-contained developments, thereby offering a consistent supply throughout the Plan period.</p> <p>Achieving a balanced supply is also essential when it is remembered that the current Development Plan (LPP1) has not been effective at consistently sustaining a housing land supply or delivering against its targets throughout the Plan-period. This is partly because the reliance upon strategic allocations has resulted in delayed delivery compared to anticipated trajectories. The challenges for delivering large-scale allocations are well-documented, with infrastructure requirements, the need for strategic masterplanning and multiple landownerships/land interests acting together (often in combination) to impede timely implementation. Indeed, LPP1 required 12,500 dwellings over the Plan's 20-year period (or 625 dpa). Over the first 9 years of the Plan 4,640 dwellings were completed (1,000 dwellings short of the total requirement of 5,625 homes for this period). It is also notable that the LPP1 trajectory expected 6,548 dwellings to be completed for this 9-year period (2011/12 to 2019/20), but actual completions fell nearly 2,000 short (i.e. 1,908 dwellings below what the Plan had expected). We advocate the Local Plan should be modified (at this stage) to include additional sites at Winchester. Land at Pitt Vale provides an opportunity as a medium sized site to contribute towards the Council's housing supply and prompt delivery in the early stages of the plan period. This is essential to start future-proofing the new Plan in anticipation of the fundamental change in the level of housing that will need to be provided should the Government's consultation proposals be implemented (as seems highly plausible, given manifesto commitments and the strength of the parliamentary majority).</p> <p>Notwithstanding the impending changes to national policy and housing targets, we encourage the council to take the opportunity through the new plan to avoid the same delayed housing delivery situation arising again through the next plan. Therefore, the identification and allocation of additional medium and smaller sites for allocation at Winchester Town now is of paramount importance for the success of the new Draft Local Plan's strategy and delivery.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>It is important that the draft Local Plan provides sufficient diversity in its housing site allocations, in particular providing a range of site sizes and locations.</p> <p>Particular emphasis should be placed on medium and smaller sized sites at Winchester Town to prevent continuing delayed and under delivery in the district's most sustainable settlement.</p> <p>Vistry Partnerships recommends the draft Local Plan should allocate additional sites which are immediately available and deliverable.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>No specific wording is proposed. Policy SP2 cannot be rendered sound through simple modifications to its wording, a more significant review is required to the spatial distribution with greater number of homes allocated in Winchester.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Mark, Adam and Nick Welch
<b>Personal reference number</b>	ANON-AQTS-32SJ-U
<b>Full reference number</b>	ANON-AQTS-32SJ-U/9/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Policy SP2 Spatial Strategy and Development Principles The broad intention of the Policy and related distribution of growth is supported. It is agreed that Winchester should be a key focus for growth, acknowledging its role as the largest settlement in the District with by far the most extensive range of facilities and services and access to mainline railway station. It has the greatest potential therefore to deliver sustainable growth and realise the ambition of 20 minute neighbourhoods. However, the Plan does not provide for a sufficient level of housing to meet needs. In addition, some of the specific sites identified within the Plan will not deliver the anticipated level of housing either within the five year period or the broader plan period. This is considered in further detail below against relevant policies.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes <a href="#">Letter (commenting on policies and evidence base re: Land at Harestock Road)</a>



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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Messrs Jenssen & Collins
<b>Personal reference number</b>	BHLF-AQTS-328P-6
<b>Full reference number</b>	BHLF-AQTS-328P-6/3/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	We support the approach in draft policy SP2 to make “efficient use of land” and “in accessible locations”. We also support the removal of “within existing settlements” (which was included in Reg18) as it fails to recognise the development potential of all land in sustainable and accessible locations unless settlement boundaries are reviewed/amended, or additional land allocated for housing.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form 1 (OT01 and H2)</a> <a href="#">Form 2 (H4)</a> <a href="#">Form 3 (Settlement Boundary review - Otterbourne)</a> <a href="#">Form 4 (SP2)</a>

<b>Policy/Evidence base document</b>	SP2
<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/17/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	As per the communications and engagements throughout the Local Plan process between Winchester City Council and the ICB, the NHS will be seeking contributions ensuring that there is sufficient primary care capacity to meet the needs of the proposed site allocations. This is supported by Strategic Policy SP2 (pages 23 and 24) which states: In delivering the district's housing, employment and community requirements development proposals will be expected, where appropriate, to: x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.
<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>	SP2
<b>Name of respondent (or client)</b>	Mr & Mrs Painter
<b>Personal reference number</b>	ANON-AQTS-327T-9
<b>Full reference number</b>	ANON-AQTS-327T-9/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The spatial strategy of the Plan is set out in Policy SP 2 with the spatial housing distribution addressed in Policy H3. Policy SP2 identifies 3 spatial areas and the development principles for each. One of the 3 spatial areas is the 'Market Towns and Rural Area' (MTRA) which is expected to make provision for 3,850 new homes over the plan period. It is noted that elsewhere in the Plan the MTRA is referred to as accommodating 3825 homes, including in Policies H1 and H3. Clarification is sought from the Council as to which figure it should be but for the purposes of this Statement the figure of 3825 will be used.</p> <p>Policy SP H3 identifies that 1,375 new homes will be provided by the market towns of New Alresford and Bishop's Waltham, equating to 36% of the MTRA supply. Both towns are well connected community and economic hubs with extensive rural catchment areas, supporting a wide range of services and facilities. In the Settlement Hierarchy Background Paper both settlements are ranked equal second in terms of facilities and services, only 5 points behind the sub regional centre of Winchester Town. Such locations seem logical sustainable places to accommodate significant future growth and this is recognised in the Settlement Hierarchy Background Paper which states "Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because residents would be able to access a greater range of services and facilities more easily, without the need to travel by private car which is the least sustainable form of transport and which adds most carbon emissions, the reduction of which is a key council objective in achieving carbon neutrality by 2030."</p> <p>Given the sustainable nature of these settlements it would be expected that they would accommodate significant growth levels in the emerging plan, especially in the period 2024 to 2040. Disappointingly, the Council has limited its ambitions in relation to the Bishops Waltham and New Alresford which are only accommodating 9% of the Plan's total housing provision. Furthermore, Policy H3 and Paragraphs 14.10 and 14. indicate that the Council is largely relying on existing allocations, commitments and built developments to accommodate future growth up until 2040, rather than new sites. Confusingly, there are almost 3 times as many houses coming through new sites in the less sustainable Larger Rural Settlements than in the Market Towns and even the Intermediate Rural sites (which are two</p>

	<p>layers down in the hierarchy) are providing a similar level of houses from new sites as the two Market towns. In terms of allocating new sites in Bishops Waltham and New Alresford, the Council asked Parishes to only identify new sites for 100 to 120 homes for the period from 2024 to 2040. It is unclear why this limit was placed on the Parishes and why the Plan relies so heavily on existing commitments. It is also unclear why windfalls were seen as delivering 90 dwellings in each settlement, an almost identical amount to the 100 new home allocation in both locations (Paras 14.10 &amp; 14.28).</p> <p>The current approach reads as a lack of commitment to deliver future sustainable growth in these two market towns. Bishop's Waltham in particular is capable of accommodating additional new housing developments in a sensitive and sustainable way and the Council should reassess the ability of this settlement to accommodate higher housing growth. Overall, the spatial approach in relation to the Market Towns appears timid and is not considered to be justified or positively prepared.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Supporting Document (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Mr N Craig-Harvey
<b>Personal reference number</b>	BHLF-AQTS-32ED-7
<b>Full reference number</b>	BHLF-AQTS-32ED-7/3/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The development of this site, through an appropriately designed scheme and comprehensive landscaping strategy would promote the vitality and viability of Littleton whilst maintaining the rural character and individual settlement, as required by this policy.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (copy of form - refers to letter)</a> <a href="#">Letter (commenting on policies and site promotion)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Mrs Anne Collins
<b>Personal reference number</b>	BHLF-AQTS-328N-4
<b>Full reference number</b>	BHLF-AQTS-328N-4/1/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The STA submitted as supporting evidence for the Draft Local Plan Regulation 19 consultation fails to address the requirements for such assessments and therefore fails to support delivery of Policies SP2 and T1 in the draft Local Plan. It not enough for WCC to state that public transport will be considered at individual development plan stage. NPPF and WCC Plan Policy T1 clearly state that it will be considered 'at every stage of the development'. See further detail in supporting document.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Form (Copy of form - refers to letter)</a> <a href="#">Letter (Commenting on policy and evidence base)</a>



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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B54-Q
<b>Full reference number</b>	ANON-AQTS-3B54-Q/4/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Blenheim Strategic Partners agree with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. It is emphasised that all three spatial areas are critical to delivering on the district's growth requirements. However, whilst the provision of 3,850 homes within Market Towns and Rural Areas will contribute towards sustainable housing delivery within the Borough, there is clearly a need for greater provision within the area. This is to:</p> <ol style="list-style-type: none"> <li>1) Reflect a plan period of 2024 – 2040, removing any manipulation of the housing requirement/provision which seeks to suppress forward delivery, and instead plan for a position which fully meets the objectively assessed need comprising Winchester's own standard methodology local housing need and making an appropriate provision to accommodate unmet need from the South Hampshire sub-region.</li> <li>2) Helps to better address the affordability challenge.</li> <li>3) Secures a demonstrable five-year supply on adoption of the plan</li> </ol> <p>Additionally, in stipulating a target for new homes in each spatial location, any such target must not be considered as a maximum, but a minimum. Whilst it is noted that the policy wording as currently drafted states 'for about', suggesting these are not fixed targets, it is considered that the policy wording should be clear, i.e., that these are minimum targets. In this context, the allocation of land north of Rareridge Lane becomes ever more important. It is situated within the Market Town of Bishop's Waltham and will contribute 100 dwellings towards this target as per draft Policy BW4.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Targets should be expressed as minimums and revised upwards according to the evidence of need. (associated changes would be needed with respect to Policy H3)
<b>What is your suggested wording or text for the policy?</b>	Targets should be expressed as minimums and revised upwards according to the evidence of need. (associated changes would be needed with respect to Policy H3)

<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/6/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>BSP agree with the principle of supporting the delivery of new housing and economic growth across the three identified spatial areas. In stipulating a target for new homes in each spatial location however, it is highlighted that any such target must not be considered as a maximum, but a minimum. Part ii) specifies provision for 5,650 new homes in the South Hampshire Urban Areas, however this principally comprises existing allocations and commitments, and a disproportionate reliance on a select few large allocations and windfall sites. Only 500 homes via new allocations are proposed, representing just 8.8% of the proposed spatial allocation for South Hampshire Urban Areas. This in the context of the unmet need across the PfSH area is wholly inadequate. An over-reliance on sites already contained within the current plan does not represent an ambitious or positive basis for South Hampshire Urban Areas into the future. It also leads to the unjustified approach of seeking to manipulate delivery such that the trajectory can be balanced out (see Housing Topic Paper re phasing).</p> <p>The result has added to the chronic affordability challenge within the district, as set out in the SHMA (July 2024). Delayed delivery does not justify a restrained approach to future provision, which will only serve to further compound the district's affordability pressures. NPPF paragraph 11 states that 'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.' The Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement to address this.' It is noted that the PfSHs Position Statement dated December 2023 outlined that it, 'has taken an approach which is flexible and can be adjusted in future years should these proposals in this latest Government consultation come into practice, and the policy framework within which PfSH operates changes significantly. Much of this updated unmet need arises in the eastern part of the sub-region and it would be appropriate for the southern part of Winchester district to accommodate a significant element of this need, not only as a consequence of the geographical proximity but also the strategic road and rail links that already exist. The South Hampshire Urban Areas can make a further contribution to housing numbers, and the Reg 19 plans recognises that North Whiteley is a sustainable neighbourhood for delivering housing and economic growth. As such, the IIA has failed to positively consider alternatives which would expressly meet more of the</p>

significant unmet need identified. In this context, land at Fairthorne Grange could make a significant contribution towards housing delivery. It represents an exciting opportunity to provide high-quality family and affordable homes of the highest environmental standards within a landscape-led masterplan. It has the potential to set the benchmark for future development in the district, with its emphasis on high quality materials, energy efficiency and environmental enhancement. Significantly, the development of the site could conclude the urban/rural edge of the new Whiteley community, tying into the new infrastructure provided with the new community and utilising the strong natural boundary of Shawfords Lake as the settlement edge, transitioning to the rural area.

Allocation and development of the site should be viewed positively in reducing the pressure to secure/accommodate additional development beyond Shawford Lake, around the rural village of Curdrige, in an area which remains under intense development pressure (as evidenced by the Winchester SHELAA), given its relationship to Botley. Importantly, development in this location would not alter the settlement identity of either Curdrige or Botley, they would remain set within the rural gap between the two wooded water course corridors (River Hamble and Shawford Lakes). The villages would maintain their existing rural character, presenting the opportunity for a stronger defence to maintaining that prevailing character and settlement hierarchy. Conversely, development on the edge of Curdrige, adjacent to the settlement boundary, would start to change and undermine the character of the village, and, having started the process of change, potentially lead to pressure for a greater urbanisation of the area between Shawford Lake and Botley / Botley Station. The aspirations of the emerging Local Plan, including carbon neutrality, biodiversity and natural environment, homes for all and promoting sustainable transport and active travel are fundamental to the development vision at Fairthorne Grange. In delivering on these aspirations, the site provides a unique opportunity to enhance and reinforce the Shawfords Lake corridor through new woodland planting and biodiversity enhancements, which will be accessible for the local community to enjoy and experience. Further, and as indicated above, it will complement and align with the wider strategic ambition for the North Whiteley development, with the site as well as accommodating housing, providing an enhanced, landscape-led gap to the northern edge of North Whiteley which will be protected for the long term, whilst also promoting sustainable linkages through and into the site. The allocation and development of the site can:

- Provide up to 106 high quality, energy efficient family homes in an accessible location, each with access to electric charging points;
- Provide up to 42 affordable homes (40%);
- Create a definitive and defensible urban edge to Whiteley, whilst retaining the rural character of Curdrige;
- Achieve a biodiversity net gain in excess of the 10% required by policy;
- Deliver new woodland planting extending and reinforcing the Shawfords Lake corridor, supporting a strengthened and enhanced settlement gap between Curdrige and North Whiteley;
- Provide a local door-step play area;

	<ul style="list-style-type: none"> <li>• Secure a landscape-led design, including the retention of existing and new landscape planting;</li> <li>• Deliver new habitat creation.</li> </ul> <p>Overall, land at Fairthorne Grange can deliver a clear and long-term defensible edge to North Whiteley, providing a transition between the urban and rural area and retaining a physical and visual settlement gap between North Whiteley and Curdrige. The site is considered available and suitable for residential development. It meets the definition of deliverable, and would contribute to the provision of homes in the district in a logical and sustainable manner.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Reflecting South Hampshire Urban Areas position within the settlement hierarchy, and the over-reliance of the spatial strategy on existing allocations that were planned many years ago and have been slow to deliver, the policy wording should be amended to make clear that reference to 5,650 homes is a minimum. Further, and in any event, the target should also be increased significantly, in response to the additional site allocations necessary to comply with NPPF 11 d) and the DtC.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Under Part iii), the following text amendments should be made: ‘The South Hampshire Urban Areas will make provision for a minimum of 5,650 (to be updated according to a revised allocation of additional sites/provision) new homes and contribute towards meeting the Partnership for South Hampshire strategy of improving economic performance, primarily by providing major housing, economic growth and community and physical infrastructure in two sustainable new neighbourhoods at Newlands (West of Waterlooville) and North Whiteley (Whiteley). Strategic Policy SP2 Spatial Strategy and Development Principles.</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>	<p>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>No</p>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	O'Flynn Group
<b>Personal reference number</b>	ANON-AQTS-32TE-Q
<b>Full reference number</b>	ANON-AQTS-32TE-Q/2/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>O'Flynn Group objects to Strategic Policy SP2 (Spatial Strategy and Development Principles). SP2 outlines the development strategy by which the vision and objectives of the plan will be achieved to ensure that the Council supports the delivery of new housing, economic growth and diversification across the three identified spatial areas of Winchester Town, South Hampshire Urban Areas and the Market Towns and Rural Areas. Parts (i), (ii) and (iii) identify the quantum of homes that each of the respective areas are allocated to provide across the plan period, a total confirmed later on in the Local Plan to be 15,465 homes. Of this, c 5,650 new homes are to be provided in the South Hampshire Urban Areas, which the Local Plan indicates will “contribute towards meeting the Partnership for South Hampshire strategy of improving economic performance, primarily by providing major housing, economic growth and community and physical infrastructure”</p> <p>O'Flynn Group considers that whilst these are positive overarching statements, the Local Plan itself (and its policies) does not reflect this commitment towards delivering positive, sustainable growth. Firstly, as Para 26 of the NPPF identifies, Plans should be positively prepared providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and be informed by agreements with other authorities so that unmet needs can be accommodated. The accompanying Integrated Impact Assessment Report (2024) (“the IIA”) confirms at Page 590 that as a result of the Reg 18 consultation, the Council has considered further the unmet needs allowance within the Local Plan, and has increased this from 1,450 dwellings to c 1,900 dwellings within this current Reg 19 plan. However, whilst this is an increase from that proposed at Reg 18 stage, the most recent Spatial Position Statement (December 2023) prepared by the Partnership for South Hampshire (PfSH) declares the full extent of the unmet need is 11,771 dwellings and therefore even an increased figure of 1,900 is still significantly short of addressing the full unmet need. As such, it is incumbent upon Winchester to plan positively to help meet this unmet need of neighbouring authorities as much as possible. However, the IIA which considers the development options for the District, has not considered any development options which would provide a significantly increased level of housing to help address the full extent of the unmet need across the PfSH area. It is therefore unclear how it can be considered that</p>

Winchester has planned positively to deliver the greatest amount of housing possible to meet the wider unmet need, as the options for doing so have not been tested from either a feasibility or sustainability perspective. As intimated by part (ii) of the policy, provision of housing in the South Hampshire urban areas is assumed by the Local Plan to contribute to meeting the needs of the PfSH. It should be noted that the quantum of housing being located in this area is significant, such that it exceeds the full requirement of Winchester's pro-rata local housing need within the southern part of the District, which as identified by the PfSH Statement of Common Ground 2023, notes a requirement for the southern PfSH area of Winchester as 3,055. Additionally, the provision of housing within this area covers the entirety of the 1,900 homes to fulfil Winchester's proposed contribution to unmet housing need, allowing for an additional c 600 homes. It can therefore be inferred that this is meeting some of the needs associated with the centre and north of the district and demonstrates an acceptance that needs from the north can be met in the south (and tacitly vice versa). This is plainly obvious given the modest scale of Winchester's district and its strong north-south transport links. Further, the Local Plan does not provide a breakdown between housing identified to meet its own local need and that of the wider unmet need, instead taking the view that any of the housing identified can either be used to meet the local housing need or wider unmet needs. As such, there is no evident reason why allocations cannot be identified in the north of the District to meet the wider unmet need of the PfSH. Part (vi) places emphasis on the need to make use of public transport, and the integration of the development of homes, services and facilities to reduce car use. The IIA considers the potential for a new settlement option at Micheldever Station which would build upon the strong rail links in the north of the district which would firstly build upon the extant public transport links and encourage a shift away from car use as well as secondly align more with the Council's other ambition to move towards carbon neutrality. However, this option is dismissed by the IIA.

O'Flynn Group considers that, as drafted, Policy SP2 is unsound, and the approach of the Local Plan's spatial strategy cannot be justified. Paragraph 17 of the NPPF makes clear that development plans: "must include strategic policies to address each local planning authority's priorities for the development and use of land in its area", Paragraph 11b of the NPPF also requires plans to contain strategic policies which "should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas". Plans should also be prepared positively and with the objective of contributing to the achievement of sustainable development (Paras 16a and 16b). In this context, the Council should have considered other reasonable spatial development options to increase the quantum of housing that Winchester District delivers to provide greater assistance to the wider PfSH region in addressing the unmet need position. A large strategic allocation such as a new town centre on strong public transport link, providing local services and facilities would undoubtedly be a sustainable strategy for growth and the opportunity for this approach to address unmet need was prematurely rejected in a previous Regulation 18 stage of the Local Plan process and has not been appropriately re-assessed in light of the latest position.



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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Persimmon (South Coast)
<b>Personal reference number</b>	BHLF-AQTS-32Q9-8
<b>Full reference number</b>	BHLF-AQTS-32Q9-8/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>See report for full details.</p> <p>Whilst we welcome the fact that the Council is seeking to meet its housing needs, and some of the unmet needs from neighbouring authorities through this Local Plan, we have serious concerns around the approach taken. First, we do not consider sufficient work has been done to determine whether WCC can accommodate more unmet need from surrounding authorities, especially from the authorities within the PfSH area which has well documented shortfalls. Further, given the increase in housing numbers stemming from the forthcoming standard method changes, we consider WCC could and is able to have gone further in terms of including other suitable and available sites within its spatial strategy. We have concerns over the delivery, as anticipated, of housing from the three strategic sites. Strategic sites can stall due to both macro and micro issues and whilst they are all now delivering units we consider some caution needs to be applied to the trajectory as proposed. We consider additional growth can, and should be, directed to some of the larger rural settlements, particular Denmead. there are sites available and suitable for development which can exceed the target set out in the Local Plan and would enable the village to maintain its role and grow proportionality over the Local Plan period.</p> <p>Additional consideration between the relationship between the Local Plan, and Denmead Neighbourhood Plan is required to ensure both remain effective. It is unclear why the settlement boundary is not proposed to be changed for Denmead when this will need to happen to facilitate growth. This remains unjustified and does not provide an effective spatial strategy.</p> <p>Finally, we consider there is no justification for the phased approach to the delivery of greenfield sites, which could see these held back until April 2030. There is a significant need for housing in Winchester and the wider South Hampshire area, and the Council should be taking a proactive stance to achieve this.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>See report for full details.</p> <p>We consider that the Council has not considered all reasonable alternatives in its spatial strategy, and should be considering further sustainable sites, especially in the rural areas to the south of the District, within the PfSH sub-region.</p>

	The Site north of Anmore Road, Denmead, would make a valuable contribution to the supply of housing adjacent to a sustainable settlement. It would contribute to the PfSH housing market need which is has a significant unmet housing need.
<b>What is your suggested wording or text for the policy?</b>	See report for full details. The Site 'Land to the north of Anmore Road, Denmead' is suitable and available and therefore should be allocated for development within the Local Plan. This would enable WCC to meet further unmet need stemming from the South Hampshire area.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (Copy of form - refers to letter)</a> <a href="#">Supporting document 1 (Commenting on policies and proposed site)</a> <a href="#">Supporting document 2 (Vision document - Land North of Anmore Road, Denmead)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Peter Nicholas Homes
<b>Personal reference number</b>	ANON-AQTS-329C-T
<b>Full reference number</b>	ANON-AQTS-329C-T/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The spatial strategy of the Plan is set out in Policy SP 2 with the spatial housing distribution addressed in Policy H3. 2.2 Policy SP2 identifies 3 spatial areas and the development principles for each. Clarification is sought from the Council as to which figure it should be but for the purposes of this Statement the figure of 3825 will be used. Policy SP H3 identifies that 1,570 new homes will be provided by the Larger Rural Settlements that fall within the MTRA. One of the Larger Rural Settlements is Denmead, a large village, close to Waterlooville with its extensive range of facilities and services. In the Settlement Hierarchy Background Paper it ranks 5th of the 49 settlements in Winchester District in terms of the facilities and services it provides. Denmead seems to be a logical sustainable place to accommodate significant future growth and this is recognised in the Settlement Hierarchy Background Paper. Given the sustainable nature of Denmead it would be expected that it would accommodate meaningful growth levels in the emerging plan.</p> <p>Disappointingly, the Council has limited its ambitions in relation to the Denmead which is only accommodating 330 new dwellings or 8% of the MTRA housing provision. Furthermore, Paragraphs 14.83 and 14.84 indicate that the Council is largely relying on completions, commitments and an existing allocation, to accommodate future growth in Denmead up until 2040, rather than delivering new sites. In terms of allocating new future sites in Denmead, the Council has given the Parish a housing target of 100 new homes to accommodate through the Neighbourhood Plan process. Although Denmead is considered a sustainable location for accommodating growth it has been limited by Policies H2 and DEN1 to 100 new dwellings in the plan period. It is not clear why Denmead's potential future growth has been so constrained, especially when there are sustainable sites on the edge of the village that could be brought forward in the plan period without compromising openness and closing the gap between Denmead and Waterlooville. The current approach reads as a lack of commitment to deliver future sustainable growth. The settlement is capable of accommodating additional new housing development post 2024 in a sensitive and sustainable way. The Council should reassess the ability of Denmead to accommodate higher levels of housing growth, particularly in light of the need to accommodate acute future housing need. Overall, the spatial approach in relation to Denmead is overly cautious and is not considered to be justified or positively prepared.</p>

Policy SP H1 sets out a housing target of 15,115 for the district. The Council's use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas, is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention to revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years. The Government has helpfully published tables showing what the Council's new housing need figures and there will be a need to review the plan before submission would apply to Winchester. Sources of housing supply 4.1 Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized sites forward. As noted in Section 2 it is considered that the Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Denmead. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans. There are medium and strategic sized sites available in Denmead that could be brought in a sensitive manner to help not only with housing delivery, but also to re-inforce the vitality of the settlement and further the creation of quality places. These sites include Furzeley Golf Course /Denmead Driving Range and Furzehill Farm. Both sites fall within the settlement gap between Denmead and Waterlooville identified in the adopted local plan and re-inforced in Policy NE7 of the emerging local plan. Paragraph 7.60 acknowledges that across the district there are a number of areas of generally undeveloped and open land which help to define and retain the separate identity of settlements. It is submitted that there are areas in the current settlement gap that do not contribute to openness and its undeveloped character and should not be included in the gap. Both the Furzeley Golf Course /Denmead Driving Range and Furzehill Farm sites and their contribution to the gap are considered in more detail below.

**Furzeley Golf Course/Denmead Driving Range.** Furzeley Golf Course/Denmead Driving Range (known as Furzeley Village) is a 34ha site in Denmead with potential capacity to accommodate a mixed use scheme involving at least 351 homes, extensive green infrastructure and other uses potentially including employment and community facilities. The site contains areas of development and parts that could not be considered open. In this context, it could be said to be not fulfilling the function required of it by Policy NE7. The non inclusion of the site as a strategic allocation in the emerging plan and the reliance on a Neighbourhood Plan process that has been limited in scope to 100 units is considered both a flaw and unjustified. In order to make the Plan sound the following modifications should be made to the emerging Plan policies:

- The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process
- Furzeley Village site be included as a strategic mixed use allocation for Denmead
- Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030
- The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA

	DEN 22 & 23 lying to the south and south west of Denmead Furzehill Farm. Further details are supplied in the representation about the reasons why the site should be allocated for 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="#">Supporting document 1 (Commenting on policies and policies map)</a> <a href="#">Supporting document 2 (Vision document - Furzeley Village, Denmead)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Peter Walker
<b>Personal reference number</b>	ANON-AQTS-3BAW-6
<b>Full reference number</b>	ANON-AQTS-3BAW-6/3/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	The whole policy has ignored the wishes of a large part of the population of Winchester whose Petition, which has been handed to both Winchester City Council and to Hampshire County Council, needs to be taken into account in the preparation of the Local Plan. The Petition has some 3200 signatories.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We call on Winchester City Council To RE-OPEN (or Keep Open) Andover Road to traffic as a requirement for the approval of the Sir John Moore Barracks or any other re-development in North Winchester.
<b>What is your suggested wording or text for the policy?</b>	Approval of the Sir John Moore Barracks redevelopment requires the agreement of all parties concerned to RE-OPEN (or Keep Open) Andover Road to traffic before any dwellings constructed on the redevelopment site are occupied.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Raymond LUCKIE
<b>Personal reference number</b>	ANON-AQTS-3BCJ-U
<b>Full reference number</b>	ANON-AQTS-3BCJ-U/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	What a load of rubbish is being talked about. 1) suggest all the previous questions are spurious & to long winded, trying to put people off giving answers.2) perhaps all councils involved should have spoken to STAGECOACH before suggesting integrated public transport. Some buses have changed routes, times or DISCONTINUED altogether, leaving communities/villages no option but to use cars.
<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>	As for appearing at hearings as this will be a complete waste of my time as people in charge are not worried about general public feelings.
<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	ReAssure Limited c/o Legal & General Real Assets
<b>Personal reference number</b>	ANON-AQTS-3BPH-6
<b>Full reference number</b>	ANON-AQTS-3BPH-6/5/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>As set out in the representations to the Regulation 18 Consultation, our client supports the general approach to the delivery of, and support for, economic growth within the spatial strategy. However, whilst the strategy for Winchester Town under Policy SP2(i) refers to the growth of the economy in number of sectors, such as higher education, creative and media industries, and other knowledge-based activities, it does not refer to those traditional employment uses (within Class B and E(g)) which remain of importance to the economic growth of Winchester. These uses continue to provide an important contribution to the economy and further growth of such uses should be explicitly supported.</p> <p>In relation to the Regulation 18 Consultation, we recommended that Policy SP2(i) set out explicit support for traditional employment uses within Class E(g)(ii) and (iii), B2 and B8 in order to address the above point. The Council's Consultation Comments document in relation to this Policy sets out that the first and third paragraphs of Policy SP2 adequately address this point. However, we disagree as there is no such general support for traditional employment uses in this part of the Policy. Indeed, it specifically only refers to higher education, creative and media industries, and other knowledge-based activities. If the intention of Policy SP2(i) is to support traditional employment uses in Winchester Town, as it appears from the Consultation Comments document, then it should be explicitly referred to in the Policy.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>As set out in the representations to the Regulation 18 Consultation, our client supports the general approach to the delivery of, and support for, economic growth within the spatial strategy. However, whilst the strategy for Winchester Town under Policy SP2(i) refers to the growth of the economy in number of sectors, such as higher education, creative and media industries, and other knowledge-based activities, it does not refer to those traditional employment uses (within Class B and E(g)) which remain of importance to the economic growth of Winchester. These uses continue to provide an important contribution to the economy and further growth of such uses should be explicitly supported.</p> <p>In relation to the Regulation 18 Consultation, we recommended that Policy SP2(i) set out explicit support for traditional employment uses within Class E(g)(ii) and (iii), B2 and B8 in order to address the above point.</p>

	<p>The Council's Consultation Comments document in relation to this Policy sets out that the first and third paragraphs of Policy SP2 adequately address this point. However, we disagree as there is no such general support for traditional employment uses in this part of the Policy. Indeed, it specifically only refers to higher education, creative and media industries, and other knowledge-based activities. If the intention of Policy SP2(i) is to support traditional employment uses in Winchester Town, as it appears from the Consultation Comments document, then it should be explicitly referred to in the Policy.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As set out in the representations to the Regulation 18 Consultation, our client supports the general approach to the delivery of, and support for, economic growth within the spatial strategy. However, whilst the strategy for Winchester Town under Policy SP2(i) refers to the growth of the economy in number of sectors, such as higher education, creative and media industries, and other knowledge-based activities, it does not refer to those traditional employment uses (within Class B and E(g)) which remain of importance to the economic growth of Winchester. These uses continue to provide an important contribution to the economy and further growth of such uses should be explicitly supported.</p> <p>In relation to the Regulation 18 Consultation, we recommended that Policy SP2(i) set out explicit support for traditional employment uses within Class E(g)(ii) and (iii), B2 and B8 in order to address the above point. The Council's Consultation Comments document in relation to this Policy sets out that the first and third paragraphs of Policy SP2 adequately address this point. However, we disagree as there is no such general support for traditional employment uses in this part of the Policy. Indeed, it specifically only refers to higher education, creative and media industries, and other knowledge-based activities. If the intention of Policy SP2(i) is to support traditional employment uses in Winchester Town, as it appears from the Consultation Comments document, then it should be explicitly referred to in the Policy.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes  <a href="#">Letter (Commenting on policies)</a></p>

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Richard Doughty
<b>Personal reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council
<b>Full reference number</b>	ANON-AQTS-32FT-R - New Alresford Town Council/6/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We applaud the expectations set by SP2 in delivering development proposals, in particular iv) "Conserve and enhance the importance of environmental assets". Agree with the need for restriction of development in the countryside, except where absolutely necessary in line with SP3 and the fundamental principle that any such development "should not cause unacceptable harm to biodiversity and the water environment, to the character and landscape of the area".
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP2
<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/59/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Local plan meets the NPPF soundness requirements.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	SP2
<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/21/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	SP2 Spatial Strategy & Development Principles Southern Water supports criteria 'x' of this policy in ensuring sufficient infrastructure capacity for new development, noting this will apply to water supply and wastewater infrastructure.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	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>	SP2
<b>Name of respondent (or client)</b>	Shorewood Homes
<b>Personal reference number</b>	ANON-AQTS-32UQ-4
<b>Full reference number</b>	ANON-AQTS-32UQ-4/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The growth focus in Winchester Town is supported, especially in light of the new Government’s ambition to deliver 1.5 million new homes across the country in the next five years and Winchester’s historic role as an important sub-regional centre. However, it is considered that the Plan is not ambitious enough in relation to the level of housing growth to be accommodated in Winchester Town on small to medium sites. 3. Housing need and target 3.1 Policy SP H1 sets out a housing target of 15,115 for the district. The Council’s use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years. 3.3 On 30 July 2024 the Government published a Written Ministerial Statement and draft Standard Method and NPPF. These documents indicate a clear direction of travel in terms of national planning policy in relation to meeting housing needs. The Government has helpfully published tables showing what the councils new housing need figures would be if the proposed Standard Methodology were used. In Winchester’s case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, a difference of 423 and almost two thirds more than the existing. Applying this new Standard Method figure to the current plan period would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan. Winchester’s housing requirement is still likely to significantly increase. There is a need to review the plan before submission would apply to Winchester. It is submitted that the Council should take account of the Government’s new direction of travel and take time to carefully consider whether it should progress to submission, or instead return to an early stage of plan-making to revise its plan in accordance with the new NPPF before re-submitting. In this context, the Council will need to keep an open mind regarding the supply of sites that it can draw upon to meet potentially higher housing numbers. This is addressed in the following section. Sources of housing supply Winchester Town Windfall 4.1 Para 70 of the current NPPF (Dec 2023) recognises that small and medium sized sites can make an important contribution to meeting the housing requirements of an area.</p>



	<p>Authorities are asked to support the development of windfall sites through their policies and decisions, especially within existing settlements. Para 72 expects there to be compelling evidence that they will be a reliable source of supply and realistic in nature. Strategic Policy H1 indicates that housing development will be distributed between 3 spatial areas, one of which is Winchester Town. The town is expected to accommodate about 5,640 dwellings in the plan period. Table H2 of the Plan identifies a number of housing supply sources for the town to meet this target. One of the largest recognised sources is windfall, providing 1,035 dwellings or 18% of the supply. The inclusion of this substantial windfall allowance has been justified through the 2021 evidence base document - Assessment of Windfall Trends and Potential. 4.3 Paragraph 3.3 of the Assessment identifies that an average of 88 dwellings per annum over the 2012 – 2019 period came from windfall sites, making up over half the total of the Winchester Town completions. If the 88 dpa windfall figure was multiplied over the plan period this would give a total windfall supply of 1,760. This is a much lower figure than the 1035 dwellings that identified in Para 12.4 amounting to over 700 less. On this basis the Council have taken a very conservative approach to windfalls and the amount of supply expected to come forward over the plan period from Winchester Town windfalls. This level of cautious approach is not considered justified.</p> <p>Shorewood Homes support the inclusion of a high windfall allowance for Winchester Town. The detailed justification for the allowance is welcomed and it is considered that compelling evidence for their inclusion in Winchester Town's supply is considered to exist. However, it is suggested that the Council has been overly cautious in its assumptions about the amount of supply that may come forward from windfall as the historic figures have shown a far higher annual contribution from this source. In terms of soundness and justification, Strategic Policies SP2, H1 and H3 should be strengthened by increasing the level of windfall allowance for the Town. 4.5 Residential redevelopment is identified as significant component of the Winchester windfall supply and Shorewood's 3ha proposed residential redevelopment site at Pitt Manor, Romsey Road, Winchester for 48 net new homes is evidence that this form of development will continue to be a reliable source of supply for the Town. The Pitt Manor site is considered to be a suitable and deliverable site capable of bringing forward a high quality development in a highly sustainable location. A recent pre-application meeting confirmed that the principle of the site was acceptable. The Pitt Manor site supports the Council's and Government's strategy to bring forward urban small/medium sites on a quick basis, enabling timely delivery to meet acute needs. It also responds to the Council's objectives regarding climate change mitigation and reducing carbon footprints. On this basis, it is considered to be a suitable site for contributing towards Winchester Town's future windfall supply.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	St Philips Strategic Land
<b>Personal reference number</b>	ANON-AQTS-329U-C
<b>Full reference number</b>	ANON-AQTS-329U-C/3/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response [REFER ALSO TO SEPARATE EMAILED VERSION OF REPRESENTATIONS]</b></p> <p>Policy SP2 (Spatial Strategy and Development Principles) is heavily interlinked with Strategic Policy H1 (Housing Provision). The following section of these representations responds to the total quantum of housing specified in the Consultation Plan. Overall, it is considered that Policies SP2 and H1 of the Consultation Plan do not positively plan for the significant affordability pressures within Winchester District, nor effectively plan to accommodate the needs for neighbouring authorities in the South Hampshire Urban Area, and are accordingly unsound.</p> <p>Policy H1 is derived using the Government’s Standard Methodology to establish the District’s local housing need, and includes an uplift to accommodate a small proportion of the housing need from neighbouring authorities in the PfSH area (addressed in further detail, below). It should be recognised that the proposed changes to the Framework resulted in a significant uplift in housing need from 676 dwellings per annum (dpa) to 1,099 dpa. This would result in the Council needing to commence an immediate Local Plan review. The latest median housing affordability ratio for the district is at 13.19 and is in the top 5% of the least affordable districts to live in (outside London and the Isles of Scilly). Despite the significant affordability issues, the HTP recommends that the Standard Method figure should not be increased to provide additional affordable housing, citing Government policy and market viability conditions as a limit to the amount of affordable housing that can be delivered. Firstly, whilst the standard methodology approach does include an affordability adjustment, the PPG is clear that the affordability adjustment applied in the standard methodology formula is not a solution to problems of affordability. Secondly, the Council’s Authority Monitoring Reports demonstrate that the Council has been unsuccessful in meeting their 40% affordable housing target as specified in Policy CP2 of the current Local Plan. Affordable Housing Completions [FOR TABLE, REFER TO EMAILED VERSION OF SUBMISSION]. Therefore, it is unjustifiable for the Council to continue to solely rely on the application of standard affordable housing policies to address housing prices and the unaffordability of housing during the next Plan period. Overall, whilst the standard methodology will start to address issues of affordability, it will not properly address the long-standing affordability issues in the district.</p>

The Council's proposed strategy to address matters of affordability is not positively prepared and fails to take into account reasonable alternatives in providing for a greater level of housing in the District. Policies SP2 and H1 should be amended accordingly. Duty to Cooperate with Partnership for South Hampshire Area (PfSH). The HTP states that the Council is able and willing to accommodate some unmet needs from neighbouring areas, so far as possible, within the parameters of the Council's proposed development strategy. However, the unmet needs of the PfSH area are substantially higher, due to the significant constraints resulting from the South Downs National Park to the north, New Forest National Park to the west, and the Solent to the south. The latest calculation of housing need within the PfSH area is set out within the December 2023, Spatial Position Statement between the PfSH authorities (dated December 2023). The table below, reproduced from the December report, outlines the housing provision, per authority within the PfSH area. [FOR TABLE - SEE EMAILED VERSION OF SUBMISSION]. It is clear that there is a substantial housing shortfall within the partnership area, amounting to nearly 12,000 dwellings over the period 2022-2036 resulting from the publication of the 2023 position statement, Statements of Common Ground (SoCG) were published between the PfSH authorities. Winchester and Test Valley should be planning to accommodate a significant uplift in their respective housing strategies to accommodate PfSH unmet need. We note that the provision made in the Consultation Plan for unmet needs from the PfSH area has been increased from that in the Regulation 18 Plan (an increase of approximately 450 dwellings). However, it is unclear how this increased 1,900 dwelling figure has been reached, and whether it could and should be higher.

The HTP sets out that the Council has tested and consulted upon four development strategy options and that Option 1 (distributing development to a sustainable hierarchy of settlements based on the existing Local Plan) scored well. However, how this strategy has translated into the level of development proposed for each settlement in the hierarchy / consistent with this strategy is not apparent. The SHELAA demonstrates that there are a significant number of additional developable and deliverable sites (as confirmed by the Council itself) in the district which have not been taken forward for development. In Otterbourne, for example, a sustainable settlement towards the southern edge of the district and in very close proximity to the PfSH area, could deliver 297 dwellings based on paragraph 6.39 of the Development Strategy and Site Selection Topic Paper. Whilst we accept that this level of development may not be considered to be sustainable in this location, it is wholly unclear how the wider 'adverse impacts when assessed against policies in the Framework' have resulted in the limitation of development in Otterbourne to just 55 dwellings.

In the Interim Statement of Common Ground between Winchester City Council and Havant Borough Council (August 2024). Havant Borough Council is mindful that the NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for. Whilst Havant Borough Council will undertake a full review of the Winchester City Council Proposed Submission Local Plan (Regulation 19) as part of the 6 week public consultation, it reserves the right to raise concerns regarding the soundness and legal compliance of the plan through the consultation and

examination. Overall, the provision of 1,900 dwellings towards the unmet needs of neighbouring authorities is unjustified. In this regard, the Consultation Plan has not been positively prepared and cannot be considered to fulfil the Duty to Cooperate. It is questioned as to the appropriateness of the Consultation Plan period commencing in 2020 and thus the inclusion of completions since 2020 as part of the housing supply for the Plan period. The Council has been clear in the HTP that they have purposely started the Plan period at 2020 to enable the 'over supply' of these years to be captured. However, the intent of the Standard Method for calculating housing need is to look forward whilst capturing and accounting for past housing delivery. The PPG is clear that the current year is used as the starting point for calculating housing need and that the affordability ratio for the current year should be applied. The affordability ratio is adjusted annually to reflect house prices and market signals, which are influenced by past housing completions delivered to the market – completions (and any theoretical 'over supply') have, therefore, already been accounted for in the affordability adjustment. As such, the start date of the Consultation Plan should be that of the standard method calculation, the current year, with the previous completions prior to this, not counting towards supply in the Consultation Plan, rather supply against the existing Local Plan provisions. This particular point has been recently raised by Inspectors in the examinations of both the West Berkshire and North Norfolk Local Plans, with the Inspector in the latter examination, in a post-hearing statement, concluding that the base date of that Plan should reflect that of the date from which the housing need was calculated, April 2024 in that case. A copy of the Inspector's post-hearing note is provided at Appendix 3 to these representations – [SEE EMAILED VERSION OF SUBMISSION].

For Winchester, on the Council's current figures (which we do not accept), this would result in a standard method housing need over the period to 2040 of some 10,816 dwellings plus a further 1,900 provision towards unmet needs – a total of 12,716 dwellings. The housing provision in Table H2 would amount to 12,295 dwellings (not including completions 2020-2023), and thus there would be a shortfall even on the Council's case relevant to the housing requirement. Additionally, should the Consultation Plan not be adopted until 2026, which is not unrealistic given the remaining process to be followed up to adoption, then the Plan period would be required to be extended to 2041 in order that the required minimum 15 year from period from adoption is covered. This would necessitate an additional year of housing land supply being identified. Policy H3, and by implication Policies SP2 and H1, cannot therefore be considered to accord with national policy and should be amended accordingly, with the identification of additional housing provision being necessary. It is clear from the above that the Consultation Plan:

- Does not accord with national planning policy, with the start of the Plan period not being the 'current year', the basis for calculation of housing need and, as a result, fails to address the full housing needs of the district.
- Relies on the Standard Method for identifying local housing need as a maximum target rather than the minimum starting point position, as set out in national policy.

	<ul style="list-style-type: none"> <li>• Fails to provide an additional affordability uplift beyond the Standard Method in order to address the significant and worsening affordability of housing within Winchester district.</li> <li>• Inadequately provides for unmet housing needs in the wider PfSH area and, therefore, the fails in its Duty to Cooperate.</li> </ul> <p>It is therefore considered that the Consultation Plan fails to meet the test of soundness set out in the NPPF.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#"><u>Letter (commenting on policies and evidence base - includes vision document)</u></a></p>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Star Energy Group plc
<b>Personal reference number</b>	BHLF-AQTS-32YG-X
<b>Full reference number</b>	BHLF-AQTS-32YG-X/3/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Strategic Policies SP1, SP2 and SP3 make no reference to mineral development. There are no policies which set out the Council's response to minerals development within the proposed planning area. Furthermore, the proposed policies map does not include the adopted Mineral Safeguarding Areas and Mineral Consultation Areas. National Planning Practice Guidance is clear that Winchester City Council has an important role to play in safeguarding mineral resources and development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations 6 are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA.</p> <p>The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses. The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are</p>

	<p>more energy intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA. The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses.</p> <p>The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are more energy intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i></p>	<p>Yes  <a href="#">Form (Commenting on policies and policies map)</a>  <a href="#">Letter (Commenting on policies and policies map)</a></p>



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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Steven Favell
<b>Personal reference number</b>	ANON-AQTS-323A-J
<b>Full reference number</b>	ANON-AQTS-323A-J/4/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	SP2 7 The statement seems to lack common sense. High attractors of people, retail, leisure, should be prioritised to Town Centres first? Winchester Town centre cannot cope with traffic demand now. Why try to create more traffic flow by making people travel into an overcrowded town centre? Out of town retail parks that can cope with traffic from remote areas are required to prevent the 'weekly shop' and other requirements drawing more people in a town centre.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Is the survey here to invite comment or to discuss purely whether the submission is legal? Being legal does not make it right.
<b>What is your suggested wording or text for the policy?</b>	Retail and leisure that results in high demand should be placed at the outskirts of towns, with sufficient parking, to avoid unnecessary traffic demands in town centres.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Stuart Crossen
<b>Personal reference number</b>	BHLF-AQTS-328V-C
<b>Full reference number</b>	BHLF-AQTS-328V-C/4/SP2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Spatial Strategy &amp; Strategic Policy SP2</p> <p>Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development”. Policy SP2 proposes that Winchester Town will provide for about 5,640 new homes, the South Hampshire Urban Areas to provide about 5,650 new homes and the Market Towns and Rural Area to make provision for 3,850 new homes. The plan proposes to deliver just 757 new homes per annum which represents a reduction of 249 new homes per annum that is currently being delivered and a reduction by 342 new homes per annum than will likely be required in the new standard method. One of the aims of the WDLP is to “provide ‘Homes for All’ and the Government has also made it very clear that it wants to boost the supply of new homes, to about 300,000 homes per annum nationally.” However, the WDLP is on course to reduce its contribution to providing homes for all and Winchester will more likely instead contribute to a deficit of this target.</p> <p>We also object not to the three spatial areas, but to the housing distribution set out. Firstly, the housing figures should be expressed as a minimum, rather than an ‘about’. This is to reflect the NPPF and ensure that the overall housing delivery in the plan period meets the need identified, whilst recognising the national policy imperative to boost significantly the supply of housing and not apply a ceiling or cap. Secondly, insofar as the distribution between the three spatial areas, we consider that an over reliance is placed upon both the South Hampshire Urban Area and Market Towns and rural area at the expense of Winchester Town which is the most sustainable settlement. There are significant environmental constraints to these spatial areas, for the South Hampshire Urban Area the quantum of housing envisaged requires the delivery of two new neighbourhoods which will not realise the benefits of new development upon existing communities (for example in relation to infrastructure improvements serving existing residents), whilst the extent of housing to be put to the Market Towns and rural areas risks underpinning a key policy objective to maintain rural character and individual settlement identity.</p>

	<p>In contrast, Winchester Town has been the focus of significant growth in previous plans, which has been successfully delivered across the plan period and demonstrates a proven, deliverable option for the emerging plan. In the current plan, Winchester Town accommodated a far greater proportion of housing relative to the other spatial areas than is the case in this draft plan. There are suitable, achievable and deliverable site options to allocate at Winchester Town, one such example being Lanham Lane (site reference WIN18). We object therefore to the terms of paragraph 9.27 of the plan which refers to Winchester Town being “heavily constrained”. Paragraph 13 of the NPPF states “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a></p>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Sue Wood
<b>Personal reference number</b>	ANON-AQTS-3B4C-5
<b>Full reference number</b>	ANON-AQTS-3B4C-5/5/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	no comment
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	no comment
<b>What is your suggested wording or text for the policy?</b>	no comment
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Teresa Baraclough
<b>Personal reference number</b>	ANON-AQTS-32ZT-C
<b>Full reference number</b>	ANON-AQTS-32ZT-C/1/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Sustainable transport considerations cannot have been fully addressed in this document as funding for the 61 bus has only recently been withdrawn. Any new building on this route between Eastleigh and Winchester will be impacted by reduced public transport and increased private car traffic as residents are forced to find other ways to get to their places of work or education and also to the hospital.
<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>	SP2
<b>Name of respondent (or client)</b>	The Clay Family
<b>Personal reference number</b>	ANON-AQTS-32MY-4
<b>Full reference number</b>	ANON-AQTS-32MY-4/5/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>As currently drafted, the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities - see also attached representations. - Strategic Policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification. The strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester Town and the South Hampshire Urban Areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, Market Towns and Rural Area, is identified to make provision for 3,850 new homes. Colden Common is identified as a Larger Rural Settlement within the Market Towns and Rural Area. Whilst we are supportive that this area will make provision for some housing, as this spatial area covers a large physical area of the district, we believe that the Council should be more ambitious in its housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PfSH) area.</p> <p>We support the development strategy for Market Towns and the Rural Area which sets out that development will be provided in the most accessible and sustainable locations, to support the vitality and viability of communities. However, it is considered that as currently drafted, the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities. We therefore encourage the Council to make provision for further homes in the Market Towns and the Rural Area by considering allocating further sites in the spatial area.</p> <p>The Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the market towns and rural areas of the district to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect the environment is supported. However, we encourage the Council to review the housing provision for this area and increase it to ensure it is in accordance with the Government's ambitious housing targets over the next five years and beyond. Section 3 of these representations further explores the housing provision for the district over the plan period.</p>



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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Thomas Hutchinson
<b>Personal reference number</b>	ANON-AQTS-329E-V
<b>Full reference number</b>	ANON-AQTS-329E-V/4/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy SP2 is not consistent with national policy; nor is it justified, having regard to the reasonable alternatives and evidence available to the Council. The amount of development proposed for the service centres in the rural areas of the District is not justified anywhere in the Plan. The Sustainability Appraisal does not provide the reasoned justification either, as this is based on broad options with generalised conclusions. Policy SP2 divides the District into three spatial areas with a new homes requirement for each, yet provides no explanation for how much each spatial area is apportioned out of the total requirement for the District. No reference is made to the amount each of the larger settlements in the District should grow in order to meet their local housing needs and support their service base to ensure the ongoing vitality and viability of communities.</p> <p>This conflicts with Paragraph 31 of the NPPF which states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. The spatial strategy should have considered the particular opportunities and constraints of each service centre in the rural parts of the District and use the evidence in the Settlement Hierarchy Background Paper to apportion a number for the Market Towns and Rural Areas part of the District that would enable the service centres to meet their particular social and economic needs. Each settlement in the Market Towns and Rural Areas needs to be able to fulfil its needs relative to its role and function and the strategy requires that most new development to be focused in or near to local service centres so that surrounding villages benefit.</p> <p>The concentration of growth into service centres within the Market Towns and Rural Area of the adopted Local Plan was endorsed by the Inspector examining the Plan. Paragraph 109 of their report states: “a target of about 250 new dwellings each for the other six named settlements would properly reflect past levels of development, recent population projections and public consultations through the Blueprint exercise, amongst other things, including the SHLAA. The revised policy would allow for some minor deviation above and below the target figure, according to relevant local circumstances. It would also provide the opportunity for limited expansion to help meet local needs, including supporting existing facilities and some economic/commercial growth, where appropriate, as well as providing for local families and the increasing</p>

	<p>numbers of elderly people to help retain a balance of population.” It is not clear why this type of analysis is not carried forward into the current Plan and its evidence base. The Settlement Hierarchy Background Paper to inform the Local Plan (August 2024 Update) confirms in paragraph 1.4 that: “The classification of towns, villages and rural settlements is an important tool in planning terms, for the purposes of supporting the implementation of local plan policies. Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because residents would be able to access a greater range of services and facilities more easily, without the need to travel by private car which is the least sustainable form of transport and which adds most carbon emissions, the reduction of which is a key council objective in achieving carbon neutrality by 2030.”</p> <p>In this context, the Council should have looked carefully at the rural areas for where growth can support services of wider benefit and avoid people having to travel into Winchester and other larger centres for services. A rural service centre is able to provide a genuine alternative to travelling into the larger centres and new housing can consolidate their role within the rural areas. The Local Plan should be looking at the evidence and reflecting the character, needs and opportunities of the rural parts of the Borough and take account of the particular circumstances so that planning policies play an active role in guiding development towards sustainable solutions as set out in Paragraph 9 of the NPPF.</p> <p>In considering the future needs of Denmead to 2040, the Local Plan should have had regard to the NPPF policy for rural housing which states in Paragraph 83: “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” Furthermore, Paragraph 74 suggest that significant extensions to villages and towns can often be the best way of achieving the supply of large numbers of new homes, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. This should ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>A number for the Market Towns and Rural Area that is based on a comprehensive analysis of the social and economic needs of each service centre, taking account of any environmental constraints that would prevent these needs being met.</p>

<b>What is your suggested wording or text for the policy?</b>	Further work is needed by the Council to arrive at new wording.
<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	Tony Clements
<b>Personal reference number</b>	ANON-AQTS-3BX4-T
<b>Full reference number</b>	ANON-AQTS-3BX4-T/9/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The spatial strategy and development principles contained in Policy SP2 are the fundamental components of the Local Plan upon which will be founded the success or failure of the Plan. The level of housing provided for by the Local Plan is central to the purpose and effectiveness of the Local Plan. Failure to plan properly to address housing needs locally, and in the wider functional economic area, would undermine a key purpose of the operation of the planning system. There is a context that must inform the future examination of this plan created by the proposed reform of the planning system that should be considered particularly when assessing the efficacy of the proposed spatial strategy.</p> <p>The incoming Government has made very clear how it views this iteration of national policy via the consultation document accompanying the proposed reforms to the National Planning Policy Framework and the Planning System: The last Government’s reforms to planning policy in December 2023 were damaging for housing supply, disrupting plan-making and undermining investor confidence. We are therefore acting swiftly to reverse many of these changes, and implement our manifesto commitments, so that local councils, developers and investors understand exactly how we expect the planning system to function, over this parliament and beyond.. We are keen to engage with all stakeholders to understand the impacts of these reforms. This Local Plan is being advanced with the objective that it will be examined against the requirements of the December 2023 NPPF and therefore will not be obligated to make provision for a district housing requirement derived using the new standard methodology, which will take necessary steps to address chronic housing affordability issues that exist in districts such as Winchester. The 2040 Local Plan is not therefore in-step with changes to the planning system that are taking place nationally and which are central to the Government’s manifesto commitments. It is clear, with reference to the text quoted above, that such a plan is dramatically out of step with the current Government’s thinking and would be irrelevant in terms of its approach to implementing a robust and up to date housing strategy from the outset.</p> <p>The Government has proposed transitional arrangements for local authorities with local plans that are in preparation for those plans that have reached Regulation 19 publication stage but not yet been submitted for</p>

examination one month after the revised framework is published, with a gap of no more than 200 dwellings per annum between the local planning authority's revised LHN figure and its proposed housing requirement (as set out in the Publication version of the plan), should also progress to examination under the version of the NPPF it has used when preparing the plan thus far.

It is important because the housing requirement within the 2040 Plan is (significantly) more than 200 dwellings per annum below that to be set for the district by the revised standard methodology, which would mean (under the terms of paragraph 7 quoted above) that the Plan would need to be revised to bring its strategy into line with the requirements of the new NPPF and to be submitted for examination within a period of 18-months from the effective date, had the Regulation 22 stage not be reached. The requirement to review the plan 'as soon as possible/at the earliest opportunity' is insufficient because such a phrase has no certain meaning. The obligation to review plans that are progressed in the manner that Winchester City Council is proposing should be immediate and unavoidable. Should it be determined that the 2040 plan is able to proceed to adoption it is vital that the immediate review mechanism proposed to be inserted into Policy SP1 is incorporated into the plan. Policies SP2 and H1 are closely interlinked and therefore the response to the provisions contained within each necessarily overlap. While the Council is technically able to advance the plan under the transitional provisions, it is material to consider how it would be required to prepare a plan that would be consistent with the revised NPPF, when examining the soundness of these policies. The revised standard methodology will introduce a much stronger affordability multiplier that will require planning authorities to make provision for higher levels of housing growth designed to tackle the acute issues that prevail in places such as Winchester.

As drafted the spatial strategy is not sufficiently ambitious to deliver against the key objectives the Council has identified as central to the philosophy of the Plan, or to anticipate and plan for the likely development pressures that will arise in the South Hampshire Urban Area that will need to be accommodated in less constrained districts, such as Winchester. Previous submissions made on behalf of Vistry/Taylor Wimpey to the Regulation 18 Draft Plan consultation (December 2022) set out clear arguments why the Council should have chosen a far more ambitious housing target for this plan, using the original standard methodology as a starting point, but going significantly beyond it as a means of addressing the chronic affordability issues that prevail. The Introduction to the Draft Plan acknowledges that it is becoming harder and harder for people of all ages to find a suitable house they can afford and states that the delivery of affordable housing is a key priority of the Local Plan. However, as with other aspects of the Plan the rhetoric is largely empty when the approach is examined.

Vistry/Taylor Wimpey advocated within earlier representations that the Council should incorporate an upward adjustment factor of its own to address the specific problems of affordability that prevail and pursue an allocation strategy founded upon strategic scale allocations, where there is greater potential to impose strict

	<p>affordable housing delivery requirements and where evidence shows there is more certainty that policy compliant levels of delivery will be achieved (unlike small sites/windfalls). The Council's MDA policies have demonstrated that strategic allocations have the greatest propensity to achieve significant affordable housing delivery, and to positively influence placemaking in support of the Council's wider corporate objectives. This plan does not build on this spatial option in a meaningful way. However, with the advent of a higher housing requirement for the district derived from the new standard methodology, and a clear obligation to cooperate purposefully on strategic matters (such as accommodating unmet housing needs) through plan-making, the reforms to the planning system will require Winchester to adopt an ambitious future spatial strategy; active consideration should be given to this now. The 'Homes for All' section of the 2040 Plan considers the distribution of growth proposed and the component of supply that is identified to help meet unmet housing needs arising from the PfSH area. Further comments relating to the spatial strategy and the soundness of the approach are submitted against these policies.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>The spatial strategy should be based on focussing development at Winchester Town.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Letter (commenting on policies)</a> (pdf, 991kb)  <a href="#">Supporting Document (Planning for South Hampshire)</a> (</p>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Union4 Planning Ltd
<b>Personal reference number</b>	ANON-AQTS-32MQ-V
<b>Full reference number</b>	ANON-AQTS-32MQ-V/5/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy SP2 sets out the Strategic Vision for the area and commits to a specific level of housing and economic growth. We feel that the policy should however, also reference the infrastructure needs of the area and make specific reference to the need to invest in healthcare and other social infrastructure to support the needs of the communities.</p> <p>As noted in relation to the vision and objectives, while the LP seeks to promote health by improving air quality, increasing opportunities for walking and cycling and enhancing access to outdoor recreation and the natural environment and by delivering inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure, it does not expressly recognise the need for additional healthcare investment in the vision, objectives of policies of the proposed Plan. At present, SP2 only references the health and well-being of the new residential communities and does not recognise the ongoing and future need for investment in social infrastructure to ensure that this is able to adapt to meet the challenges of the future. It is the case that health needs are changing and that existing services and facilities will need to be enhanced, supplemented and adapt to meet the needs of the community over the life of the Plan. We feel that this is an important omission that should be addressed with a specific policy objective that:</p> <p>‘The council will support the delivery of new housing, economic growth, development and diversification, as appropriate for each of the three spatial areas, through the following development strategy:</p> <p>i. Winchester Town will make provision for about 5,640 new homes through a range of accommodation, including the completion of the Kings Barton development and the redevelopment of Sir John Moore Barracks, to meet the needs of the whole community and to ensure that the local economy and services develop further their existing and growing strengths in higher education, creative and media industries, healthcare and other knowledge-based activities, whilst respecting the town’s special heritage and setting.’</p> <p>Suggested additions above are highlighted in bold.</p> <p>The policy should also include a commitment to:</p>



	<p>‘Enhancing the health and well being of the community by supporting investment in the healthcare and social infrastructure of the area, including within the urban area of Winchester as the principal settlement within the borough.’</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy SP2 sets out the Strategic Vision for the are and commits to a specific level of housing and economic growth. We feel that the policy should however, also reference the infrastructure needs of the area and make specific reference to the need to invest in healthcare and other social infrastructure to support the needs of the communities. As noted in relation to the vision and objectives, while the LP seeks to promote health by improving air quality, increasing opportunities for walking and cycling and enhancing access to outdoor recreation and the natural environment and by delivering inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure, it does not expressly recognise the need for additional healthcare investment in the vision, objectives of policies of the proposed Plan. At present, SP2 only references the health and well-being of the new residential communities and does not recognise the ongoing and future need for investment in social infrastructure to ensure that this is able to adapt to meet the challenges of the future. It is the case that health needs are changing and that existing services and facilities will need to be enhanced, supplemented and adapt to meet the needs of the community over the life of the Plan. We feel that this is an important omission that should be addressed with a specific policy objective that:</p> <p>‘The council will support the delivery of new housing, economic growth, development and diversification, as appropriate for each of the three spatial areas, through the following development strategy:</p> <p>i. Winchester Town will make provision for about 5,640 new homes through a range of accommodation, including the completion of the Kings Barton development and the redevelopment of Sir John Moore Barracks, to meet the needs of the whole community and to ensure that the local economy and services develop further their existing and growing strengths in higher education, creative and media industries, healthcare and other knowledge-based activities, whilst respecting the town’s special heritage and setting.’</p> <p>Suggested additions above are highlighted in bold.  The policy should also include a commitment to: ‘Enhancing the health and well being of the community by supporting investment in the healthcare and social infrastructure of the area, including within the urban area of Winchester as the principal settlement within the borough.’</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>As above:  ‘Enhancing the health and well being of the community by supporting investment in the healthcare and social infrastructure of the area, including within the urban area of Winchester as the principal settlement within the borough.’</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Upham Parish Council
<b>Personal reference number</b>	ANON-AQTS-322X-8 - Upham Parish Council
<b>Full reference number</b>	ANON-AQTS-322X-8 - Upham Parish Council/1/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>In attempting to demonstrate compliance with paras vi and x , proposals will refer to, and expect to be able to rely on, the Strategic Transport Assessment. As noted in the submission from the Southern Parishes, to which we subscribe and which we support, this is an unsound document based on incorrect data and a flawed approach which does not follow the MoHCLG guidance. Despite significant developments which have recently taken place here, the Southern Parishes have been left with a shrinking bus service network. This is destined to be even further reduced with the withdrawal of funding being proposed by HCC cabinet on the 14th October.</p> <p>The sites around Bishops Waltham proposed for the new housing the village is to receive, are all on the periphery of the village. This is inevitable and in the nature of plans, but these new developments will require a strong public transport network to support their residents if they are not to become totally car dependent. the Strategic Transport Assessment, the HCC LTP4 and the HCC's BSIP, all offer fine aspirations for a comprehensive public transport network which if implemented would do much to deliver the zero carbon aspirations at the heart of the plan. LPT4 notes (p25) 'However, we recognise that there are still parts of our transport system that could work better, or differently. Transport and land use planning is not integrated as well as it could be. This is partly because transport decisions are largely the responsibility of the County Council, while planning decisions are made by the districts and the boroughs (the local planning authorities). Over recent decades the location of new housing, employment, and shops has led to increased travel distances for many residents, and has often meant that driving is their only realistic option to get around. A more joined up approach is required to ensure that new development reduces the need to travel and provides people with a choice of high quality travel options.'</p> <p>This clearly identifies the need for strategic thinking and funding to develop a network that suits existing and projected development. The Strategic Transport Assessment, despite its name, does not do this. To illustrate the consequences of this disconnect (in every sense) LPT4 goes on to say (P47) 'A lack of choice of quality public transport provision is contributing to loneliness, social exclusion, and deprivation,</p>

	<p>especially in rural areas. Inaccessible transport (in terms of physical access or ability to access information, tickets, etc.) can be one of the biggest barriers facing people with physical and mental disabilities.'</p> <p>The STA is reliant in turn on the BSIP. As noted in the Southern Parishes joint response, the BSIP fails to take the opportunity to create a network serving the recently developed housing, as well as the established communities, in the Southern Parishes. Instead it concentrates on a small number of existing routes that, on the current business model, are commercially viable or can be made so with restricted amounts of support. Even to meet those limited objectives, the BSIP notes (at 5.7). 'However, to achieve everything set out here requires significant levels of investment, we will only be able meet the aspirations set out here if sufficient funding is made available by Government to the local authority and our partners. In other words, the ability of WCC to deliver the amount of housing that MoHCLG targets require, that meets the Zero carbon aspirations of the local plan, is dependent on funding being forthcoming from DoT. There is no guarantee that this will occur. In the current situation of budget constraints it is not even a likelihood.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>We suggest that there is a solution to squaring this circle and delivering the new housing that Winchester needs whilst meeting the WCC's laudable objectives in combatting the climate crisis. This is to take a much more robust approach in this plan to ensuring that new developments pay their way, not only in terms of providing new services to link to new developments, but also to ensure that the existing network, on which these new developments will depend, remain supported and fully functional. This will enable the plan to be found sound at EiP. We suggest that the Strategic Transport Assessment needs to be re-drafted to reflect the need for development and continuing support for the public transport network, the infrastructure delivery plan needs to incorporate this requirement, and policies such as SP2 need to be more explicit in their requirements for this commitment to funding.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>To be agreed. Too complex to be summarised here!</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>No</p>

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

<b>Policy/Evidence base document</b>	SP2
<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/3/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Vistry Group believes that the overall number of homes to be planned for in Winchester district must be increased, noting in particular the opportunity for an additional housing allocation adjoining North Whiteley as part of an extended Whiteley community which would help meet needs in South Hampshire.</p> <p>The plan should maximise opportunities to meet unmet need through additional site allocations. It should set a higher housing target, which reflects positive opportunities and capacity within the district. It should allocate additional deliverable sites in sustainable locations.</p> <p>Vistry Group presented a Vision document for this that accompanied its representations to the Strategic Issues and Priorities Consultation in April 2021, which illustrates the opportunity at land west of Fairthorne Grange Farm and land at Brindle Farm. The site (Strategic Housing and Economic Land Availability Assessment, reference CU32) is deemed by the council to be deliverable/developable. The Vision document for Vistry presents a concept with the potential to deliver around 430 homes.</p> <p>The justification for the increase in provision is set out in our representations to strategic policies H1, H2 and H3 and relates in particular to the scope for the district to contribute more to address the (growing) unmet needs in the Partnership for South Hampshire (PfSH) area as part of the legal duty to co-operate, but also to provide for greater flexibility in the event of any non-delivery experienced on allocated sites. This is to ensure that the policy is positively prepared and remains effective over its period.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	The overall number of homes to be planned for in Winchester district must be increased.
<b>What is your suggested wording or text for the policy?</b>	Wording not supplied, however the overall number of homes to be planned for in Winchester district must be increased to reflect the concerns expressed in Vistry Group representations, particularly those in respect of the housing policies.
<b>Do you agree with how the 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>	SP2
<b>Name of respondent (or client)</b>	Wates Developments Ltd
<b>Personal reference number</b>	BHLF-AQTS-328X-E
<b>Full reference number</b>	BHLF-AQTS-328X-E/13/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Wates supports the Council's overall spatial strategy and acknowledges that the most sustainable location for new development are likely to be those with the most services and facilities. The spatial strategy also recognises the need to support the more rural parts of the plan area, and the need to strike a balance between the social, economic, and environmental needs of the area.</p> <p>However, and as is set out later in these submissions, the Council must be cognisant of forthcoming changes in national policy and must build in some flexibility to it overall strategy. It is likely that housing needs (and targets) will increase in in the near future, so the Council should include a provision in its early strategic policies for an early plan review. Alternatively, the Council could consider 'reserve' sites, or commit to reviewing the development capacity at specific sites, and locations where more development might reasonably be achieved without additional harm (for example, by allocating Land to the rear of Thody's).</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b>	Yes <a href="#">Form (refers to letter)</a>



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

Letter (commenting on policies and evidence base)

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-3286-C
<b>Full reference number</b>	BHLF-AQTS-3286-C/14/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates supports the Council's overall spatial strategy and acknowledges that the most sustainable location for new development are likely to be those with the most services and facilities. The spatial strategy also recognises the need to support the more rural parts of the plan area, and the need to strike a balance between the social, economic, and environmental needs of the area.</p> <p>However, and as is set out later in these submissions, the Council must be cognisant of forthcoming changes in national policy and must build in some flexibility to its overall strategy. It is likely that housing needs (and targets) will increase in the near future, so the Council should include a provision in its early strategic policies for an early plan review. Alternatively, the Council could consider 'reserve' sites, or commit to reviewing the development capacity at specific sites, and locations where more development might reasonably be achieved without additional harm (for example, increasing the potential development capacity at Land at Brightlands).</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

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

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	Wates Developments Ltd. ('Wates')
<b>Personal reference number</b>	BHLF-AQTS-328G-W
<b>Full reference number</b>	BHLF-AQTS-328G-W/13/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Full response on website  Legally compliant Yes  Positively prepared Yes  Sound Yes  Justified Yes  Compliant with the duty to cooperate Yes  Effective Yes  Compliant with national policy Yes</p> <p>Wates supports the Council's overall spatial strategy and acknowledges that the most sustainable location for new development are likely to be those with the most services and facilities. The spatial strategy also recognises the need to support the more rural parts of the plan area, and the need to strike a balance between the social, economic, and environmental needs of the area.</p> <p>However, and as is set out later in these submissions, the Council should be cognisant of forthcoming changes in national policy and must build in some flexibility to its overall strategy. It is likely that housing needs (and targets) will increase in the near future, so the Council should include a provision in its early strategic policies for an early plan review. Alternatively, the Council could consider 'reserve' sites, or commit to reviewing the development capacity at specific sites, and locations where more development might reasonably be achieved without additional harm (for example, by allocating Land at Pudding Farm).</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	

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

<b>Policy/Evidence base document</b>	SP2
<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/4/SP2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>The ambition to continue to grow development within the South Hampshire Urban Area within policy SP2 is welcomed. The recognition that the area can accommodate additional development is considered an important commitment to contributing towards the objectives of the Partnership for Urban South Hampshire housing delivery and one which allows the West of Waterlooville MDA a further opportunity to contribute to the housing needs of the District through the delivery of high-quality homes in a sustainable location, meeting a range of needs and aspirations, such as sustainable travel and affordable housing.</p> <p>The approach to meeting unmet needs is supported in principle but it is considered that it does not go far enough in meeting the need identified for South Hampshire. As set out by the HBF in their representations to WCC, the Statement of Common Ground with Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages of the Local Plan regarding unmet needs from neighbouring authorities and this should be taken into account in establishing the amount of housing to be planned for. This statement suggests that the Council's approach to the duty to cooperate has not followed the requirements of the Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and further review is required.</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 (Site Delivery Statement - Berewood)</a>

<b>Policy/Evidence base document</b>	SP2
<b>Name of respondent (or client)</b>	YMCA Fairthorne Manor Group   Philipa Spicer
<b>Personal reference number</b>	BHLF-AQTS-328Y-F
<b>Full reference number</b>	BHLF-AQTS-328Y-F/8/SP2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>We broadly support this approach; but we do consider that there is a greater opportunity to allow all three areas to play a greater part in driving much needed growth in the PfSH area. As cited above, paragraph 3.1 confirms that the Local Plan approach to identify three broad geographical areas is the “same way” as before, and in our opinion, particularly with paragraph 1.2 confirming that the area “has an above average carbon footprint” this demonstrates that simply repeating the approach is perpetuating problems of poorer sustainability and poorer affordability as compared to other LPAs in the PfSH area. Furthermore, we note a constant tension between what ‘Winchester’s City Centre’ actually is, versus what the Council appear to want it to be. For example, the Local Plan is rightly proud of Winchester’s status as a Cathedral City, and it also rightly proud of its heritage and historic environment stemming from its former role as the Capital of England, and yet, the strategy that underpins the District’s Settlement Hierarchy refers to “Winchester Town”. This tension is also expressed at paragraph 12.1 which states “The area referred to by the city council as Winchester Town consists of the Winchester Wards plus the adjoining built up areas of Badger Farm, Oliver’s Battery and Harestock, as defined on the Policies Map” (underlining is our emphasis).</p> <p>The “Local Plan Vision” set out on page 19 states, for example, “The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character” (underlining is our emphasis). In our opinion, this demonstrates a policy position of preservation and not growth.</p> <p>We consider that the City of Winchester and its surrounding settlements have a much greater role to play in the region than the Local Plan suggests, and we explore this topic further in these Representations. See additional PDF.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	



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

**WCC Response:**

Comments noted.

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

**WCC Recommended Changes arising from the representations:**

No changes to the policy apart from:

Consequential changes to Local Plan Table 2 (page 216) to reflect the approach agreed in the updated Statements of Common Ground with Portsmouth City Council and Havant Borough Council are included in the [Proposed Modifications](#); and

[A Housing Topic Paper Update](#) has been produced to address some key issues arising from the representations, particularly the proposed changes to the NPPF, the Plan period, the derivation of the unmet housing need figure, updated housing land supply information, and details of the housing trajectory and 5-year land supply (to be published following submission of the Local Plan).

Local Plan Reference or document	Policy SP3 Development in the Countryside	
<b>Total Number of Representations received</b>	24	
<b>Number of respondents who confirmed they consider the policy is –</b>	<b>Yes</b>	<b>No</b>
<b>Legally Compliant</b>	15	4
<b>Sound</b>	10	13
<b>Complies with Duty to Cooperate</b>	13	4
<p><b>Summary of Representations</b></p> <p>A significant portion of the comments (61% of the responses) focus on sustainable development and environmental considerations, welcoming efforts to protect biodiversity but raising issues about the restrictive nature of developments outside settlement boundaries, which could hamper growth around urban centres like Winchester City. In terms of protecting local assets and countryside, 57% expressed concerns that overly restrictive policies may limit sustainable development opportunities near these boundaries. 52% of respondents sought more flexibility to achieve growth without compromising rural character. The need for an adaptable housing supply policy, voiced by 39% of respondents, suggests revising settlement boundaries to include suitably situated land, such as brownfield sites, to ensure enough housing provision. Lastly, 9% of responses touch on infrastructure provision and economic growth, advocating policy amendments to facilitate necessary utilities and recognize mineral safeguarding areas.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p>ANON-AQTS-3BAW-6/1/SP3</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/4/SP3</b></p> <p>ANON-AQTS-3BSY-T/9/SP3</p> <p>ANON-AQTS-3B4C-5/1/SP3</p> <p>ANON-AQTS-3B5A-4/1/SP3</p> <p><b>ANON-AQTS-32CD-5 - Colden Common Parish Council/6/SP3</b></p> <p><b>ANON-AQTS-32UK-X - Environment Agency/3/SP3</b></p> <p>ANON-AQTS-32NT-Z/1/SP3</p> <p>ANON-AQTS-32NR-X/2/SP3</p> <p>ANON-AQTS-32G7-V/1/SP3</p> <p><b>ANON-AQTS-327U-A - Southern Water/7/SP3</b></p> <p><b>ANON-AQTS-32SB-K - Defence Infrastructure Organisation/1/SP3</b></p> <p>ANON-AQTS-32F8-V/1/SP3</p> <p>ANON-AQTS-32TW-9/1/SP3</p> <p>ANON-AQTS-322T-4/1/SP3</p> <p>BHLF-AQTS-326E-S/1/SP3</p>		

BHLF-AQTS-3267-B/1/SP3

BHLF-AQTS-32YG-X/1/SP3

**BHLF-AQTS-3282-8 - Natural England/2/SP3**

BHLF-AQTS-328S-9/1/SP3

BHLF-AQTS-328P-6/2/SP3

BHLF-AQTS-328K-1/2/SP3

BHLF-AQTS-32QQ-Z/1/SP3

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

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<b>Policy/Evidence base document</b>	SP3
<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/3/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	There should be a minor addition to the policy ("not increase flood risk") as shown below: "...unacceptable harm to biodiversity and the water environment, not increase flood risk..." It is important to highlight the importance of flood risk management for any development to accord with fundamental principles within the National Planning Policy Framework (paragraph 165).
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There should be a minor addition to the policy ("not increase flood risk") as shown below: "...unacceptable harm to biodiversity and the water environment, not increase flood risk..." It is important to highlight the importance of flood risk management for any development to accord with fundamental principles within the National Planning Policy Framework (paragraph 165).
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP3
<b>Name of respondent (or client)</b>	Bargate Homes
<b>Personal reference number</b>	ANON-AQTS-32G7-V
<b>Full reference number</b>	ANON-AQTS-32G7-V/1/SP3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Whilst Bargate Homes recognise the importance of the countryside, and its role within the district, the draft wording of Policy SP3 is considered overly restrictive in its application. Notably, the policy states that ‘in the countryside, defined as land outside the settlement boundaries, the Local Planning Authority’ will only permit certain forms of development. This includes expansion or suitable replacement of existing buildings, tourist accommodation and countryside related uses.</p> <p>The NPPG emphasises the need for plan makers to be proactive in identifying as wide a range of sites as possible, as well as broad locations for development. NPPF paragraph 20 requires Local Plans to identify an appropriate and sustainable strategy for the pattern and scale of development, including housing. National planning policy stipulates that new development should be distributed to reduce travel and encourage more sustainable modes of travel.</p> <p>Defining development in the countryside simply as land outside of settlement boundaries is considered to restrict the ability for sustainable development opportunities adjacent to existing settlements coming forward. As outlined in the Development Strategy and Site Selection document (July 2024), ‘Winchester is the highest rated settlement hierarchy review as it contains a large number of facilities and services, including ‘higher order’ facilities. No other settlements in the District approach Winchester in terms of the range of facilities and services they provide, so Winchester is at the top of the settlement hierarchy and is the most sustainable development location in the district.’ In this context therefore, the wording of Policy SP3 as currently drafted does not acknowledge or reflect the growth potential of Winchester City specifically, nor its relative position within the settlement hierarchy. According to the overly restrictive stance contained in this policy, sustainable development opportunities adjacent to the settlement boundary of Winchester City are afforded the same policy status, as sites adjacent to small rural villages. This does not represent a sound basis upon which to take forward the local plan, and equally constrains the flexibility and responsiveness of the new local plan. Land at Salters Lane is considered to be well situated to accommodate the growth requirements of Winchester City, as well as encouraging sustainable modes of travel. As illustrated in the accompanying vision document, the site at Salters Lane aligns with the development to the north and south that currently</p>

	sits outside the settlement boundary. Similarly, the site is located outside of the perceived 'gap' between Winchester and Littleton and will not compromise this separation. Consequently, the site's location is considered a natural area for development, notwithstanding the position of the settlement boundary. Policy SP3 therefore needs to be worded with a flexible approach based on site specific circumstances in accordance with national policy, so as not to constrain sustainable development opportunities coming forward which are well situated to the district's urban centres, and identified locations for strategic growth, such as Winchester City.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	There needs to be acknowledgement of site specific circumstances which would support development outside of the defined settlement boundary, particularly adjacent to Winchester City. It is suggested that the phrase 'defined as land outside the settlement boundaries' is deleted. In addition, a further type of development should be added to the list contained in the policy which takes account of sustainable locations and site specific circumstances. Suggested wording as follows: viii) Residential development in sustainable edge of settlement locations, in particular Winchester City.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP3
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/1/SP3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>This policy is considered to be:</p> <ul style="list-style-type: none"> <li>• Not legally compliant</li> <li>• Not sound</li> </ul> <p>The policy clearly limits development outside of settlement boundaries to allocated sites, development associated with agriculture, re-use or expansion of existing buildings, tourist accommodation, infilling and residential accommodation for which an exceptional need has been demonstrated. This approach prohibits potential development in locations directly adjacent to settlement boundaries that could benefit from local services and facilities as well as existing public transport services to enable sustainable development. Adding flexibility to this policy would assist WDC in continuing to maintain its housing land supply over the course of the plan period, particularly when considering the significantly increased housing requirements based on the proposed standard method and, to ensure choice and competition in the market for land, inclusive of a 5% buffer as per para 75 NPPF (para 76 NPPF 2024 respectively). There is a risk that, should this policy remain as proposed, in the event of WDC not being able to maintain its five-year housing land supply based on increased housing requirements, applications that are considered to be sustainable could be refused locally with increased prospective of being allowed at appeal, with avoidable resources and costs for WDC.</p> <p>The policy should therefore be amended, proposed (shown in red) as follows:      “In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:</p> <ol style="list-style-type: none"> <li>i. Development in accordance with Site Allocations as set out in this Plan or any made Neighbourhood Plans; or</li> <li>ii. Exceptionally further development beyond allocated sites will only be permitted where the council’s monitoring of housing delivery across the District cannot be maintained at the anticipated rate. Proposals must be accompanied by evidence demonstrating how the site can be delivered in a timely manner and fulfil the following criteria:</li> </ol>

	<p>a. Be located within or adjacent to the existing settlement boundary as defined in the local plan or a made neighbourhood plan</p> <p>b. Not lead to coalescence with any neighbouring settlement</p> <p>c. Be of a scale and in a location in keeping with the existing form of the settlement and not adversely affect its character and appearance</p> <p>d. Respect and retain natural boundaries</p> <p>e. Not have any adverse environmental impacts, including landscape, historic environment, biodiversity, open space, watercourses and green infrastructure</p> <p>f. Provide appropriate and sufficient infrastructure such as waste water drainage and highways</p> <p>iii. (...)</p> <p>For clarity, the site on land east of Lovedon Lane is a development opportunity adjacent to the settlement boundary at Kings Worthy, with access to the services and facilities within the town. Details are provided within the Representation to Regulation 18 including Vision Document (see Appendix B). see additional info PDF</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a></p>

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Blue Cedar Homes Ltd
<b>Personal reference number</b>	ANON-AQTS-322T-4
<b>Full reference number</b>	ANON-AQTS-322T-4/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy sets out the general principles which will apply to development in the countryside – which is defined as areas outside settlement boundaries. Settlement boundaries, in principle, are objected to. Such boundaries set out arbitrary boundaries, which have the effect of preventing the development of new homes in otherwise sustainable locations simply because the development site is located on the ‘wrong’ side of a line. We recognise, however that settlement boundaries in the Local Plan have effectively been brought forwards from previous Local Plans and that their use seems to be an established part of the planning framework in Winchester. There appear, however, to be examples of locations where settlement boundaries seem to exclude sites which are otherwise surrounded on two or more sides by development. Such a situation occurs in the west of the settlement of Littleton around South Drive.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We would suggest that the approach set out in Policy SP3 is inflexible and will prevent otherwise appropriate sites from coming forwards and delivering new homes needed in Winchester. This policy could be improved if the ability to bring forward infill and rounding off sites which are adjacent to settlement boundaries were to be included at settlements with settlement boundaries – as is allowed by Policy SP3 in relation to settlements without settlement boundaries.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No

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

<b>Policy/Evidence base document</b>	SP3
<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/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy SP3 should be supported in full - development in the countryside should only be permitted "by exception" and subject to strict and enforceable conditions to prevent development "by creep" ie. when permission is initially sought for equestrian buildings or similar which are subsequently not used followed by an either unauthorised commercial use and/or retrospective applications for that use which are not challenged.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Debbie Harding
<b>Personal reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council
<b>Full reference number</b>	ANON-AQTS-32CD-5 - Colden Common Parish Council/6/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The Parish Council fully supports this policy.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	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>	SP3
<b>Name of respondent (or client)</b>	Defence Infrastructure Organisation
<b>Personal reference number</b>	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
<b>Full reference number</b>	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	We note the approach in Policy SP3 to direct development within settlement boundaries and that land not within a settlement boundary is defined as countryside. Whilst we welcome the Reg 19 changes regarding the reference to this policy not being relevant to Reg 19 site allocations, such as at SJMB (Policy W2), the continued designation of the SJMB site as countryside appears unnecessary and illogical if Policy SP3 is irrelevant to the Policy W2 SJMB site allocation. We request that the SJMB site allocation is excluded from its current countryside designation in the Reg 19 policy map.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	We request that the SJMB site allocation is excluded from its current countryside designation in the Reg 19 policy map.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or 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>	SP3
<b>Name of respondent (or client)</b>	Ed Flood (Agent on behalf of Sparsholt College)
<b>Personal reference number</b>	ANON-AQTS-32NR-X
<b>Full reference number</b>	ANON-AQTS-32NR-X/2/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Policy SP3 accords with the latest iteration of the NPPF (December 2023) which recognises the intrinsic character and beauty of the countryside but acknowledges the importance of re-using existing buildings and previously developed land to accommodate certain forms of development and uses. The policy is necessarily restrictive but provides sufficient flexibility for established businesses and for proposals where there is a demonstrable operational need (such as Sparsholt College). It is considered that the requirement for proposals to demonstrate an “operational need” for a countryside location is sufficient to enable such proposals to be considered on their merits.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	none
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

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

<b>Policy/Evidence base document</b>	SP3
<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/2/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Natural England welcomes the inclusion of biodiversity and the water environment in this policy. It is still our view that this policy should be strengthened to address the importance of soils, particularly protection of those sites identified as Best Most Versatile in line with the NPPF (Paragraphs 180 and 181).
<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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Heritage Property Southern Limited
<b>Personal reference number</b>	BHLF-AQTS-326E-S
<b>Full reference number</b>	BHLF-AQTS-326E-S/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>The National Planning Policy Framework (NPPF) (December 2023) states (paragraph 89):  “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”  This requires that the use of previously developed land, such as the Portsdown Main site, should be encouraged.</p> <p>Proposed policy SP3, in restricting development to those types defined within sub-paragraphs (i) to (vii), seeks to preclude the redevelopment of previously developed land, which the NPPF states should be encouraged. As currently worded the policy is unsound.  The policy could be made sound with the insertion of the following additional sub-paragraph:  (viii) The use of previously developed land - see supporting information for further detail</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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Judith Anne Polak
<b>Personal reference number</b>	ANON-AQTS-32TW-9
<b>Full reference number</b>	ANON-AQTS-32TW-9/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	Developments outside current settlement boundaries should be avoided at all costs. The boundaries should not be changes as a result of exception sites as this leads to unregulated infilling changing the rural nature of the area. Our rural communities deserve greater protection than provided for in policy SP3.
<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>	SP3
<b>Name of respondent (or client)</b>	Kim Raybone
<b>Personal reference number</b>	ANON-AQTS-32F8-V
<b>Full reference number</b>	ANON-AQTS-32F8-V/1/SP3
<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 is a general misunderstanding about 'countryside' and the view that this is 'natural' and 'green' and 'wild', and that brownfield sites are always ecologically dead. It is far more nuanced than this, and often the reverse can be true.</p> <p>Winchester City Council should lobby for planning regulations to include agricultural land, which constitutes 70% of the land in the UK, comprising mostly pastureland and crops to feed to livestock which only provide 32% of our calories. Pastureland has meant the conversion of woodland/wetlands and any other natural ecosystem into a single species of grass to provide an inefficient and destructive means of providing food, offering very minimal public good. Plans for building on W5, bushfield camp, are very misplaced when there is so much barren pastureland in the area which could benefit from being rewilded or having affordable housing which provide gardens/ponds/trees/hedgerows which farmed land for sheep and cattle cannot provide. I encourage officers and Councillors to read the Governments Food Strategy 2021 to learn more about land use in the UK.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Lisa Fielding
<b>Personal reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
<b>Full reference number</b>	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/4/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The policy seeks to restrict development to that which has a need to be located in the countryside. It is a key policy for managing development proposals outside of defined settlement boundaries. The Parish Council considers that the countryside is one of the district's most important assets and any development should be fully justified. The Parish Council supports the policy. Support Policy SP3
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Lorna Selby
<b>Personal reference number</b>	BHLF-AQTS-32QQ-Z
<b>Full reference number</b>	BHLF-AQTS-32QQ-Z/1/SP3
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>We welcome Strategic Policy SP3: Development in the Countryside for its commitment that development proposed will “not cause unacceptable harm to biodiversity and the water environment”. Employing this holistic approach is valuable to both nature and local communities, to provide access to nature and open spaces, while supporting nature’s recovery and working toward the achievement of legal Environment Act targets. To strengthen this commitment, we recommend that this policy is amended to align with the Local Nature Recovery Strategy. The LNRS should be used to identify where better access to nature is needed, so that development proposals can target the creation of greenspace accordingly. The strategy should also be used in identifying priority areas that mitigation funding should be directed towards. This will help ensure compliance with the Environment Act 2021 and contribute to the achievement of the legal target to protect 30% of land and sea for nature by 2030.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	<p>Yes</p> <p><a href="#">Form (refers to letter)</a></p> <p><a href="#">Letter (commenting on policies)</a></p>

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Messrs Jenssen & Collins
<b>Personal reference number</b>	BHLF-AQTS-328P-6
<b>Full reference number</b>	BHLF-AQTS-328P-6/2/SP3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Settlement Boundary review - Otterbourne</p> <p>Otterbourne is a sustainable settlement with a range of facilities and services. Reg19 paragraph 14.152 acknowledges that there is capacity for the development of about 75 dwellings in Otterbourne, which could be achieved through the delivery of approximately 55 new homes through new site allocations and approximately 20 new windfall dwellings.</p> <p>There are no suitable sites within the settlement boundary of Otterbourne. Hence, provision will need to be made for the release of land beyond the settlement boundary to deliver new homes.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>Amend settlement boundary.</p> <p>Small-scale development opportunities that are physically, functionally and visually related to existing urban areas, could be released through a review of the settlement boundary.</p> <p>The 2014 Settlement Boundary Review (which formed part of the evidence base for the current Adopted Local Plan Part 2) defined a settlement boundary as “the limits of towns and villages, being the dividing line between built-up/urban areas (the settlement) and the non-urban or rural areas (the countryside) to define where policies apply”. The 2014 Settlement Boundary Review added “where there are any obvious and suitable candidates, boundaries could be adjusted to accommodate them and provide a degree of flexibility within the housing supply”. Settlement boundaries should have a degree of permanence to avoid constant change over time. SHELAA ref.OT05 is enclosed by residential development adjoining the northern, western and southern boundaries, and along the eastern boundary by protected woodland which visually and physically separate the site from open countryside. The woodland creates a logical and defensible boundary to the site and establish a logical and natural edge to the urban fabric.</p>
<b>What is your suggested wording or text for the policy?</b>	Amend settlement boundary to include SHELAA ref.OT05
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	

<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form 1 (OT01 and H2)</a> <a href="#">Form 2 (H4)</a> <a href="#">Form 3 (Settlement Boundary review - Otterbourne)</a> <a href="#">Form 4 (SP2)</a>



<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Nia Powys
<b>Personal reference number</b>	ANON-AQTS-3B5A-4
<b>Full reference number</b>	ANON-AQTS-3B5A-4/1/SP3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Whilst BSP recognise the importance of the countryside, and its role within the district, the draft wording of Policy SP3 is considered overly restrictive in its application. Notably, the policy states that ‘in the countryside, defined as land outside the settlement boundaries, the Local Planning Authority’ will only permit certain forms of development. This includes expansion or suitable replacement of existing buildings, tourist accommodation and countryside related uses. The NPPG emphasises the need for plan makers to be proactive in identifying as wide a range of sites as possible, as well as broad locations for development. NPPF paragraph 20 requires Local Plans to identify an appropriate and sustainable strategy for the pattern and scale of development, including housing. National planning policy stipulates that new development should be distributed to reduce travel and encourage more sustainable modes of travel.</p> <p>Defining development in the countryside simply as land outside of settlement boundaries is considered to restrict the ability for sustainable development opportunities adjacent to existing settlements coming forward. The Development Strategy and Site Selection document (July 2024) describes North Whiteley as an area where major development has taken place and is continuing, demonstrating its suitability for housing delivery. It further recognises that land at Fairthorne Grange is well placed next to planned development at North Whiteley, presenting a logical extension to the settlement. In this context therefore, the wording of Policy SP3 as currently drafted does not acknowledge or reflect the growth potential of South Hampshire Urban Areas, nor its relative position within the settlement hierarchy. According to the overly restrictive stance contained in this policy, sustainable development opportunities adjacent to the settlement boundary of places such as North Whiteley are afforded the same policy status, as sites adjacent to small rural villages. This does not represent a sound basis upon which to take forward the local plan, and equally constrains the flexibility and responsiveness of the new local plan.</p> <p>Land at Fairthorne Lane is well positioned to meet the growth needs of North Whiteley. As shown in the vision document prepared by tor&amp;co, the site complements nearby developments. It is conveniently located within a 15-minute walk of essential facilities and services, including bus and rail connections, maximizing the benefits of local investment. The site sits adjacent to the new Whiteley cycleway that will connect Botley station to</p>

	<p>Whiteley village. Whiteley Town Centre is located within a 15 min (3km) cycle ride from the site, along a network of new segregated cycle routes. The site is in the ideal position to benefit from this sustainable active travel corridor. The site is free from constraints, ready for short-term development, and requires no major infrastructure. It offers a natural boundary to Whiteley, creating a buffer between urban and rural areas while preserving a physical and visual gap between Whiteley and Curdrige. Additionally, the site will support diverse habitats and greenery, aiming for more than a 10% increase in biodiversity. The development will feature a variety of energy-efficient, high-quality homes, thoughtfully integrated into the landscape.</p> <p>Particularly in the context of the unmet need, which is not currently provided for by the plan, Policy SP3 needs to be worded with a flexible approach in accordance with national policy, so as not to constrain sustainable development opportunities coming forward which are well situated relative to the district's urban centres, and identified locations for strategic growth, such as North Whiteley.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>There needs to be acknowledgement of site specific circumstances which would support development outside of the defined settlement boundary, particularly adjacent to North Whiteley and the major development that is ongoing within that area.</p> <p>It is suggested that the phrase 'defined as land outside the settlement boundaries' is deleted. In addition, a further type of development should be added to the list contained in the policy which takes account of sustainable locations and site specific circumstances. Suggested wording as follows: viii) Residential development in sustainable edge of settlement locations.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>No</p>

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Peter Walker
<b>Personal reference number</b>	ANON-AQTS-3BAW-6
<b>Full reference number</b>	ANON-AQTS-3BAW-6/1/SP3
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Countryside needs protection
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Restrict building
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP3
<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/9/SP3
<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 has considered the development of the countryside and has limited this to what is strictly necessary. It is very important to minimise the development of the countryside.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	SP3
<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/7/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Southern Water understands the desire to protect the countryside. However, we are concerned that the current wording of the above policy could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development. Policy SP3 seeks to prevent development outside of settlement boundaries unless it has an operational need for a countryside location, such as for agriculture, horticulture, forestry or outdoor recreation. It is important to recognise that there may be limited options available for the location of new water or wastewater infrastructure due to the need to connect into the existing networks. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'</p> <p>We therefore propose the following change to the wording of criteria 'ii' of this policy to ensure that the planning and development of essential utility infrastructure (such as water supply and wastewater infrastructure) is not inadvertently precluded: In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:</p> <p>ii. Development which has an operational need for a countryside location, such as for agriculture, horticulture, forestry, essential infrastructure, or outdoor recreation; The above is what we recommended in the consultation for the Reg 18 but the wording on essential infrastructure has not been included in the latest draft of the plan.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>We propose the following change to the wording of criteria 'ii' of this policy to ensure that the planning and development of essential utility infrastructure (such as water supply and wastewater infrastructure) is not inadvertently precluded:</p> <p>In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:</p> <p>ii. Development which has an operational need for a countryside location, such as for agriculture, horticulture, forestry, essential infrastructure, or outdoor recreation;</p>

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Star Energy Group plc
<b>Personal reference number</b>	BHLF-AQTS-32YG-X
<b>Full reference number</b>	BHLF-AQTS-32YG-X/1/SP3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Strategic Policies SP1, SP2 and SP3 make no reference to mineral development. There are no policies which set out the Council's response to minerals development within the proposed planning area. Furthermore, the proposed policies map does not include the adopted Mineral Safeguarding Areas and Mineral Consultation Areas. National Planning Practice Guidance is clear that Winchester City Council has an important role to play in safeguarding mineral resources and development.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations 6 are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA.</p> <p>The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses. The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are</p>



	<p>more energy intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>The new Policies Map should therefore show Hampshire Mineral Safeguarded Areas and the corresponding Mineral Consultation Areas. These policy designations are crucial to ensure that mineral sites are protected from non-mineral development that could prejudice their operation. National Planning Practice Guidance and both the adopted and emerging Hampshire Minerals and Waste Local Plan state that the MSA and MCA should be reflected on the District Policy Map. The addition of MSA/MCA to the Winchester Local Plan Policy Map will contribute to fulfilling the role that District planning policy should play in minerals planning. The clear identification of these areas across the Development Plan will also help applicants to understand minerals planning and aid the preparation of their planning applications. This has clear benefits for the LPA, MPA, applicants and mineral operators and enhances the clarity and efficiency of the planning process.</p> <p>To supplement this, it is considered that a Mineral Safeguarding Area policy should be included which confirms that consideration will be given to the Minerals and Waste Local Plan in determining planning applications for non-minerals development in MSA, and also that Hampshire County Council will be consulted on all applications within an MCA.</p> <p>The new Local Plan should also incorporate the Agent of Change principle which is established at Paragraph 193 of the NPPF. At present, the draft Local Plan does not include sufficient protection for existing businesses. The draft Local Plan focusses on carbon mitigation and energy efficiency by including a range of green policies. Whilst it is essential that the UK mitigates and adapts to climate change, the new Local Plan must deliver a balance between mitigating carbon emissions whilst also not unduly stifling economic development, including mineral development. The NPPF prioritises economic growth, and this should also be a key theme of the new Local Plan. In addition, it must be recognised that certain forms of development are more energy intensive than others and whilst it is possible to mitigate carbon emissions, it is inevitable that certain development will emit more carbon emissions than they could possibly offset.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i></p>	<p>Yes  <a href="#">Form (Commenting on policies and policies map)</a>  <a href="#">Letter (Commenting on policies and policies map)</a></p>

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

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Sue Wood
<b>Personal reference number</b>	ANON-AQTS-3B4C-5
<b>Full reference number</b>	ANON-AQTS-3B4C-5/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	no comment
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	no comment
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP3
<b>Name of respondent (or client)</b>	The Hospital of St Cross & Almshouse of Noble Poverty
<b>Personal reference number</b>	BHLF-AQTS-328S-9
<b>Full reference number</b>	BHLF-AQTS-328S-9/1/SP3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Settlement boundary (Winchester Town)</p> <p>The NPPF#70 acknowledges that smaller sites “can make an important contribution to meeting the housing requirement of an area, and are often built up relatively quickly”. Mindful of the ‘brownfield first’ approach championed by the Local Plan, small-scale development opportunities that are below the threshold size for allocation; which would provide infill and rounding off opportunities; that are physically, functionally and visually related to the existing urban areas; should be released through a review of the settlement boundary. This echoes the 2014 Settlement Boundary Review (which formed part of the evidence base for the current Adopted Local Plan Part 2) which added “where there are any obvious and suitable candidates, boundaries could be adjusted to accommodate them and provide a degree of flexibility within the housing supply”. SHELAA site ref. WIN10 is a brownfield site (on the Council’s brownfield register) which adjoins the settlement boundary for Winchester; the highest tier settlement in the hierarchy (see Review of Settlement Hierarchy 2024 and acknowledged as a sustainable location for growth.</p> <p>WIN10 extends to approximately 0.26ha and comprises an office building, a store building, private car parking, other associated hardstanding and landscaping. There are 2no. existing vehicular accesses onto St Cross Road and a separate pedestrian access. WIN10 is located in a highly sustainable location being walkable to a range of local facilities and services (including primary school – 4 minute walk, convenience store – 8 minute walk, and central bus station – 20 minute walk), as well as close to public transport links. Settlement boundaries should have a degree of permanence to avoid constant change over time. Part of the WIN10 site includes a group of trees which visually and physically separate the site from undeveloped land to the south. There are additional off-site trees along this boundary. When travelling south along St Cross Road, after WIN10 there is an abrupt end to the urban fabric and a clear transition to a more undeveloped landscape. The tree group and boundary walls create a logical and defensible boundary to the site and establish a logical and semi-natural edge to the urban fabric. The perimeter walls of the Church and Almshouse of St Cross also provide a permanent boundary.</p>

	<p>The 2014 Review advised that small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area will be included. Further, it advises that curtilages that are contained, are visually part of the urban area and are separated from the open countryside will also be included. The land at WIN10 continues to meet these criteria and presents an opportunity to make “efficient use of land and buildings” and to “prioritise the use of previously developed land/buildings in accessible locations”. Importantly, Appendix 3.6 of the latest Authorities Monitoring Report (AMR) 2022-2023 relies on both WIN10 (&amp;WIN11) to deliver homes during the next 5 year period (5YHLS). This suggests that the Council recognises that an adjustment of the settlement boundary to include these sites is entirely logical, and indeed necessary to support land supply.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Amend settlement boundary for Winchester Town to include WIN10 (&amp;WIN11).</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>No, I don't want to take part in a hearing session</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes  <a href="#">Form 1 (D6)</a>  <a href="#">Form 2 (Commenting on settlement boundary - Winchester Town)</a></p>

<b>Policy/Evidence base document</b>	SP3
<b>Name of respondent (or client)</b>	Thomas Hutchinson
<b>Personal reference number</b>	ANON-AQTS-329E-V
<b>Full reference number</b>	ANON-AQTS-329E-V/1/SP3
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the 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>	SP3
<b>Name of respondent (or client)</b>	Winchester College
<b>Personal reference number</b>	BHLF-AQTS-328K-1
<b>Full reference number</b>	BHLF-AQTS-328K-1/2/SP3
<b>Legally compliant?</b>	
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Pervious representation made by Winchester College – Regulation 18 consultation Winchester College request that a change to the settlement policy boundary is made to include Blackbridge Yard, College Walk, Winchester within the settlement of boundary of Winchester Town.</p> <p>Officer Comments in relation to the Regulation 18 consultation ‘Blackbridge Yard lies adjacent to the settlement boundary. It is not an area identified for development and it is not considered necessary or justified to amend the boundary at this location.’</p> <p>Regulation 19 consultation comment – Winchester College  Blackbridge Yard (see Appendix 1 - separate submitted document) has been used by Winchester College for storage purposes for many years. The site includes areas of made ground and is located immediately adjacent to College Walk. Winchester City Council do not explain why it is not ‘necessary or justified’ to extend the settlement boundary to include Blackbridge Yard. Including this brownfield site within the settlement boundary would be consistent with the National Planning Policy Framework (NPPF), which promotes the effective use of land, including supporting the development of under-utilised land while safeguarding and improving the environment.</p> <p>It is therefore justified to include this modest brownfield site within the settlement boundary as it would, subject to obtaining relevant permission, be able to deliver sustainable development and improve the character and appearance of the site which is in the Conservation Area.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	To make the policy sound, Blackbridge Yard, a modest brownfield site, should be included within the settlement boundary as it would, subject to obtaining relevant permission, be able to deliver sustainable development and improve the character and appearance of the site which is in the Conservation Area.
<b>What is your suggested wording or text for the policy?</b>	To make the policy sound, Blackbridge Yard, should be included within the settlement boundary.

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



**WCC Response:**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

Post Regulation 19 to Local Plan policy SP3 (page 27) is included in the [Proposed Modifications](#) to clarify the position regarding potential flood risk and the best and most versatile agricultural land, as well as recognise the need for essential infrastructure to sometimes be located in the countryside.