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

## High Quality Well-Designed Places and Living Well

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 <u>Regulation 22 Statement of Consultation Part 2</u> (<u>November 2024</u>) and SD16 <u>Regulation 20 representations (November 2024</u>). 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			Policy D1
or document		High Quality, Well Desigr	ed and Inclusive Places
Total Number of Representations received		24	
Number of respondents who confirmed they co	nsider the policy is –	Yes	No
Legally Compliant		13	4
Sound		11	8
Complies with Duty to Cooperate		16	1

#### **Summary of Representations**

Support for the wider context of this policy and the importance of planning for an ageing population; ensuring places are accessible and there is access to services and facilities. Although some respondents request that the policy refers to 'inclusive' and 'communities' in terms of place making and creating well designed places.

A number of respondents represent the utility industry and they highlight the importance of involving diverse stakeholders, in development processes, particularly around pre-existing infrastructure. Similarly respondents refer to the need for integration of green infrastructure into design processes to improve outcomes for environmental benefits and local character.

Policy lacks reference to the evidence base and the provision for sport and active recreation as a feature of high quality, well-designed places. Sport England considers that there is synergy with their Active Design guidance and request references is made to this in the proposed policy.

Recognition that good design is essential, there needs to be an emphasis on designing and building good quality homes that minimise damage to the environment and maximise the efficient use of land. There is support for the need to use high-quality durable materials appropriate to context and building design.

Policy should be applied with suitable flexibility in recognition that it may not be possible to achieve all the principles set out in the policy on all sites in all locations. Some terms used in the policy need clarification/definition e.g. attractive as this is open to interpretation.

A number of respondents specifically refer to the matter of design in relation to Winchester Town rather than to the expression of Policy D1.

**Representation Numbers** (Statutory consultees in bold and named)

**ANON-AQTS-32U8-B/Historic England** (this representation does not have a full rep number because it was not directly entered into Citizenspace) ANON-AQTS-3BDP-2/6/D1

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/65/D1

ANON-AQTS-3BSY-T/86/D1

ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/33/D1

#### ANON-AQTS-32CD-5 - Colden Common Parish Council/47/D1

ANON-AQTS-329Q-8/37/D1

ANON-AQTS-32UU-8/8/D1

ANON-AQTS-3BX4-T/13/D1

ANON-AQTS-323A-J/8/D1

# ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/19/D1

ANON-AQTS-32ZS-B/7/D1

ANON-AQTS-3295-C/1/D1

BHLF-AQTS-326P-4/9/D1

BHLF-AQTS-326V-A - National Grid Electricity Transmission/1/D1

BHLF-AQTS-326W-B - National Gas Transmission/1/D1

BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/19/D1

BHLF-AQTS-32YH-Y - Network Rail/6/D1

BHLF-AQTS-328Q-7/16/D1

BHLF-AQTS-328X-E/20/D1

BHLF-AQTS-3286-C/19/D1

BHLF-AQTS-328G-W/18/D1

BHLF-AQTS-328K-1/19/D1

BHLF-AQTS-32QQ-Z/12/D1

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

- Ensure the policy is inclusive;
- Policy needs flexibility to be able to be applied on different sites in different locations; and
- Need to ensure matters such as green infrastructure and the provision of utilities are included in the design process from the outset.

Policy/Evidence base	D1
Policy/Evidence base	וט
document	
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the policy	
legally compliant or sound?	
What is your suggested	
wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.	
However, the links provided may	
contain additional details, such	
as images, tables, or tracked	
changes, if applicable.	

Policy/Evidence base document	D1
Name of respondent (or client)	E Back
Personal reference number	ANON-AQTS-3BDP-2
Full reference number	ANON-AQTS-3BDP-2/6/D1
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Policy D1 is not sound as it has not been positively prepared. It does not take account of the Local Plan evidence base or the local authority's wider policies on "living well". Paragraph 5.36 does not reference provision for sport and active recreation as a feature of high quality, well-designed places.
What modification(s) are necessary to make the policy legally compliant or sound?	Policy D1 – and specifically the table in paragraph 5.36 – should explicitly reflect the importance of sport and active recreation to living well.
What is your suggested wording or text for the policy?	In the table in paragraph 5.36:  - under "Nature" amend the first bullet to read: "Provide a network of high quality, green open spaces with a variety of landscapes and activities, including sport and play" [i.e. add "sport and" before "play"]  - under "Public spaces" amend the third bullet to read: "Make sure public spaces support social interaction and active recreation" [i.e. add "and active recreation"]
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation. However, the links provided	

contain additional detai
as images, tables, or
ed changes, if applicab

Policy/Evidence base	D1
document	
Name of respondent (or	Lisa Fielding
client)	ANON ACTO OBEWA 1391 ( ) B 1 C 3
Personal reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
Full reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/65/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	The policy sets out the approach to design that WCC expects promoters of development to use to inform their proposals for development across the District. The Parish Council supports the policy.  Support Policy D1
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	Rob Edgecock
client)	· · ·
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/86/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Good design is essential. New housing developments need significant improvements over what is currently being done. The emphasis should be on designing and building good quality homes that minimise damage to the environment, maximise the efficiency of land use and do not damage green land of any category.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	NI-
Have you submitted	No
supporting information?  All relevant information related	
to the specific policy or allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	
Hacked Changes, II applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	Morag Kirby
client)	
Personal reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
Full reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/33/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	The ICB acknowledges and supports the 'High Quality, Well-Designed Places and Living Well' chapter, specifically page 61 where it replicates the principles of the NNPF and section 5.8 which states that having access to services and facilities is a requirement of Living Well.  The ICB also supports the wider contexts within this chapter (page 67) which highlights the importance of planning for an ageing population and ensuring that your places are accessible to all and people living in our community have access to the services and facilities they need and opportunities to maintain their health and well-being and reduce social isolation.  The Local Plan continues this approach in the Local Shops, Facilities and Services chapter (page 293) where it stresses the vital role that health centres have in ensuring the vitality and viability of local communities.
What modification(s) are	it out cools and vital voice and vital control in one and guite vitality and vitality of local communities.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	

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

Policy/Evidence base	D1
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/47/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	NI <sub>a</sub>
Have you submitted	No
supporting information?  All relevant information related	
to the specific policy or allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	
trached crianges, it applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire,
client)	RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/37/D1
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Bloor Homes supports in principle the high-quality design principles set out in Policy D1 and has sought to incorporate these in the emerging proposal for its site at Mill Lane, Wickham through a robust analysis of the constraints and opportunities that it presents. However, as previously stated within our representations on the Regulation 18 Plan, it is not necessarily appropriate, or indeed possible for the design process for new development to respond to the 'immediate' and 'wider' area as this could stifle the creation of new characters or create a confused approach to development.  It should also be recognised in the local plan, that in some circumstances it may not be possible to achieve all of the principles identified and this policy should be applied with suitable flexibility to ensure that it is justified.
What modification(s) are necessary to make the policy legally compliant or sound?	Bloor Homes supports in principle the high-quality design principles set out in Policy D1 and has sought to incorporate these in the emerging proposal for its site at Mill Lane, Wickham through a robust analysis of the constraints and opportunities that it presents. However, as previously stated within our representations on the Regulation 18 Plan, it is not necessarily appropriate, or indeed possible for the design process for new development to respond to the 'immediate' and 'wider' area as this could stifle the creation of new characters or create a confused approach to development.  It should also be recognised in the local plan, that in some circumstances it may not be possible to achieve all of the principles identified and this policy should be applied with suitable flexibility to ensure that it is justified.
What is your suggested wording or text for the policy?	Bloor Homes supports in principle the high-quality design principles set out in Policy D1 and has sought to incorporate these in the emerging proposal for its site at Mill Lane, Wickham through a robust analysis of the constraints and opportunities that it presents. However, as previously stated within our representations on the Regulation 18 Plan, it is not necessarily appropriate, or indeed possible for the design process for new development to respond to the 'immediate' and 'wider' area as this could stifle the creation of new characters or create a confused approach to development.  It should also be recognised in the local plan, that in some circumstances it may not be possible to achieve all of the principles identified and this policy should be applied with suitable flexibility to ensure that it is justified.
Do you agree with how the policy will be monitored?	
If no, please explain	

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

Policy/Evidence base	D1
document	
Name of respondent (or client)	Crest Nicholson Partnerships and Strategic Land
Personal reference number	ANON-AQTS-32UU-8
Full reference number	ANON-AQTS-32UU-8/8/D1
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	[Please see formatted submission sent by email] - tracked changes cannot be shown in Citizenspace or in this Excel spreadsheet)  Crest Nicholson fully supports the Council's objective of achieving high quality, well designed and inclusive places through Strategic Policy D1. Crest Nicholson is committed to enhancing the communities of Winchester (notably, North Whiteley) through making good design fundamental to all its proposals in the authority. The Design and Access Statement which will support the planning application includes design principles for the site and demonstrates how it connects and extends into the surrounding context in keeping with Active Travel Principles.  Crest Nicholson has developed a proposal of high-quality design that responds to the established local context of the area and is informed by the design principles of Strategic Policies D1 and D3, the 10 characteristics of good design set out in the National Design Guide and the objectives of paragraphs 131 and 132 of the Framework.  Amongst other things Policy D1 states:  "All development should use high quality materials that are attractive and durable and appropriate to the context and the proposed design."  The word 'attractive' is open to interpretation and therefore does not comply with Paragraph 16 of the
What modification(s) are necessary to make the policy legally compliant or	Framework which requires policies to be 'clearly written' and 'unambiguous'.  Deletion of the word 'attractive' to comply with Paragraph 16 of the Framework. See suggested amendment to wording below.
sound?	
What is your suggested wording or text for the policy?	We suggest Policy D1 is amended as follows:  "All development should use materials that are high quality and durable and appropriate to the context and the proposed design."
Do you agree with how the policy will be monitored?	the proposed design.
If no, please explain	

Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted	Yes
supporting information?	Supporting document 1 (Policy SP1 comments)
All relevant information related	Supporting document 2 (Policy SP2 comments)
to the specific policy or	Supporting document 3 (Policy CN1 comments)
allocation has already been	Supporting document 4 (Policy CN3 comments)
included in the representation.	Supporting document 5 (Policy D1 comments)
However, the links provided	Supporting document 6 (Policy D3 comments)
may contain additional details,	Supporting document 7 (Policy T1 comments)
such as images, tables, or	Supporting document 8 (Policy NE5 comments)
tracked changes, if applicable.	Supporting document 9 (Policy H5 comments)
	Supporting document 10 (Policy SH2 comments)
	Supporting document 11 (Integrated Assessment (Sustainability Appraisal))

Policy/Evidence base	D1
document	
Name of respondent (or	Tony Clements
client)	
Personal reference number	ANON-AQTS-3BX4-T
Full reference number	ANON-AQTS-3BX4-T/13/D1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-	Yes
operate?	
Policy/Document comment	This comment has been summarised – see supporting information for full response.
	The primacy of Winchester Town must be front and centre in all policy decisions that are taken.  7.4 The Vision should be captured in a way that balances the necessary imperative for sustainable growth, while ensuring that the quality of place, which is recognised and valued, is preserved.  7.5 The summary of the characteristics of the setting of Winchester and the numerous historic buildings and attributes possessed by the Town are noted. However, it should be recognised that views across and toward the Town are not all equally sensitive, or constrained, as the Landscape Character assessment identifies. Views from the north, from Down Farm Lane towards the centre, are characterised predominantly by the outer suburbs of the urban area and the emerging form of the Kings Barton MDA. The significant historic forms that are identified in paragraphs 5.43 and 5.44 are characteristic, but not so in views from this direction. The opportunity to make provision for further MDA scale growth within this relatively unconstrained northern sector is significant and would not compromise the factors that are highlighted.  7.6 It is notable also that growth in this location would be contained by the line of the A34, which provides a clear and defensible demarcation between the urban sphere/envelope and the open countryside beyond.  7.7 Paragraph 5.49 notes the desire to move towards the 15-minute City model and to an urban environment that is not dominated by the car, and which supports walking and cycling. The most effective means via which such a strategy could be implemented would be through the concentration of growth at scale in locations that support such a modal shift, and which provide opportunities to masterplan new communities based around active travel.  7.8 In this regard Vistry and Taylor Wimpey support suggestions made by the City of Winchester Trust via the consultation that a masterplan for the whole of the urban area should form part of the Local Plan, with strategic growth planned for in a comprehensive manner

	spatial strategy that defines the approach of the successor Local Plan that should be prepared to meet the development challenges that will be presented by the new NPPF.
	7.9 The Winchester Town Neighbourhood Character Areas map that appears on page 82 of the plan should be expanded to focus on the full extent of the urban area of the city/town, given that the purpose of this section of the plan is to inform a vision for Winchester. The context surrounding the 2040 Plan is vitally important and this document should anticipate changes to come immediately following the conclusion of this 'interim' preparation/examination stage.
	7.10 A requirement to plan for higher levels of housing growth will be manifest once the new NPPF is published and Winchester, as the most sustainable location within the district, should be the primary focus.  7.11 This area does not necessarily need to be earmarked by this document, recognising that due process needs to be followed, but to ensure there is clarity and transparency, the explanation of the vision should highlight that future development pressures (beyond the scope of the 2040 plan) are likely to require the future expansion of the city, which this plan acknowledges and has regard to.
What modification(s) are	7.3 The key components of the Local Plan Vision for Winchester (p.80) should be revised throughout the
necessary to make the	plan as set out below
policy legally compliant or	
sound?	
What is your suggested	Local Plan Vision – Winchester
wording or text for the policy?	As the largest settlement in the district and the county town, Winchester is the principal focus for housing and employment in the area covered by the Local Plan. The Town experiences significant unsustainable daily commuting flows due to a lack of housing that is affordable to large sections of the working population. Established travel links to London also support high levels of out-commuting. Policies in this Local Plan will aim to address the imbalance between affordable homes and jobs as a key objective in the path to achieving carbon neutrality. Winchester Town is a hub for many services and facilities that benefit residents and businesses throughout the district and beyond and is the most sustainable location where growth and change can occur in response to the challenges presented by the Climate Emergency. While growth and change are needed, they must be managed sensitively in ways that preserve and enhance the important natural, historical, cultural, visual and aesthetic qualities that define the character and setting of the town.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
	Supporting Document (Planning for South Hampshire)

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

Policy/Evidence base	D1
document	
Name of respondent (or	Steven Favell
client)	
Personal reference number	ANON-AQTS-323A-J
Full reference number	ANON-AQTS-323A-J/8/D1
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	No
Policy/Document comment	No specific mention of requirement for free flowing through routes
What modification(s) are	Is the survey here to invite comment or to discuss purely whether the submission is legal? Being legal does
necessary to make the	not make it right.
policy legally compliant or	
sound?	
What is your suggested	Free flowing through routes required, devoid of unnecessary obstructions that lead to delay, increased
wording or text for the	pollution and frustration leading to erratic behaviour.
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	No
Have you submitted supporting information?	INO INO
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or client)	Hampshire Hospitals NHS Foundation Trust
Personal reference number	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
Full reference number	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/19/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	The Trust continue to fully support WCCs aspiration to promote health, social and cultural wellbeing through good design that encourage 'staying well' through walking, cycling and other health activity. The Trust support updates to Policy D1 that require the use of high-quality durable materials appropriate to context and building design.
What modification(s) are	-
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	-
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	Andrew Craig
client)	
Personal reference number	ANON-AQTS-32ZS-B
Full reference number	ANON-AQTS-32ZS-B/7/D1
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Policy D1 is not sound as it has not been positively prepared. It does not take account of the Local Plan evidence base or the local authority's wider policies on "living well". Paragraph 5.36 does not reference provision for sport and active recreation as a feature of high quality, well-designed place.
What modification(s) are	Policy D1 – and specifically the table in paragraph 5.36 – should explicitly reflect the importance of sport and
necessary to make the	active recreation to living well.
policy legally compliant or	
sound?	
What is your suggested	In the table in paragraph 5.36:
wording or text for the	- under "Nature" amend the first bullet to read: "Provide a network of high quality, green open spaces with a
policy?	variety of landscapes and activities, including sport and play" [i.e. add "sport and" before "play"] - under
	"Public spaces" amend the third bullet to read: "Make sure public spaces support social interaction and active recreation" [i.e. add "and active recreation" after "social interaction"]
Do you agree with how the	recreation [i.e. add and active recreation after social interaction]
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	100, I want to take part in a nearing cooler in an invited to by the inepoctor to participate
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base	D1
document	
Name of respondent (or	Owen Neal
client)	
Personal reference number	ANON-AQTS-3295-C
Full reference number	ANON-AQTS-3295-C/1/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Sport England considers that there is synergy with our own Active Design guidance which has been co- produced by Sport England and the Office for Health Inequalities and Disparities (OHID). This sets out a number of principles for planning and designing places and spaces which promote health and physical activity. Sport England would welcome reference to our Active Design guidance within the proposed policy. Further information can be found here: https://www.sportengland.org/guidance-and-support/facilities-and- planning/design-and-cost-guidance/active-design.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

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

Policy/Evidence base document	D1
Name of respondent (or	Tessa Robertson
client)	16334 Nobeltagii
Personal reference number	BHLF-AQTS-326P-4
Full reference number	BHLF-AQTS-326P-4/9/D1
Legally compliant?	No
Sound?	No
Complies with duty to co-	Yes
operate?	
Policy/Document comment	Full response on website.
	In the objections set out in our comments we contend that the current draft of the plan is unsound on the grounds either of being unjustified or ineffective and in some instances not consistent with the draft National Planning Policy Framework 2024 (NPPF).  This policy is wide ranging and embraces many different factors that contribute to good design and is improved by the amendments following the consultation on the Regulation 18 Plan. There is though one aspect that is missing which is related to the word 'inclusive' in the heading of this policy.  The word 'community' and the importance in creating a sense of this within a development is missing from the policy which most housing estates fail to make any effort to embrace. A well-integrated community helps to reduce petty crime and anti-social behaviour and makes for a development which engenders a sense of pride in its residents.  An example of a development with a good sense of community was experienced by the Trust's team of judges adjudicating the City of Winchester Trust's 2024/25 Design Awards. When they visited the recent development at Lovedon Fields on the boundary of Kings Worthy, they saw a well-integrated community enjoyed by the residents with its sense of enclosure that has encouraged community interaction across the common areas.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested	A clause along the following lines could be added to the policy:
wording or text for the	"The layout and design of new housing, particularly for larger developments, should encourage community
policy?	interaction, that provide places to live in favour of pedestrians and create a safe and sociable environment".
Do you agree with how the	
policy will be monitored?	
If no, please explain	
· · · · · · · · · · · · · · · · · · ·	

Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted	Yes
supporting information?	Form (copy of form - response detailed in letter)
All relevant information related	Letter (commenting on policies)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	National Grid Electricity Transmission
client)	
Personal reference number	BHLF-AQTS-326V-A - National Grid Electricity Transmission
Full reference number	BHLF-AQTS-326V-A - National Grid Electricity Transmission/1/D1
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Full response on website.
	About National Grid Electricity Transmission
	National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.
	National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted
	independently. National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET. Utilities Design Guidance
	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET.
	NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.
	Therefore, to ensure that Strategic Policy D1 is consistent with national policy we would request the inclusion of a policy strand such as:
	"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."  Further Advice
	NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

What modification(s) are necessary to make the policy legally compliant or sound?	To ensure that Strategic Policy D1 is consistent with national policy we would request the inclusion of a policy strand such as: "x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."
What is your suggested wording or text for the policy?	To ensure that Strategic Policy D1 is consistent with national policy we would request the inclusion of a policy strand such as: "x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form (Copy of form - refers to letter)
All relevant information related	Letter (commenting on D1)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	National Gas Transmission
client)	
Personal reference number	BHLF-AQTS-326W-B - National Gas Transmission
Full reference number	BHLF-AQTS-326W-B - National Gas Transmission/1/D1
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Full response on website
	National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the
	following representation with regard to the current consultation on the above document.  About National Gas Transmission
	National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In
	the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where
	pressure is reduced for public use.
	Utilities Design Guidance
	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.
	National Gas Transmission advocates the high standards of design and sustainable development forms
	promoted through national planning policy and understands that contemporary planning and urban design
	agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.
	Therefore, to ensure that Strategic Policy D1 is consistent with national policy we would request the inclusion of a policy strand such as:
	"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."
	Further Advice
	National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.
	Please see attached information outlining further guidance on development close to National Gas
	Transmission assets.
What modification(s) are	Therefore, to ensure that Strategic Policy D1 is consistent with national policy we would request the inclusion
necessary to make the	of a policy strand such as:
policy legally compliant or	"x. taking a comprehensive and co-ordinated approach to development including respecting existing site
sound?	constraints including utilities situated within sites."

Foods to the second sec	
What is your suggested	Therefore, to ensure that Strategic Policy D1 is consistent with national policy we would request the inclusion
wording or text for the	of a policy strand such as:
policy?	"x. taking a comprehensive and co-ordinated approach to development including respecting existing site
	constraints including utilities situated within sites."
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on D1)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	Shirlene Oh
client)	
Personal reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
Full reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/19/D1
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Full response on website Strategic Policy Spaces D1 The Trust continue to fully support WCCs aspiration to promote health, social and cultural wellbeing through good design that encourage 'staying well' through walking, cycling and other health activity. The Trust support updates to Policy D1 that require the use of high-quality durable materials appropriate to context and building design.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	<u>Letter (Commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

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

Policy/Evidence base	D1
document	
Name of respondent (or	Craig Hatton
client)	
Personal reference number	BHLF-AQTS-32YH-Y - Network Rail
Full reference number	BHLF-AQTS-32YH-Y - Network Rail/6/D1
Legally compliant?	
Sound?	Yes
Complies with duty to co- operate?	
Policy/Document comment	Full response on website  Network Rail consider this Policy to be sound and are supportive of making access to public transport easier as in part iii of the Policy. This would fit with Network Rail's policy on first and last mile to provide safe, continuous access from home to a rail station for pedestrians and cyclists where possible.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base	D1
document	
Name of respondent (or	Georgina Cox
client)	
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/16/D1
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Gladman appreciates design solutions are to be informed by a contextual survey and analysis of the development site's constraints and opportunities. Gladman takes a creative approach to design to deliver developments that are memorable to both its residents and the wider community.  Gladman takes a contextual approach that involves taking different architectural styles from the local area and creating its own mix of building styles that maintain and enhance the character of the local area. This process avoids development copying its surrounding buildings and enables original developments to come forward.  The National Design Guide: Planning practice guidance for beautiful, enduring & successful places (January 2021), the recently adopted National Planning Policy Framework (2023) and National Model Design Code (updated October 2021) set the framework for the characteristics for creating beautiful, high quality sustainable places.  Gladman endorse the design-led approach to create healthy, safe, green, environmentally responsive, sustainable and distinctive beautiful places, and actively encourage a joined-up coordinated approach between the key disciplines especially landscape, ecology, drainage and masterplanning, and in close liaison with key stakeholders. A range of different disciplines across sectors are involved at an early stage to produce a range of ideas, interventions and solutions to help shape future development.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	

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

Policy/Evidence base	D1
document	
Name of respondent (or	Wates Developments Ltd
client)	·
Personal reference number	BHLF-AQTS-328X-E
Full reference number	BHLF-AQTS-328X-E/20/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Wates supports the principles set out in proposed Strategic Policy D1. The Council's approach to high quality, well designed, places chimes with Wates own approach to promoting sites for development.  5.2 Wates recognises the importance of quality design and place making, indeed the NPPF contains an entire chapter (12) on the subject. Paragraph 126 of the NPPF explains that:  "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."  5.3 Proposed Strategic Policy D1 follows the principles set out in the NPPF and adds some local context, it is therefore a 'sound' policy.  5.4 An element of design should continue to be reserved for Neighbourhood level and where positive and aiding in the delivery of development in the production of site-specific design codes. This is because design is often reflective of site-specific circumstances. As advocated by paragraph 129 of the NPPF, design codes can sometimes be prepared by landowners and developers.
What modification(s) are necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	

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

Policy/Evidence base	D1
document	
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-3286-C
Full reference number	BHLF-AQTS-3286-C/19/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Full response on website Wates supports the principles set out in proposed Strategic Policy D1. The Council's approach to high quality, well designed, places chimes with Wates own approach to promoting sites for development.  5.2 Wates recognises the importance of quality design and place making, indeed the Framework contains an entire chapter (12) on the subject. Paragraph 126 of the Framework explains that:  "The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."  5.3 Proposed Strategic Policy D1 follows the principles set out in the Framework and adds some local context, it is therefore a 'sound' policy.  5.4 An element of design should continue to be reserved for Neighbourhood level and where positive and aiding in the delivery of development in the production of site-specific design codes. This is because design is often reflective of site-specific circumstances. As advocated by paragraph 129 of the Framework, design codes can sometimes be prepared by landowners and developers.  5.5 The Vision Document for Land at Brightlands shows how a well set out and accessible development could be achieved. The development would be sustainable and inclusive, and this could be achieved with a greater site capacity of around 120 new dwellings.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	

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

Policy/Evidence base	D1
document	
Name of respondent (or	Wates Developments Ltd. ('Wates')
client)	
Personal reference number	BHLF-AQTS-328G-W
Full reference number	BHLF-AQTS-328G-W/18/D1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	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
	5.1 Wates supports the principles set out in proposed Strategic Policy D1. The Council's approach to high
	quality, well designed, places chimes with Wates own approach to promoting sites for development.
	5.2 Wates recognises the importance of quality design and place making, indeed the NPPF contains an entire chapter (12) on the subject. Paragraph 126 of the NPPF explains that:
	"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the
	planning and development process should achieve. Good design is a key aspect of sustainable development,
	creates better places in which to live and work and helps make development acceptable to communities.
	Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is
	effective engagement between applicants, communities, local planning authorities and other interests
	throughout the process."
	5.3 Proposed Strategic Policy D1 follows the principles set out in the NPPF and adds some local context, it is
	therefore a 'sound' policy.
	5.4 An element of design should continue to be reserved for Neighbourhood level and where positive and
	aiding in the delivery of development in the production of site-specific design codes. This is because design is
	often reflective of site-specific circumstances. As advocated by paragraph 129 of the NPPF, design codes can
	sometimes be prepared by landowners and developers.
	5.5 The Vision Document for Land at Pudding Farm shows how a well set out and accessible development
	could be achieved. The development would be sustainable and inclusive, and this could be achieved with a
	greater site capacity of around 120 new dwellings.

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

Policy/Evidence base	D1
document	
Name of respondent (or	Winchester College
client)	Trimonoster Comago
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/19/D1
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	The College supports the amendment to this policy which includes:
	– Amend criteria iv and vii to note "where appropriate".
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form (commenting on policies)
All relevant information related	Supporting information (Map - Blackbridge Yard)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D1
document	
Name of respondent (or	Lorna Selby
client)	
Personal reference number	BHLF-AQTS-32QQ-Z
Full reference number	BHLF-AQTS-32QQ-Z/12/D1
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Within Strategic Policy D1: High Quality, Well Designed and Inclusive Places, amendments should be made to include relevant citation to the recommendations of the Building Better Building Beautiful Commission15. Prioritizing beauty in new developments is important for maximising green infrastructure, as an essential component of well-designed places. Beauty helps determine design quality and set a valuable quality-control framework, as derived from shared understandings including an appreciation for 'green' features.24 Retaining and enhancing these green features within developments is essential to support nature's recovery, and to promote a positive view among existing residents of what beautiful and sustainable new development can look like. The Building Better, Building Beautiful Commission identified that opposition to new development commonly links to concerns about visual and environmental impacts. Beautiful developments, which enhance local green spaces and incorporate urban greening can alleviate uncertainty about new development.  Beauty has represented a valuable additional emphasis on design quality in the planning process, and likewise an 'enabling' tool for community engagement in planning and plan making. Its removal risks potentially undermining public confidence and support for development, as well as associated engagement in the design process. Likewise, removal of this additional emphasis on quality, and the body of work that sits behind it through BBBBC, risks the loss of this key influence on design quality and plan making, with a valuable, central component being the emphasis on the role of green and blue infrastructure.  To ensure the Local Plan aligns with current best practise, we recommend the Council follow the examples set by other LPAs, and the Welsh Government's wording in Planning Policy Wales16, in strengthening the local plans policy requirements to specifically recommend that all proposals for green infrastructure will be expected to be designed with the Building with Nature sta
What modification(s) are necessary to make the policy legally compliant or sound?	

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

## WCC Response.

Comments noted.

#### WCC Recommended Changes arising from representations:

No changes apart from:

<u>Proposed Modification</u> to Policy D1 for clarification and to supporting text to reflect representations by utility organisations.

Proposed Modification to supporting text para. 5.38 to note utility infrastructure.

Proposed Modification to supporting text para. 5.40 to provide examples of relevant national guidance. 38

Proposed Modification to remove reference to Open Space Improvement Plan from table of relevant local evidence on page 74

Local Plan Reference	Policy D2			
or document			Design Princip	les for Winchester Town
Total Number of Representations received		17		
Number of respondents who confirmed they consider the policy is –		Yes	No	
Legally Compliant		7	4	
Sound		5	9	
Complies with Duty to Cooperate		7	4	

#### **Summary of Representations**

Representations cover various urban development issues in Winchester, including objection to:

- Relocation of the bus station.
- Closure of Andover Road to through traffic

A number question the funnelling of traffic through the city centre and the lack of proposed solutions to resolve this, including a request for a spatial plan for Winchester Town being considered as movement is fundamental to the success of the development sites and how the whole Town functions. A coherent spatial plan provides the opportunity to integrating community views and addressing the city's unique character while promoting sustainable development.

Some representations refer to the enhancement of healthcare and other social infrastructure within the urban area of the City.

The policy needs to incorporate an element of flexibility through addition of 'where appropriate to the development proposed' prior to the criteria listed.

Another respondent questions the need for the policy in that most of it is a repetition of D1

**Representation Numbers** (Statutory consultees in bold and named)

ANON-AQTS-32U8-B/Historic England (this representation does not have a full rep number because it was not directly entered into Citizenspace)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/62/D2

ANON-AQTS-3BSY-T/82/D2

ANON-AQTS-32CD-5 - Colden Common Parish Council/45/D2

ANON-AQTS-32UZ-D/4/D2

ANON-AQTS-32G7-V/14/D2

ANON-AQTS-32TP-2/1/D2

ANON-AQTS-323A-J/6/D2

ANON-AQTS-32MQ-V/8/D2

BHLF-AQTS-326P-4/7/D2

BHLF-AQTS-32YT-B/1/D2

BHLF-AQTS-32YQ-8/6/D2

BHLF-AQTS-32YB-S/1/D2

#### BHLF-AQTS-32YH-Y - Network Rail/5/D2

BHLF-AQTS-328X-E/19/D2

BHLF-AQTS-328G-W/17/D2

BHLF-AQTS-328K-1/17/D2

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

- Need for clarity, flexibility and to avoid repletion with Policy D1 and other policies in the Design Topic; and
- Consider preparation of a spatial plan for Winchester with the topic of movement as a basis, to ensure appropriately located development.

Policy/Evidence base	D2
Policy/Evidence base document	DZ
5.0000000000000000000000000000000000000	Con Debine on
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the policy	
legally compliant or sound?	
What is your suggested	
wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.	
However, the links provided may	
contain additional details, such	
as images, tables, or tracked	
changes, if applicable.	

Policy/Evidence base	D2
document	Lieu Fielde
Name of respondent (or client)	Lisa Fielding
Personal reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
Full reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/62/D2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	The policy sets out the approach to design that WCC expects promoters of development to use to inform their proposals. Criteria are set out which includes reference to community engagement, existing patterns of development, improving local connections, better environment for pedestrians and cyclists and the retaining and enhancing of existing green spaces and including more public spaces. The Parish Council considers that new development should make a positive contribution to the area in which it is located and be integrated with it. The Parish Council supports criteria i-viii of the policy. Support Policy D2 i-viii
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	

Policy/Evidence base	D2
document	
Name of respondent (or	Rob Edgecock
client)	
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/82/D2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	The policy is well thought-out.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy? Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/45/D2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	No. I don't want to take part in a bearing acceion
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base document	D2
Name of respondent (or	Sandra McLaren
client)	Canara Mozaron
Personal reference number	ANON-AQTS-32UZ-D
Full reference number	ANON-AQTS-32UZ-D/4/D2
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	No
Policy/Document comment	Page 85, section 5.5 b: "Move the bus station to the rail station area". Does not make sense as the current position of the bus station is on level ground with main shops and market nearby, and is well placed to meet the needs of passengers with pushchairs, or with limited mobility or with heavy shopping bags.  Page 86, section 5.57 states "It should be acknowledged that some of these identified opportunities [in section 5.56] are in close proximity to, and have the potential to impact upon, important ecological assets including the Winnall Moors Nature Reserve and River Test". This is not acceptable as that encroachment / impact surely should not be even considered, never mind allowed.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	Page 85, section 5.5 b: "Move the bus station to the rail station area". Does not make sense as the current position of the bus station is on level ground with main shops and market nearby, and is well placed to meet the needs of passengers with pushchairs, or with limited mobility or with heavy shopping bags.  Page 86, section 5.57 states "It should be acknowledged that some of these identified opportunities [in section 5.56] are in close proximity to, and have the potential to impact upon, important ecological assets including the Winnall Moors Nature Reserve and River Test". This is not acceptable as that encroachment / impact surely should not be even considered, never mind allowed.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this policy?	
Have you submitted supporting information?	No

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

Policy/Evidence base document	D2
Name of respondent (or	Bargate Homes
client)	2 5.1 9 - 1 - 1 - 1 - 1 - 1
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/14/D2
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	No
Policy/Document comment	Bargate Homes recognise the importance of Winchester City as one of the district's principal centres, and the need for development proposals in and around Winchester City to be based on key design principles. The vision for Salters Lane has been directly informed by the distinct character of the local area and will respond positively and reinforce patterns of development in line with part iv). This is reflected in the approach to density and built form, which varies across the site, denoting the dual orientation of facing the more rural Sparsholt ward to the west, and equally Winchester City to the east. The site has therefore been designed to represent a sensitive addition to Winchester City, transitioning between urban and rural character. In light of the site's favourable location on the edge of Winchester City, adjacent to its built up area boundary, and with its good connections into Winchester centre, there has been a particular emphasis on improving and enhancing connections into and through the site, including via pedestrians and cyclists in particular. Part vii. of the draft policy notes the important of existing green open space and provision of public open space and planting. The concept plan shows the potential for open space to occupy up to 50% of the site, along with additional landscaping and planting.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	
Name of respondent (or	David James
client)	
Personal reference number	ANON-AQTS-32TP-2
Full reference number	ANON-AQTS-32TP-2/1/D2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	No
operate?	
Policy/Document comment	Running the Andover Rd through the new development is madness and should be addressed
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy? Have you submitted	No
supporting information?	INO
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	
Name of respondent (or	Steven Favell
client)	
Personal reference number	ANON-AQTS-323A-J
Full reference number	ANON-AQTS-323A-J/6/D2
Legally compliant?	No
Sound?	No
Complies with duty to co-	No
operate?	
Policy/Document comment	No solutions to funnelling through traffic into the city centre
What modification(s) are	Is the survey here to invite comment or to discuss purely whether the submission is legal? Being legal does
necessary to make the	not make it right.
policy legally compliant or	
sound?	
What is your suggested	Opportunities to develop outer ring routes allowing North / South and East West travel, avoiding the central
wording or text for the	city should be pursued.
policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	res, I want to take part in a hearing session in anninvited to by the hispector to participate
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	
Name of respondent (or	Union4 Planning Ltd
client)	
Personal reference number	ANON-AQTS-32MQ-V
Full reference number	ANON-AQTS-32MQ-V/8/D2
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Vision for Winchester While we support the vision for Winchester on page 80, this should also refer to the enhancement of healthcare and other social infrastructure within the urban area of the City.  There is a continuing need to renew and replace the healthcare and other social infrastructure of the district to meet the needs of the existing and growing population and reflect changes and improvements in the standards and delivery of health services. This is a fundamental part of sustainable development and increasing social equity and healthy lifestyles. At present the focus is predominantly on housing and employment and social infrastructure is neglected.  In the absence of this, the statement does not reflect the rounded needs of the district and is unsound and ineffective.  Paragraph 5.45  The paragraph should advise that while it is expected that new buildings should be of a scale which is sympathetic to others in the surrounding area, they should also seek to optimise density and the efficient use of land within the urban area.  In the absence of this, the statement is at odds with the NPPF and is unsound.  Policy D2  Policy D2 lacks a positive commitment to the development needs of the area and the focus of the LP examination on policies which are prescribed in the consultation pro-forma, does not allow for comments and objections to the visions which the policies reference. The consultation does not therefore, allow for comments on substantive issues that policies reference. The consultation does not therefore, allow for comments on substantive issues that policies reference. The consultation does not therefore, allow for comments on substantive issues that policies reference in the individual criteria. The preamble to the policy should therefore, include a positive commitment to the development and growth of Winchester as the primary true and also grize to the artistic literal to the development and growth of Winchester as the primary true and also grize to the artistic literal extents to the developm
M/hat madification(a) see	town and also prior to the criteria listed contain the phrase 'where appropriate to the development proposed'.
What modification(s) are	Vision for Winchester
necessary to make the	While we support the vision for Winchester on page 80, this should also refer to the enhancement of healthcare and other social infrastructure within the urban area of the City.

# policy legally compliant or sound?

There is a continuing need to renew and replace the healthcare and other social infrastructure of the district to meet the needs of the existing and growing population and reflect changes and improvements in the standards and delivery of health services. This is a fundamental part of sustainable development and increasing social equity and healthy lifestyles. At present the focus is predominantly on housing and employment and social infrastructure is neglected.

In the absence of this, the statement does not reflect the rounded needs of the district and is unsound and ineffective.

Paragraph 5.45

The paragraph should advise that while it is expected that new buildings should be of a scale which is sympathetic to others in the surrounding area, they should also seek to optimise density and the efficient use of land within the urban area.

In the absence of this, the statement is at odds with the NPPF and is unsound.

Policy D2

Policy D2 lacks a positive commitment to the development needs of the area and the focus of the LP examination on policies which are prescribed in the consultation pro-forma, does not allow for comments and objections to the visions which the policies reference. The consultation does not therefore, allow for comments on substantive issues that policies rely on but which are not reflected in the policies themselves. It also sets out a range of considerations some of which will be relevant only to a limited set of proposals depending on whether they lie within the areas noted in the individual criteria. The preamble to the policy should therefore, include a positive commitment to the development and growth of Winchester as the primary town and also prior to the criteria listed contain the phrase 'where appropriate to the development proposed'.

# What is your suggested wording or text for the policy?

Vision for Winchester

While we support the vision for Winchester on page 80, this should also refer to the enhancement of healthcare and other social infrastructure within the urban area of the City.

There is a continuing need to renew and replace the healthcare and other social infrastructure of the district to meet the needs of the existing and growing population and reflect changes and improvements in the standards and delivery of health services. This is a fundamental part of sustainable development and increasing social equity and healthy lifestyles. At present the focus is predominantly on housing and employment and social infrastructure is neglected.

In the absence of this, the statement does not reflect the rounded needs of the district and is unsound and ineffective.

Paragraph 5.45

The paragraph should advise that while it is expected that new buildings should be of a scale which is sympathetic to others in the surrounding area, they should also seek to optimise density and the efficient use of land within the urban area.

In the absence of this, the statement is at odds with the NPPF and is unsound.

Policy D2

	Policy D2 lacks a positive commitment to the development needs of the area and the focus of the LP examination on policies which are prescribed in the consultation pro-forma, does not allow for comments and objections to the visions which the policies reference. The consultation does not therefore, allow for comments on substantive issues that policies rely on but which are not reflected in the policies themselves. It also sets out a range of considerations some of which will be relevant only to a limited set of proposals depending on whether they lie within the areas noted in the individual criteria. The preamble to the policy
	should therefore, include a positive commitment to the development and growth of Winchester as the primary town and also prior to the criteria listed contain the phrase 'where appropriate to the development proposed'.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	Table Debodes
Name of respondent (or client)	Tessa Robertson
Personal reference number	BHLF-AQTS-326P-4
Full reference number	BHLF-AQTS-326P-4/7/D2
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Full representation on website. In the objections set out in our comments we contend that the current draft of the plan is unsound on the grounds either of being unjustified or ineffective and in some instances not consistent with the draft National Planning Policy Framework 2024 (NPPF). In the Trust's response to this policy in the consultation on the Regulation 18 plan we asked for amendments to paragraph ii. to include the possibility of a spatial plan for Winchester Town being prepared which the Trust has promoted over many years. The City Council agreed to additions to the planning documents that could be prepared without specific reference to a spatial plan for the whole town.  The need for a spatial plan for the Town has become more urgent given the several significant development sites in and around the Town which are indicated in the work arising out of the Winchester Design workshop illustrating the areas of opportunity referred to in the supporting text in paragraphs 5.52 – 5.61. There has been a history of abandoned attempts to progress development with both the Central Winchester Regeneration Area and the Station Approach area. A spatial plan for the town would help to progress those and other sites and enable their impact on each other and the whole Town to be considered and is more likely to lead to developments that are generally successful and welcomed.  Fundamental to the success of the development sites and the whole Town is how movement is planned. There are references to the Winchester Movement Strategy in this policy and elsewhere in the Local Plan, but this is lacking in content at the moment and just has the overall aim of reducing traffic. A spatial plan would help to accelerate the development of the Movement Strategy in a long-term visionary way, and this would be in line with the approach taken in the revised paragraph 112 in the 2024 draft of the NPPF.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	The Local Plan should include a positive reference to the benefits of a spatial plan for the Town. Something along the lines of the following is offered for inclusion in the Plan:

	"There is an opportunity to bring together all the evaluative and creative design work which has taken place and will continue to take place under one umbrella, in the form of a spatial plan for Winchester Town. This would include the key outputs of the Winchester Town Vision, develop further the findings from the Winchester Design Workshop (including the Areas of Opportunity), include long-term proposals in the Winchester Movement Strategy including the Winchester Local Cycling and Walking Plan, Local Area Design Codes and the Development Allocations for Winchester. (Policies W1 – W11). The production of a spatial plan for Winchester Town would include community and stakeholder engagement and would be a flexible spatial plan providing an urban design framework to assist the evaluation of proposals and initiatives as they come forward over the plan period".
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.	Yes Form (copy of form - response detailed in letter) Letter (commenting on policies)

Policy/Evidence base	D2
document	
Name of respondent (or	Mary Pearson
client)	
Personal reference number	BHLF-AQTS-32YT-B
Full reference number	BHLF-AQTS-32YT-B/1/D2
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	I am strongly opposed to the Council's stated intention to remove the bus station from its location in central Winchester (Proposed Submission Local Plan 'Regulation 19' 'Your Place: Your Plan p.85 5.5 "Move the bus station to the rail station area and develop the site with city centre uses".
	I believe that many residents of Winchester and the surrounding area are unaware of this proposal and likely to remain so until it is too late.
	I understand that the plan is to incorporate buses into a transport 'hub' near to the railway station (a steep walk up the High Street from the city centre, impossible for some and impractical for shoppers and tourists.
	Brighton's bus 'hub' may work there, but Winchester and Brighton are not comparable. Brighton & Hove are designed on a grid pattern with the sea alongside. Winchester, however, having arisen organically from its location in a river valley, is centred on that valley floor. The tourist office, cathedral, sites of historical interest, civic offices, shopping centre, market, river, main parks and (too?) many eating places, are all there, together, conveniently, with the bus station.
	The present bus station has much to commend it. Some distance from the busy road system, it is quiet, airy and spacious. Buses and information screens are easily visible, while seating is adequate and functional. It is well placed to meet the needs of those changing buses, and others with pushchairs, limited mobility and heavy shopping bags. The Council should not deprive the residents of Winchester and surrounding areas of such an asset, albeit one they may not have realised was at risk.
	Proceeds from the sale of the land and new projects on it may excite councillors more than does maintaining a vital community asset, currently taken for granted. But I believe the majority of constituents would wish for the bus station to be smartened up a bit and for it to remain where it is - opposite Winchester's Guildhall. Bus travel to, from and in Winchester should be promoted, thus reducing car usage - something, incidentally, that would be likely to rise should the central bus station vanish.

	Please think again - and do not be swayed by headline projects
What modification(s) are	
necessary to make the	
policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	
Name of respondent (or	Liz Kessler
client)	
Personal reference number	BHLF-AQTS-32YQ-8
Full reference number	BHLF-AQTS-32YQ-8/6/D2
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Strategic Policy D2 Design Principles for Winchester
	While the aspirations identified in this policy are supported in principle during the previous consultation, Reg 18, I, and many others highlighted the need for a city wide spatial plan as being essential to ensure that development was not piecemeal, considered on a site by site basis, but looked at the town holistically and indeed identified opportunities that have not surfaced as part of this site by site approach. Crucial to this is the Movement Strategy, referred to in section viii. Like this Plan the Movement Strategy and the other HCC transport plans are still aspirational and have not yet been linked to design or plotted on a street by street basis and linked to these development areas; this needs to be embedded in the spatial plan. Without this work I wonder how this policy can effectively guide delivery. The Winchester Vision 2020 - 2030 was intended to by the beginning of this process; it identified next steps but these have never come to fruition. Similarly the Winchester Design Workshops identified Areas of Opportunity but gave no indication about how any of this would be realised. Consideration of the separate sites, as identified below, fails to make connections between them or consider them, and many others, together so that there is a clear spatial vision for Winchester, with the different elements adding value to each other rather than competing, duplicating or missing opportunities - a Plan as suggested would prevent this.
What modification(s) are	
necessary to make the	
policy legally compliant or sound?	
What is your suggested wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
ii iio, picase expiaiii	

Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.	No No

Policy/Evidence base	D2
document	
Name of respondent (or	Paul R Draper
client)	
Personal reference number	BHLF-AQTS-32YB-S
Full reference number	BHLF-AQTS-32YB-S/1/D2
Legally compliant?	
Sound?	No
Complies with duty to co- operate?	
Policy/Document comment	5.5 b & 5.9 b
	The proposals to move the existing bus station to create a transport hub at the train station
	are deficient as they do not seem to provide details of how especially disabled users can
	gain access from it to the town centre by bus or other means sufficiently frequent as to
	adequately replace the existing bus station interchange so useful to them.
What modification(s) are	Further detail and undertakings
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	Requires the Council to propose a method for further consideration before wording can be
wording or text for the	proposed.
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form (D2)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base document	D2
	One in 11-44- in
Name of respondent (or	Craig Hatton
client)	DINE ACTO COVILLY, N. C I. D. II
Personal reference number	BHLF-AQTS-32YH-Y - Network Rail
Full reference number	BHLF-AQTS-32YH-Y - Network Rail/5/D2
Legally compliant?	
Sound?	Yes
Complies with duty to co- operate?	
Policy/Document comment	Full response on website Network Rail believe this Policy to be sound and is supportive of the principles governing growth within Winchester Town. This is especially the case with the promotion of Transport Strategies within part xiii.
What modification(s) are	Transport ou atogree Within part XIII.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D2
document	
Name of respondent (or client)	Wates Developments Ltd
Personal reference number	BHLF-AQTS-328X-E
Full reference number	BHLF-AQTS-328X-E/19/D2
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Wates is unclear of the specific value of proposed Policy D2. Whilst the intensions of the policy are clear, and Wates strongly supports well designed new places, the need to have a set of development management policies which follow proposed Strategic Policy D1, is not justified.  5.6 Proposed policies D2, D3 and D4 all follow a similar structure which all relate back to proposed Strategic Policy D1. There is little additional detail, and no more direct guidance for the decision maker in the non-strategic policies, and in essence each policy is setting out that design should respond to its surrounds and context. Having additional repetitive policies is unhelpful for effective and efficient decision making.
What modification(s) are necessary to make the policy legally compliant or sound?	Delete the policy and include its wording in Strategic Policy D1.
What is your suggested wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form (refers to letter)
All relevant information related	Letter (commenting on policies and evidence base)
to the specific policy or	
allocation has already been	
included in the representation.	

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

Policy/Evidence base document	D2
Name of respondent (or	Wates Developments Ltd. ('Wates')
client)	vvales bevelopments Etc. ( vvales )
Personal reference number	BHLF-AQTS-328G-W
Full reference number	BHLF-AQTS-328G-W/17/D2
Legally compliant?	Yes
Sound?	No
Complies with duty to co-	Yes
operate?	
Policy/Document comment	Full response on website
	Legally compliant Yes
	Positively prepared Yes
	Sound No
	Justified No
	Compliant with the duty to cooperate Yes
	Effective No
	Compliant with national policy No
	5.6 Wates is unclear of the specific value of proposed Policy D2. Whilst the intensions of the policy are
	clear, and Wates strongly supports well designed new places, the need to have a set of development
	management policies which follow proposed Strategic Policy D1, is not justified.
	Proposed policies D2, D3 and D4 all follow a similar structure which all relate back to proposed Strategic
	Policy D1. There is little additional detail, and no more direct guidance for the decision maker in the
	non-strategic policies, and in essence each policy is setting out that design should respond to its
	surrounds and context. Having additional repetitive policies is unhelpful for effective and efficient
	decision making.
What modification(s) are	Necessary modification to the Policy
necessary to make the	5.8 Delete the policy and include its wording in Strategic Policy D1.
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
, p	

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

Policy/Evidence base	D2
document	
Name of respondent (or	Winchester College
client)	
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/17/D2
Legally compliant?	
Sound?	No
Complies with duty to co- operate?	
Policy/Document comment	Previous Representation made by Winchester College – Regulation 18 consultation Winchester College support the principle of the City Council's approach to achieving high quality design for Winchester Town defined in Strategic Policy D2. However, for clarity, the College requests that the wording of the policy is amended to take account of the fact that the criteria listed will not be appropriate for all development proposals.  For site security and safeguarding reasons development proposals within the Winchester College estate are unlikely to be able to provide more public spaces as required by (vii).  The College therefore requests that the policy is amended as [set out in separate submitted document]. WCC Officer Comments in relation to the Regulation 18 consultation  It is accepted that it may not always be appropriate to deliver new public spaces, but the policy states proposals should demonstrate how they address this policy aim. Therefore it is considered that, as worded, the policy would allow such circumstances to be taken into account.  Representation made by Winchester College – Regulation 19 consultation  Winchester College is grateful that the City Council recognises that it may not always be appropriate to deliver new public spaces. However, as worded, the policy does not make it clear that in such circumstances the requirement for new public spaces would be not apply. Including the suggested text would mean that the policy is clear and unambiguous (suggested additional text is underlined); "The retention and opportunities for enhancement of existing green open spaces, public realm including more public spaces where appropriate, more natural of the high street."  Winchester College notes the additional policy text added under point viii:  'The delivery transport improvements identified in the Winchester Movement Strategy, Winchester Walking Strategy and City of Winchester Local Cycling and Walking Infrastructure Plan and other relevant transport documents that have been prepared and con

	Travel. Chapter 6 – Sustainable Travel and Active Travel refers to the Winchester Movement Strategy, Winchester Walking Strategy and City of Winchester Local Cycling and Walking Infrastructure Plan. As such, Point viii under Policy D2 should be deleted to avoid duplication of policy.
What modification(s) are	WCC Officer Comments in relation to the
necessary to make the	Regulation 18 consultation
policy legally compliant or	It is accepted that it may not always be appropriate to deliver new public spaces, but the policy states
sound?	proposals should demonstrate how they address this policy aim. Therefore it is considered that, as worded, the policy would allow such circumstances to be taken into account.  Representation made by Winchester College – Regulation 19 consultation  Winchester College is grateful that the City Council recognises that it may not always be appropriate to deliver new public spaces. However, as worded, the policy does not make it clear that in such circumstances the requirement for new public spaces would be not apply. Including the suggested text would mean that the policy is clear and unambiguous (suggested additional text is underlined);  "The retention and opportunities for enhancement of existing green open spaces, public realm including more public spaces where appropriate, more natural of the high street."  Winchester College notes the additional policy text added under point viii:  'The delivery transport improvements identified in the Winchester Movement Strategy, Winchester Walking Strategy and City of Winchester Local Cycling and Walking Infrastructure Plan and other relevant transport documents that have been prepared and consulted on with the involved local community'  The College considers that bullet point viii is not necessary. It is not a policy requirement, but is a statement which at best should be provided as supporting text. Further, policy on delivering sustainable travel as part of development proposals is addressed in draft Local Plan policy T1 – Sustainable and Active Transport and Travel. Chapter 6 – Sustainable Travel and Active Travel refers to the Winchester Movement Strategy, Winchester Walking Strategy and City of Winchester Local Cycling and Walking Infrastructure Plan. As such,
	Point viii under Policy D2 should be deleted to avoid duplication of policy.
What is your suggested wording or text for the	Including the suggested text would mean that the policy is clear and unambiguous (suggested additional text is underlined);
policy?	"The retention and opportunities for enhancement of existing green open spaces, public
policy:	realm including more public spaces <u>where appropriate</u> , more natural of the high street.".
	The College considers that bullet point viii is not necessary and should be deleted.
De very come e ville le contin	The College considers that bullet point vill is not necessary and should be deleted.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this policy?	, , , , , , , , , , , , , , , , , , ,

# Have you submitted supporting information?

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

#### Yes

Form (commenting on policies)
Supporting information (Map - Blackbridge Yard)

WCC Response.
Comments noted.
WCC Recommended Changes arising from representations:
No changes apart from:
Proposed Modification to criterion x in Policy D2 in order to improve clarity and consistency with the wording of paragraph 5.50 in the Local Plan.

Local Plan Reference or document	Design	Principles for the South Ha	Policy D3 Impshire Urban Areas
Total Number of Representations received			5
Number of respondents who confirmed they consider the	policy is –	Yes	No
Legally Compliant		3	0
Sound		3	0
Complies with Duty to Cooperate		3	0

#### **Summary of Representations**

One focussed representation from a developer, which refers to on ensuring high-quality design proposals that comply with strategic policies, with particular emphasis on aligning with Strategic Policies D1 and D3, with reference to the development of North Whiteley MDA.

A comment was made from a neighbouring LPA that they support the design focused approach. They would welcome more detail on the exact areas to which the policy applies (plan). Support is given to the design of new strategic scale development on the edges of South Hampshire having regard to the existing communities which that development would adjoin, including those communities in Winchester's neighbouring LPAs areas.

Representation Numbers (Statutory consultees in bold and named)

**ANON-AQTS-32U8-B/Historic England** (this representation does not have a full rep number because it was not directly entered into Citizenspace)

ANON-AQTS-3BSY-T/77/D3

ANON-AQTS-32CD-5 - Colden Common Parish Council/43/D3

ANON-AQTS-32UU-8/7/D3

BHLF-AQTS-32Q2-1/1/D3 Portsmouth City Council

# Main issues raised in representations received in regulation 19 consultation

- Ensuring high-quality design proposals that comply with strategic policies;
- Support for the design focused approach; and
- More detail on the area that this would apply.

Policy/Evidence base	D3
document	
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	· ·
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the policy	
legally compliant or sound?	
What is your suggested	
wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.  However, the links provided may	
contain additional details, such	
as images, tables, or tracked	
changes, if applicable.	
changes, ii applicable.	

Policy/Evidence base	D3
document	
Name of respondent (or	Rob Edgecock
client)	ŭ .
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/77/D3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	The policy is well thought-out.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	140, I don't want to take part in a nearing session
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D3
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/43/D3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D3
document	
Name of respondent (or client)	Crest Nicholson Partnerships and Strategic Land
Personal reference number	ANON-AQTS-32UU-8
Full reference number	ANON-AQTS-32UU-8/7/D3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	[Please see formatted submission sent by email] - tracked changes cannot be shown in Citizenspace or in this Excel spreadsheet)  Crest Nicholson notes the specific design requirements for development in the South Hampshire Urban Areas under Strategic Policy D3 and is committed to working collaboratively with the local community to inform the design framework and place making principles for the further development of the North Whiteley MDA. The Design and Access Statement which will support the planning application includes design principles for the site and demonstrates how it connects and extends into the surrounding context.  Crest Nicholson will develop a proposal of high-quality design that responds to the established local context of the area and is informed by the design principles of Strategic Policies D1 and D3, the 10 characteristics of good design set out in the National Design Guide and the objectives of paragraphs 131 and 132 of the Framework.
What modification(s) are necessary to make the policy legally compliant or sound?	No changes.
What is your suggested wording or text for the policy?	No changes.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted	Yes
supporting information?	Supporting document 1 (Policy SP1 comments)
	Supporting document 2 (Policy SP2 comments)

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

Supporting document 3 (Policy CN1 comments)

Supporting document 4 (Policy CN3 comments)

Supporting document 5 (Policy D1 comments)

Supporting document 6 (Policy D3 comments)

Supporting document 7 (Policy T1 comments)

Supporting document 8 (Policy NE5 comments)

Supporting document 9 (Policy H5 comments)

Supporting document 10 (Policy SH2 comments)

Supporting document 11 (Integrated Assessment (Sustainability Appraisal))

Policy/Evidence base	D3
document	
Name of respondent (or	Tom Bell
client)	
Personal reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council
Full reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council/1/D3
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	The City Council's supports a design approach focused (Policy D3) upon the integration of new development into the existing built-up areas of South Hampshire. We would welcome more detail on the exact areas to which the policy applies (plan). We would also support reference to the design of new strategic scale development on the edges of South Hampshire having regard to the existing communities which that development would adjoin, including those communities in Winchester's neighboring LPAs areas.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

WCC Response.
Comments noted.
WCC Recommended Changes arising from representations:
None.

Local Plan Reference or document		Design Pri	nciples for Market Towi	Policy D4 ns and Rural Villages
Total Number of Representations received		8		
Number of respondents who confirmed th	ney consider the policy is –		Yes	No
Legally Compliant		5	1	
Sound		2	4	
Complies with Duty to Cooperate			5	1

#### **Summary of Representations**

Some representations question the out of date evidence base and the lack of public transport in the rural parts of the district so there is a lack of opportunity for sustainable travel, contrary to where some of the proposed allocations are located.

A representation questions the value of D4 noting its unnecessary overlap with Policy D1.

Concerns about prioritising local input over professional assessments in design and conservation, particularly within village settings, highlighting a preference for community-driven village design statements.

#### Representation Numbers (Statutory consultees in bold and named)

**ANON-AQTS-32U8-B/Historic England** (this representation does not have a full rep number because it was not directly entered into Citizenspace)

ANON-AQTS-3BSY-T/58/D4

ANON-AQTS-3B4C-5/4/D4

# ANON-AQTS-32CD-5 - Colden Common Parish Council/32/D4

ANON-AQTS-329Q-8/27/D4

ANON-AQTS-32TW-9/4/D4

BHLF-AQTS-328Q-7/10/D4

BHLF-AQTS-3286-C/13/D4

# Main issues raised in representations received in regulation 19 consultation

• Need to avoid repletion with Policy D1.

Policy/Evidence base	D4
document	
5.0000000000000000000000000000000000000	Con Dahinaan
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the policy	
legally compliant or sound?	
What is your suggested	
wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.	
However, the links provided may	
contain additional details, such	
as images, tables, or tracked	
changes, if applicable.	

Policy/Evidence base	D4
document	
Name of respondent (or	Rob Edgecock
client)	
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/58/D4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	The policy is well thought-out.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy? Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D4
document	
Name of respondent (or	Sue Wood
client)	
Personal reference number	ANON-AQTS-3B4C-5
Full reference number	ANON-AQTS-3B4C-5/4/D4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	I would like to see priority given to a VDS rather than what a planning officer deems as acceptable and
	causing no harm particularly in conservation areas.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	Van Lucent to take next in a beguing access of Lens invited to but the Increates to position to
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy? Have you submitted	No
supporting information?	INO
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base document	D4
Name of respondent (or	Debbie Harding
client)	Debble Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/32/D4
Legally compliant?	No
Sound?	No
Complies with duty to co-	No
operate?	
Policy/Document comment	We welcome early effective involvement from the community as stated in the policy D4, v We refer to policy D4, vi and refer again to poor transport provision and out of date evidence base. We are a large population with poor level of service for public transport, no cycle links and poor provision of services. The allocation of housing in SP2 is in direct conflict with this policy.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D4
document	
Name of respondent (or	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire,
client)	RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/27/D4
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	As previously stated within our representations on the Regulation 18 Plan, there is some overlap between Strategic Policy D4 and Strategic Policy D1. It is unclear why a separate policy for the Market Towns and Rural Villages is needed and as such this policy is not justified.
What modification(s) are	As previously stated within our representations on the Regulation 18 Plan, there is some overlap between
necessary to make the	Strategic Policy D4 and Strategic Policy D1. It is unclear why a separate policy for the Market Towns and
policy legally compliant or	Rural Villages is needed and as such this policy is not justified.
sound?	
What is your suggested	As previously stated within our representations on the Regulation 18 Plan, there is some overlap between
wording or text for the	Strategic Policy D4 and Strategic Policy D1. It is unclear why a separate policy for the Market Towns and
policy?	Rural Villages is needed and as such this policy is not justified.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies, policies map and evidence base)
All relevant information related	<u>Vision document (Land At Mill Lane, Wickham)</u>
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D4
document	
Name of respondent (or	Judith Anne Polak
client)	
Personal reference number	ANON-AQTS-32TW-9
Full reference number	ANON-AQTS-32TW-9/4/D4
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	There has been no community engagement in the allocation of site SU01 which was not allocated at the Reg
l oney/Bocament comment	18 stage. Hence the public have been denied their right to comment
What modification(s) are	To clare and plants have been defined then right to definition.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D4
document	
Name of respondent (or	Georgina Cox
client)	
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/10/D4
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	As stated above Gladman support Policy D1 and the importance of delivering High Quality, Well Designed and Inclusive Places through a design-led approach for development throughout the settlement hierarchy including Market Towns and Rural Villages.  Gladman ensures community engagement is undertaken to gather feedback on initial design plans and subsequently incorporate into the final design.
What modification(s) are	Subsequently meet perate into the man design.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested wording or text for the	
policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this policy?	res, I want to take part in a nearing session in ann invited to by the inspector to participate
Have you submitted	Yes
supporting information?	Form (refers to letter)
All relevant information related	Supporting information (commenting on policies and proposed site)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base document	D4
Name of respondent (or	Wates Developments Ltd. ('Wates')
client)	Trates Bevelopmente Lta. ( viates )
Personal reference number	BHLF-AQTS-3286-C
Full reference number	BHLF-AQTS-3286-C/13/D4
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Full response on webiste Legally compliant Yes Positively prepared Yes Sound No Justified No Compliant with the duty to cooperate Yes Effective No Compliant with national policy No 5.6 Wates is unclear of the specific value of proposed Policy D4. Whilst the intensions of the policy are clear, and Wates strongly supports well designed new places, the need to have a set of development management policies which follow proposed Strategic Policy D1, is not justified. Proposed policies D2, D3 and D4 all follow a similar structure which all relate back to proposed Strategic Policy D1. There is little additional detail, and no more direct guidance for the decision maker in the non-strategic policies, and in essence each policy is setting out that design should respond to its surrounds and context. Having additional repetitive policies is unhelpful for effective and efficient decision making
What modification(s) are necessary to make the policy legally compliant or sound?	Delete the policy and include its wording in Strategic Policy D1.
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	

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

Local Plan Reference or document		Policy D5 Masterplans
Total Number of Representations received		18
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	13	3
Sound	3	14
Complies with Duty to Cooperate	13	3

#### **Summary of Representations**

Various respondents raise multiple concerns regarding drafting of Policy D5, primarily revolving around its clarity and impact on planning and development processes. In particular there is concern about vague definitions and unclear criteria, which could cause delays and increase costs, potentially deterring development investment on complex and large sites. The policy also needs to look beyond the boundary of the application site and take into consideration the broader public realm and setting of the site, particularly with regard to the need and implementation of transport and other public realm features which do not stop at the site boundary.

There is also reference to that it is unclear how masterplans would be secured – if this is to be through the planning application process then this needs to be stated.

Respondents have requested clearer definitions and procedures, with more specific guidance on requirements and flexibility. This includes consideration for sites with historic permissions or minor developments to avoid unnecessary burdens. In addition, larger sites which may come forward in phases - the policy uses two definitions within the same policy which will cause confusion as to whether the intention of the policy is different depending on how the site is defined.

Reference is also made to the need for community engagement and environmental considerations (including blue/green infrastructure), ensuring these are integral to the planning process.

Representation Numbers (Statutory consultees in bold and named)

**ANON-AQTS-32U8-B/Historic England** (this representation does not have a full rep number because it was not directly entered into Citizenspace)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/73/D5

ANON-AQTS-3BSY-T/96/D5

ANON-AQTS-3BFT-8 - Crawley Parish Council/8/D5

ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/37/D5

ANON-AQTS-3291-8/10/D5

ANON-AQTS-32CD-5 - Colden Common Parish Council/50/D5

ANON-AQTS-32GG-C/10/D5

ANON-AQTS-32G3-R/5/D5

ANON-AQTS-32UM-Z/7/D5

# ANON-AQTS-32UK-X - Environment Agency/20/D5

ANON-AQTS-32NR-X/10/D5, ANON-AQTS-329Q-8/39/D5

ANON-AQTS-32U5-8/7/D5

ANON-AQTS-32G7-V/16/D5

ANON-AQTS-3BX4-T/14/D5

### ANON-AQTS-32SB-K - Defence Infrastructure Organisation/9/D5

BHLF-AQTS-32YQ-8/7/D5

BHLF-AQTS-328K-1/20/D5

# Main issues raised in representations received in regulation 19 consultation

- Policy lacks clarity in terms of its application to larger/phased sites;
- Unclear as to how masterplans will be secured; and
- Policy needs to enable masterplans to reflect the area beyond the site in terms of a sites relationship with the wider public realm.

Policy/Evidence base	D5
document	
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	· · · · · · · · · · · · · · · · · · ·
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the policy	
legally compliant or sound?	
What is your suggested	
wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.  However, the links provided may	
contain additional details, such	
as images, tables, or tracked	
changes, if applicable.	
changes, ii applicable.	

Policy/Evidence base	D5
document	
Name of respondent (or client)	Lisa Fielding
,	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council
Personal reference number	
Full reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/73/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	1. WCC are relying upon the preparation of masterplans with indicative layouts to provide the detailed planning framework to deliver the strategic allocations of the Plan. The intention of WCC is that the masterplans will be prepared by landowners and developers with input from it and following community engagement. However, as currently drafted, there is no specific requirement for the promoters of the strategic sites to engage with the local community which is a serious omission. A requirement to undertake effective engagement with the local community should be included in the policy and in paragraph 12.26 under Policy W2.  2. The reliance on landowners and developers to lead on the preparation of masterplans is of serious concern to the Parish Council as it hands control of preparing the planning framework to them. If that is WCC's preferred approach then the strategic policy and the specific site allocation policies should include much more detail, particularly where there are land-use implications. As currently drafted Policy D5 does not provide a robust framework for the delivery of strategic sites nor does it provide the necessary clarity.  3. In respect of the impact on the parish of the redevelopment of the Sir John Moore Barracks (SJMB) the Parish Council is particularly concerned that the local plan does not provide the appropriate policy framework. Policy D5 effectively delegates decisions which should be resolved in the local plan, such as the delineation of areas where a particular policy applies e.g. the boundary of a countryside gap, to a non-statutory planning document. In the case of WCC, it is not even given the status of a supplementary planning document. This reliance on other documents to set planning policy is not in accordance with the relevant Regulations or case law.  4. The status of a masterplan is not at all clear. This is of major concern for the Parish Council. For large sites such as Sir John Moore Barracks (SJMB) it is reasonable to expect, at the very least, that the Plan shou

What modification(s) are necessary to make the policy legally compliant or sound?	masterplan could then be developed as supplementary guidance with all of them being subject to effective community engagement. The current approach leaves too many important decisions to an informal process which would be developer-led and would carry little weight in the decision-making process when an application was submitted. These concerns cannot be overstated. The Parish Council objects to the policy.  5. The Plan in paragraph 5.72 states that the masterplan could be prepared at the same time as the submission of development proposals. The Parish Council considers that the masterplan should be in place well before any application is submitted to ensure that it has led the planning process and informed detailed proposals.  Object to Policy D5 as it relies upon the preparation of non-statutory planning documents to deliver the policies of the local plan in respect of strategic land allocations  Object to Policy D5 as it relies upon landowners and developers to lead the process of preparing a masterplan. That role should be undertaken by WCC  Object to Policy D5. It should be redrafted to include a specific requirement that the preparation of a masterplan must include effective and inclusive engagement with the local community.  Object to Policy D5. Paragraph 5.72 should be amended to state that masterplans must be in place before development proposals are submitted.  a. Remove the reliance on the preparation of non-statutory planning documents to deliver the policies of the local plan in respect of strategic land allocations.  b. Remove the reliance on landowners and developers to lead the process of preparing a masterplan. That role should be undertaken by WCC.
What is your suggested wording or text for the policy?	Amend the second paragraph of the policy to replace "which has involved and engaged with stakeholders and communities" with "which has been the subject of effective and inclusive engagement with stakeholders and communities"  Modify Paragraph 5.72 to state that masterplans must be in place before development proposals are submitted.
Do you agree with how the	Submitted.
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	

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

Policy/Evidence base	D5
document	
Name of respondent (or	Rob Edgecock
client)	
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/96/D5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	The master plan is well prepared and thorough.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?  If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D5
document	
Name of respondent (or client)	Henrietta Boucher
Personal reference number	ANON-AQTS-3BFT-8 - Crawley Parish Council
Full reference number	ANON-AQTS-3BFT-8 - Crawley Parish Council/8/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	xi - The policy wants to ensure open space is accessible and/or increase accessibility to existing open space. Whilst this is good, some planned developments appear so big, that more new space needs to be given over for accessibility eg a new park, new football pitch, new public footpath, not just increased access to existing space. It is important not to put excessive pressure on existing open green spaces, which effective biodiversity balance and over use.  xii - agree it may be necessary to provide alternative recreational space to mitigate potential environmental impacts of development. BUT the policy should make sure that these 'alternative' spaces should be adjacent to any developments so they benefit the people any development is effecting. No good to open up a space that local people have to use a car to get to.
What modification(s) are necessary to make the policy legally compliant or sound?	Need reassurance that new open spaces will be identified in any Masterplan and that any new recreation spaces will be directly accessible to the locality of any development.
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information?  All relevant information related to the specific policy or allocation has already been	No

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

Policy/Evidence base	D5
document	
Name of respondent (or	Morag Kirby
client)	
Personal reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
Full reference number	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/37/D5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Furthermore, Strategic Policy D5 Masterplans (pages 99 and 100) also includes the following statements which supports the requirements for developers to mitigate the direct primary care impacts:  Any application for significant development on sites occupied by major landowners/users should be preceded by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development:  x. Provide for appropriate employment provision and community facilities to serve the new development (e.g. local shops, community halls, schools and health facilities)
What modification(s) are	Todar criope, community mane, contacte and meaning of
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	

contain additional detai
as images, tables, or
ed changes, if applicab

Policy/Evidence base	D5
document	
Name of respondent (or	Foreman Homes Limited
client)	
Personal reference number	ANON-AQTS-3291-8
Full reference number	ANON-AQTS-3291-8/10/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	FH recognise the importance of value of taking maximum advantage of the pre-application stage in-line with NPPF paragraph 39, which set out the range of tools that are available to the benefit of all stakeholders. This includes FH seeking to agree the principles of the masterplan at pre-application stage with the LPA, following further evaluation of the site constraints.  FH support the principle of using Masterplans to guide large scale development. However, the policy as drafted is ambiguous and not effective. Clarity must be provided on what is meant by 'larger sites', 'significant development' and 'major landowners/users'.  Detail should also be provided on the mechanism that will be used by the Council to 'agree' the masterplan. FH are concerned that a requirement for 'agreement' prior to a planning application is without a defined process for that approval, or arbitration for disagreement (however unlikely). Furthermore, they acknowledge that some matters and interests may not be presented until the planning application is made, and therefore any interaction between an amended masterplan, phasing and delivery strategy or reserved matters that may not be in accordance with the principles purported to be approved. This presents an uneasy approach towards bringing forward any site captured by D5.  FH welcome further clarification from the LPA on this matter including whether they see approval of a masterplan being defined through a Development Brief, Design Guide or SPD according to a defined process giving clarity to all involved. Given the urgency to address the chronic housing needs that exist in all areas of the country, no Local Plan should contain policies that unnecessarily restrict the delivery of housing.
What modification(s) are necessary to make the policy legally compliant or sound?	FH recognise the importance of value of taking maximum advantage of the pre-application stage in-line with NPPF paragraph 39, which set out the range of tools that are available to the benefit of all stakeholders. This includes FH seeking to agree the principles of the masterplan at pre-application stage with the LPA, following further evaluation of the site constraints.
Souriu:	FH support the principle of using Masterplans to guide large scale development. However, the policy as drafted is ambiguous and not effective. Clarity must be provided on what is meant by 'larger sites', 'significant development' and 'major landowners/users'.

What is your suggested wording or text for the policy?	Detail should also be provided on the mechanism that will be used by the Council to 'agree' the masterplan. FH are concerned that a requirement for 'agreement' prior to a planning application is without a defined process for that approval, or arbitration for disagreement (however unlikely). Furthermore, they acknowledge that some matters and interests may not be presented until the planning application is made, and therefore any interaction between an amended masterplan, phasing and delivery strategy or reserved matters that may not be in accordance with the principles purported to be approved. This presents an uneasy approach towards bringing forward any site captured by D5. FH welcome further clarification from the LPA on this matter including whether they see approval of a masterplan being defined through a Development Brief, Design Guide or SPD according to a defined process giving clarity to all involved. Given the urgency to address the chronic housing needs that exist in all areas of the country, no Local Plan should contain policies that unnecessarily restrict the delivery of housing.  FH recognise the importance of value of taking maximum advantage of the pre-application stage in-line with NPPF paragraph 39, which set out the range of tools that are available to the benefit of all stakeholders. This includes FH seeking to agree the principles of the masterplan at pre-application stage with the LPA, following further evaluation of the site constraints.
	FH support the principle of using Masterplans to guide large scale development. However, the policy as drafted is ambiguous and not effective. Clarity must be provided on what is meant by 'larger sites', 'significant development' and 'major landowners/users'.  Detail should also be provided on the mechanism that will be used by the Council to 'agree' the masterplan. FH are concerned that a requirement for 'agreement' prior to a planning application is without a defined process for that approval, or arbitration for disagreement (however unlikely). Furthermore, they acknowledge that some matters and interests may not be presented until the planning application is made, and therefore any interaction between an amended masterplan, phasing and delivery strategy or reserved matters that may not be in accordance with the principles purported to be approved. This presents an uneasy approach towards bringing forward any site captured by D5.  FH welcome further clarification from the LPA on this matter including whether they see approval of a masterplan being defined through a Development Brief, Design Guide or SPD according to a defined process giving clarity to all involved. Given the urgency to address the chronic housing needs that exist in all areas of the country, no Local Plan should contain policies that unnecessarily restrict the delivery of housing.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	

### Have you submitted supporting information?

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

#### Yes

Letter (commenting on Policies and Evidence Base - includes tables)

Supporting document 1 (Letter re: SHELAA site CU08)

Supporting document 2 (Location Plan)

Supporting document 3 (Concept Plan)

Supporting document 4 (Illustrative masterplan)

Supporting document 5 (Access and Transport Report)
Supporting document 6 (Landscape and visual study)

Supporting document 7 (Flood Risk Assessment & Conceptual Drainage Strategy)

Supporting document 8 (Interim Ecology Assessment)

Supporting document 9 (Biodiversity Net Gain Feasibility Report)

Supporting document 10 (Statutory Biodiversity Metric)

Supporting document 11 (Preliminary Noise and Vibration Summary)

Supporting document 12 (Vision Statement - Land at Station Hill, Botley)

Policy/Evidence base	D5
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/50/D5
Legally compliant?	No
Sound?	No
Complies with duty to co-	No
operate?	
Policy/Document comment	Please define larger sites
	Please define significant development
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	N
Have you submitted	No
supporting information?  All relevant information related	
to the specific policy or allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
• • • • • • • • • • • • • • • • • • • •	
such as images, tables, or tracked changes, if applicable.	

Policy/Evidence base	D5
document	
Name of respondent (or	Mark Behrendt
client)	
Personal reference number	ANON-AQTS-32GG-C
Full reference number	ANON-AQTS-32GG-C/10/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	The policy requires proposals for larger sites that may be brought forward in phases the Council will seek to ensure that a masterplan is develop and agreed. The policy then goes on to state that proposals for significant development sites occupied by major landowners/users will be permitted where they are consistent with site wide master plan. Firstly, the policy uses two definitions within the same policy which will cause confusion as to whether the intention of the policy is different depending on how the site is defined. Secondly, it is not clear as to the scale of site either of the definition relate to, the policy therefore lacks the necessary precision to be considered effective.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form (copy of form - refers to letter)
All relevant information related	Letter (Commenting on policies and evidence base)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	

contain additional detai
as images, tables, or
ed changes, if applicab

Policy/Evidence base	D5
document	
Name of respondent (or	KW Forum Limited
client)	
Personal reference number	ANON-AQTS-32G3-R
Full reference number	ANON-AQTS-32G3-R/5/D5
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	No
Policy/Document comment	This comment has been summarised – see supporting information for full response. Same comment against policy, proposed modifications and suggested wording.
	Kennedy Wilson is the land owner of Solent Business Park, and previous pre-application discussions have indicated that a masterplan may be required.
	Whilst we understand the underlying reason for a policy on masterplans, we do not agree that they are necessary on all major development sites, and we would like to see the policy wording amended to allow discretion that in some instances, a masterplan is not required.
	We are concerned that as worded, the policy could lead to significant cost and delay to delivering development, whilst the process of agreeing a masterplan takes place, whether or not an informal masterplan or submitted as part of the application for a specific plot. At a time when it is very difficult to attract investment to sites like Solent Business Park, this cost and delay may well be off-putting for incoming occupiers.
	Solent Business Park has been subject to a number of outline applications over the years and is allocated for employment generating uses, thus tested and consulted upon through the plan making process. We argue that as a Site Allocation that has also been brought forward through a number of local plan reviews in the
	past, enough is known about the Site and how it can be developed, to exclude it from the need for another master planning exercise as described by the policy. We would be content to demonstrate broadly how a plot could be delivered without prejudicing wider development, and even to show indicatively how/where other plots, infrastructure etc could be delivered, but more than this would be unjustified. The policy should reflect
	there may be circumstances like at Solent Business Park where an alternative and site specific approach is needed. After the first paragraph we suggest:
	"Site Allocations that have extant or historic outline planning permissions will not be required to produce a new masterplan. Development proposals will be required to demonstrate that they do not prejudice the
	delivery of wider site and that further development plots the necessary infrastructure to support them can be
	delivered."
	Alternatively:

"there may be circumstances such as where a site is allocated for development and has historic planning permissions, where the Council may use their discretion to agree a masterplan is not required." As officers know, demand for new office floorspace is limited. Demand for employment floorspace may well come from alternative employment generating uses such as healthcare, rather than E(g), B2/B8. How can a "comprehensive" masterplan, based on evidence, be prepared whilst there is a lack of clarity as to where the demand is coming from, where demand doesn't align with the Site Allocation (see representation for Policies E1 and SH4) and how occupiers would like to design and occupy space on the Site? In reality, sites will be identified and brought forward on a lot by plot basis, to meet a specific occupier's needs. Per our suggested wording above, these can be judged on their own merits, and in accordance with the development plan as a whole.

It is unreasonable to expect a landowner to invest significant time and resources into a master planning process to facilitate future development, when the type of future development is not known, and especially if this is creating a barrier to attracting inward investment on a specific plot. The now lapsed permission from 2019 at the Site is a case in point – this was speculative, didn't meet real occupier demand (it was based on theoretical demand) and was undeliverable. Policy should be amended so as to avoid these mistakes in future, and to make investing into Solent Business Park as attractive as possible.

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

This comment has been summarised – see supporting information for full response. Same comment against policy, proposed modifications and suggested wording.

Kennedy Wilson is the land owner of Solent Business Park, and previous pre-application discussions have indicated that a masterplan may be required.

Whilst we understand the underlying reason for a policy on masterplans, we do not agree that they are necessary on all major development sites, and we would like to see the policy wording amended to allow discretion that in some instances, a masterplan is not required.

We are concerned that as worded, the policy could lead to significant cost and delay to delivering development, whilst the process of agreeing a masterplan takes place, whether or not an informal masterplan or submitted as part of the application for a specific plot. At a time when it is very difficult to attract investment to sites like Solent Business Park, this cost and delay may well be off-putting for incoming occupiers. Solent Business Park has been subject to a number of outline applications over the years and is allocated for employment generating uses, thus tested and consulted upon through the plan making process. We argue that as a Site Allocation that has also been brought forward through a number of local plan reviews in the past, enough is known about the Site and how it can be developed, to exclude it from the need for another master planning exercise as described by the policy. We would be content to demonstrate broadly how a plot could be delivered without prejudicing wider development, and even to show indicatively how/where other plots, infrastructure etc could be delivered, but more than this would be unjustified. The policy should reflect there may be circumstances like at Solent Business Park where an alternative and site specific approach is needed. After the first paragraph we suggest:

"Site Allocations that have extant or historic outline planning permissions will not be required to produce a new masterplan. Development proposals will be required to demonstrate that they do not prejudice the delivery of wider site and that further development plots the necessary infrastructure to support them can be delivered."

### Alternatively:

"there may be circumstances such as where a site is allocated for development and has historic planning permissions, where the Council may use their discretion to agree a masterplan is not required." As officers know, demand for new office floorspace is limited. Demand for employment floorspace may well come from alternative employment generating uses such as healthcare, rather than E(g), B2/B8. How can a "comprehensive" masterplan, based on evidence, be prepared whilst there is a lack of clarity as to where the demand is coming from, where demand doesn't align with the Site Allocation (see representation for Policies E1 and SH4) and how occupiers would like to design and occupy space on the Site? In reality, sites will be identified and brought forward on a lot by plot basis, to meet a specific occupier's needs. Per our suggested wording above, these can be judged on their own merits, and in accordance with the development plan as a whole.

It is unreasonable to expect a landowner to invest significant time and resources into a master planning process to facilitate future development, when the type of future development is not known, and especially if this is creating a barrier to attracting inward investment on a specific plot. The now lapsed permission from 2019 at the Site is a case in point – this was speculative, didn't meet real occupier demand (it was based on theoretical demand) and was undeliverable. Policy should be amended so as to avoid these mistakes in future, and to make investing into Solent Business Park as attractive as possible.

## What is your suggested wording or text for the policy?

This comment has been summarised – see supporting information for full response. Same comment against policy, proposed modifications and suggested wording.

Kennedy Wilson is the land owner of Solent Business Park, and previous pre-application discussions have indicated that a masterplan may be required.

Whilst we understand the underlying reason for a policy on masterplans, we do not agree that they are necessary on all major development sites, and we would like to see the policy wording amended to allow discretion that in some instances, a masterplan is not required.

We are concerned that as worded, the policy could lead to significant cost and delay to delivering development, whilst the process of agreeing a masterplan takes place, whether or not an informal masterplan or submitted as part of the application for a specific plot. At a time when it is very difficult to attract investment to sites like Solent Business Park, this cost and delay may well be off-putting for incoming occupiers. Solent Business Park has been subject to a number of outline applications over the years and is allocated for employment generating uses, thus tested and consulted upon through the plan making process. We argue that as a Site Allocation that has also been brought forward through a number of local plan reviews in the past, enough is known about the Site and how it can be developed, to exclude it from the need for another

	master planning exercise as described by the policy. We would be content to demonstrate broadly how a plot could be delivered without prejudicing wider development, and even to show indicatively how/where other plots, infrastructure etc could be delivered, but more than this would be unjustified. The policy should reflect there may be circumstances like at Solent Business Park where an alternative and site specific approach is needed. After the first paragraph we suggest:  "Site Allocations that have extant or historic outline planning permissions will not be required to produce a new masterplan. Development proposals will be required to demonstrate that they do not prejudice the delivery of wider site and that further development plots the necessary infrastructure to support them can be delivered."  Alternatively:  "there may be circumstances such as where a site is allocated for development and has historic planning permissions, where the Council may use their discretion to agree a masterplan is not required."  As officers know, demand for new office floorspace is limited. Demand for employment floorspace may well come from alternative employment generating uses such as healthcare, rather than E(g), B2/B8. How can a "comprehensive" masterplan, based on evidence, be prepared whilst there is a lack of clarity as to where the demand is coming from, where demand doesn't align with the Site Allocation (see representation for Policies E1 and SH4) and how occupiers would like to design and occupy space on the Site? In reality, sites will be identified and brought forward on a lot by plot basis, to meet a specific occupier's needs. Per our suggested wording above, these can be judged on their own merits, and in accordance with the development plan as a whole.  It is unreasonable to expect a landowner to invest significant time and resources into a master planning process to facilitate future development, when the type of future development is not known, and especially if this is creating a barrier to attracting inwar
Do you agree with how the	Tatare, and to make investing into estant basiness raik as attractive as possible.
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (covering letter)
All relevant information related	Supporting information (Employment Land matters)
to the specific policy or	Supporting documents (comments on policies)
allocation has already been	
anocation has alleady been	

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

Policy/Evidence base	D5
document	
Name of respondent (or client)	Martin Miller, tor&co Ltd (Formerly Terence O'Rourke Ltd)
Personal reference number	ANON-AQTS-32UM-Z
Full reference number	ANON-AQTS-32UM-Z/7/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Paragraph 5.70 of the plan states that "the masterplan will be sought to secure agreement on key development principles when development is proposed on large sites that may be comprised of a number of different development interests and brought forward in phases". However, policy D5 uses the phrases "larger sites", "significant development" and "major landowners/users", none of which are defined in either the supporting text or the policy leaving the policy open to subjective interpretation. As it is unclear which sites would be subject to this policy, there is considerable scope for future disagreement between an applicant and the council and the policy should therefore be amended to provide clarity.  Criterion (xiv) contains a requirement for any application for significant development to assess the potential for including renewable energy schemes, which suggests that provision is not mandatory if renewable energy provision is not feasible. This criterion seems to be at odds with criterion (iv) of policy CN3 which requires onsite renewables to provide 100% of the energy consumption that is required by residential buildings, irrespective of whether it is feasible to do so or not.
What modification(s) are necessary to make the policy legally compliant or sound?	Anchor Properties consider that the scale of a 'large site' should be defined within the policy wording in order to ensure that there is clarity for both developers and the Council when bringing sites forward.  Additionally, Criterion xiv should be removed, as the requirement for all proposals to consider renewable energy generation is already covered by Policy CN3.
What is your suggested wording or text for the policy?	' In the interests of sustainable development and good quality place-making in order to secure long term benefits for the district, when proposals come forward on larger sites (5ha + ) that may be brought forward in phases the local planning authority will seek to ensure that a masterplan is developed and agreed for the site'  REMOVE: *'xiv.Assess the potential for including renewable energy schemes (Policy CN5); and:'*
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	

Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base document	D5
Name of respondent (or client)	Anna Rabone
Personal reference number	ANON-AQTS-32UK-X - Environment Agency
Full reference number	ANON-AQTS-32UK-X - Environment Agency/20/D5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Bullet point xii. omits reference to blue infrastructure which risks marginalising the water environment and opportunities not being taken to enhance water quality. The following minor modifications are suggested (i.e. addition of "and blue"):  "Incorporate a green and blue infrastructure strategy, providing an integrated network of green and blue spaces, taking advantage of opportunities for off-site links to the countryside, South Downs National Park where applicable and wider green and blue network"  Policy NE4 refers to green and blue infrastructure, so the above modification creates this consistency throughout the local plan.  We are supportive of the inclusion of bullet point xiii.
What modification(s) are necessary to make the policy legally compliant or sound?	Modifications specified above.
What is your suggested wording or text for the policy?	Bullet point xii. omits reference to blue infrastructure which risks marginalising the water environment and opportunities not being taken to enhance water quality. The following minor modifications are suggested (i.e. addition of "and blue"):  "Incorporate a green and blue infrastructure strategy, providing an integrated network of green and blue spaces, taking advantage of opportunities for off-site links to the countryside, South Downs National Park where applicable and wider green and blue network"  Policy NE4 refers to green and blue infrastructure, so the above modification creates this consistency throughout the local plan.  We are supportive of the inclusion of bullet point xiii.
Do you agree with how the	
policy will be monitored?	
If no, please explain	

Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.	No

Policy/Evidence base	D5
document	
Name of respondent (or client)	Ed Flood (Agent on behalf of Sparsholt College)
Personal reference number	ANON-AQTS-32NR-X
Full reference number	ANON-AQTS-32NR-X/10/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	The College supports the principle of using masterplans, at a proportionate level of detail, to guide large scale development. However draft Policy D5 does not provide the necessary clarity to be considered sound. The policy wording uses the phrases "larger sites", "significant development" and "major landowners/users", none of which are defined in either the supporting text or the policy itself, leaving the policy open to subjective interpretation.  Paragraph 5.70 suggests that the Masterplan should be prepared before, or in conjunction with, the submission of development proposals. This is reiterated in draft Policy D5 which seeks to ensure that the masterplan is developed and agreed for the site in advance and has involved stakeholders and interested parties. This will significantly lengthen the process for obtaining planning consent and therefore it is important the Council provides more detail on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised.  It is understood that officers will consider the requirement for a masterplan on a site by site basis but applicants require greater clarity on precisely what the thresholds are. Clearly a site wide masterplan would not be appropriate for modest additions to the classroom or teaching stock and should only be considered where comprehensive development or redevelopment is proposed.
What modification(s) are	Definitions are required for the following terms;
necessary to make the	"larger sites"
policy legally compliant or	"significant development" and
sound?	• "major landowners/users"
	Greater clarity is also required as to the circumstances at which a masterplan is required for planning
120	applications if the Plan is to be considered sound.
What is your suggested wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	

Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.	No

Policy/Evidence base	D5
document	
Name of respondent (or	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire,
client)	RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/39/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	As previously stated within our representations on the Regulation 18 Plan, Policy D5 refers to the need for masterplans to be prepared on larger sites. However, the policy and supporting text is unclear on what comprises a larger site. This must be clarified. Accordingly, the policy as currently drafted is not justified or effective.
What modification(s) are necessary to make the policy legally compliant or sound?	As previously stated within our representations on the Regulation 18 Plan, Policy D5 refers to the need for masterplans to be prepared on larger sites. However, the policy and supporting text is unclear on what comprises a larger site. This must be clarified. Accordingly, the policy as currently drafted is not justified or effective.
What is your suggested wording or text for the policy?	As previously stated within our representations on the Regulation 18 Plan, Policy D5 refers to the need for masterplans to be prepared on larger sites. However, the policy and supporting text is unclear on what comprises a larger site. This must be clarified. Accordingly, the policy as currently drafted is not justified or effective.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies, policies map and evidence base)
All relevant information related	<u>Vision document (Land At Mill Lane, Wickham)</u>
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base	D5
document	Church Commissioners for England
Name of respondent (or client)	Church Commissioners for England
Personal reference number	ANON-AQTS-32U5-8
Full reference number	ANON-AQTS-32U5-8/7/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Draft Policy D5 states that in the interests of sustainable development and good quality place-making in order to secure long term benefits for the district, when proposals come forward on larger sites that may be brought forward in phases the local planning authority will seek to ensure that the masterplan is developed and agreed for the site. Further clarity should be provided within draft Policy D5 as to how the masterplan process is to be progressed in conjunction with a site allocation. The masterplan process is not clear within the policy wording in terms of how this works as part of the planning application process or if sign off/approval is required and, if so, at what point in the process.
What modification(s) are necessary to make the policy legally compliant or sound?	We would request additional wording is included within the masterplan policy to provide certainty to applicants on this process and in particular clarification on whether Policy D5 applies to sites which are covered by a site allocation which also requires a masterplan to be produced.  We also comment on this process under draft Policy W5 below. Draft Policy D5 point viii) currently states "Include measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks;"
What is your suggested wording or text for the policy?	Given the historic network in and around Winchester, and the trend away from 'predict-and-provide' of new highway capacity provision (e.g. para 6.14.ix), we consider the following changes should be made: "Include appropriate measures to mitigate the potential traffic impacts of the proposed development on the strategic and local road networks, recognising that the most appropriate measures may be those that reduce vehicle demand in favour of active travel and/or those which prioritise more effective use of existing highway capacity."
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
Sapporting initinduction:	

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

Policy/Evidence base	D5
document	
Name of respondent (or	Bargate Homes
client)	
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/16/D5
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	No
Policy/Document comment	As highlighted in our Regulation 18 representations, a management plan is not feasible at outline/master plan
	stage but should be a requirement at reserved matters stage with the final detail to be conditioned.
What modification(s) are	Provide clarity in the policy that a management plan is not required at outline stage or will be conditioned. Or
necessary to make the	remove this requirement entirely.
policy legally compliant or	
sound?	
What is your suggested	Provide clarity in the policy that a management plan is not required at outline stage or will be conditioned. Or
wording or text for the	remove this requirement entirely.
policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D5
document	
Name of respondent (or	Tony Clements
client)	
Personal reference number	ANON-AQTS-3BX4-T
Full reference number	ANON-AQTS-3BX4-T/14/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	7.12 Strategic Policy D5 – Masterplans. Vistry and Taylor Wimpey acknowledge the purpose and value of comprehensive masterplanning and recognise that high quality placemaking is dependent on clarity and certainty in this regard. However, the policy as drafted is vague and unclear as to its purpose and operation. There is no clear definition of when a masterplan will be required, reference is made to 'large sites' in multiple land ownerships without defining qualifying criteria clearly. There is also a lack of clarity regarding when such plans would need to be provided - pre-planning application, or as part of an application, or how such plans would be agreed, or the weight they would carry.  7.13 Paragraph 5.71 refers to 'agreed plans' that will 'guidefuture development proposals', which infers there will either be a pre-application requirement that such plans will be approved so they can inform future planning applications (SPD), or that they will form part of an outline scheme and therefore guide subsequent reserved matters submissions. The policy is unclear. Paragraph 5.72 adds further to the confusion, suggesting that the need for any such plan will be decided by the local planning authority on a 'site-by-site basis', unless an allocating policy specifically requires one.  7.14 A more effective way to ensure that high quality placemaking is achieved by the Local Plan is to embark from the outset of plan-making in a truly collaborative manner by engaging positively with landowners and site promoters in identifying and developing properly considered and planned development allocations that include key principles defined within the allocating policy. Such an approach would avoid uncertainty and would ensure that key sites on which the spatial strategy of the plan relies are robust and comprehensive in their foundation. The uncertainty inherent in this policy reflects the decision to allocate sites, as core components of the development strategy, that the planning authority is unable to decisively plan for.
What modification(s) are	The policy should be made clearer as to its purpose and operation12 Strategic Policy D5 – Masterplans.
necessary to make the	Vistry and Taylor Wimpey acknowledge the purpose and value of comprehensive masterplanning and recognise that high quality placemaking is dependent on clarity and certainty in this regard. However, the

policy legally compliant or sound?	policy as drafted is vague and unclear as to its purpose and operation. There is no clear definition of when a masterplan will be required, reference is made to 'large sites' in multiple land ownerships without defining qualifying criteria clearly. There is also a lack of clarity regarding when such plans would need to be provided - pre-planning application, or as part of an application, or how such plans would be agreed, or the weight they would carry.  7.13 Paragraph 5.71 refers to 'agreed plans' that will 'guidefuture development proposals', which infers there will either be a pre-application requirement that such plans will be approved so they can inform future planning applications (SPD), or that they will form part of an outline scheme and therefore guide subsequent reserved matters submissions. The policy is unclear. Paragraph 5.72 adds further to the confusion, suggesting that the need for any such plan will be decided by the local planning authority on a 'site-by-site basis', unless an allocating policy specifically requires one.  7.14 A more effective way to ensure that high quality placemaking is achieved by the Local Plan is to embark from the outset of plan-making in a truly collaborative manner by engaging positively with landowners and site promoters in identifying and developing properly considered and planned development allocations that include key principles defined within the allocating policy. Such an approach would avoid uncertainty and would ensure that key sites on which the spatial strategy of the plan relies are robust and comprehensive in their foundation. The uncertainty inherent in this policy reflects the decision to allocate sites, as core components of the development strategy, that the planning authority is unable to decisively plan for. Policy W2 illustrates the situation; the Council is uncertain as to the capacity of the site and defers a range of issues to future masterplanning exercises, that will occur beyond the scope of the allocating policy.  7.15 The policy is uncl
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	Supporting Document (Planning for South Hampshire)
to the specific policy or	
allocation has already been	
included in the representation.	

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

Policy/Evidence base	D5
document	
Name of respondent (or	Defence Infrastructure Organisation
client)	
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/9/D5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-	Yes
operate?	
Policy/Document comment	We support the approach within Policy D5 to ensure that large scale development proposals deliver sustainable development and high-quality place making. However, we have some detailed comments on Policy D5 which are geared towards ensuring that there are no conflicts between this policy and the site-specific SJMB policy (W2).  As per our comments on Policy W2, the policy is not currently clear as to the mechanism by which this masterplan should be secured by the Local Planning Authority and we consider that wording should be added to clarify that this can be agreed through a planning application process in due course.  We request the following amended wording is introduced to Policy D5 (p99) 3rd paragraph:  "Any application for significant development on sites occupied by major landowners/users should be preceded accompanied by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development and be informed by pre-application engagement with the Local Planning Authority:"  Further to para 1.45 above, we suggest that if WCC were to clarify what it means by 'masterplanning process' as meaning the Concept Masterplan process it introduced in 2023; then a further amendment for the output (as defined in that process) and where available, should form part of the evidence base could be considered? "Any application for significant development on sites occupied by major landowners/users should be preceded accompanied by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development and be informed by pre-application engagement with the Local Planning Authority and any output of the Council's Concept Masterplanning process:"  As per our comments on the site-specific policy for Sir John Moore Barracks (Policy W2), we also consider that part xv) of this Policy D5 (p100) should be reworded to ensure it is compliant with national and local policy as follows:  xv) Demonstrate a good understanding and respect for the natura
	natural environment and heritage assets will be preserved, conserved and or enhanced. Any applications should be accompanied by a heritage statement describing the significance of affected heritage assets and/or

	their settings, the degree and nature of impact upon that significance and how the proposals minimise or
	mitigate any harm.
What modification(s) are	We support the approach within Policy D5 to ensure that large scale development proposals deliver
necessary to make the	sustainable development and high-quality place making. However, we have some detailed comments on
policy legally compliant or	Policy D5 which are geared towards ensuring that there are no conflicts between this policy and the site-
sound?	specific SJMB policy (W2).
	As per our comments on Policy W2, the policy is not currently clear as to the mechanism by which this masterplan should be secured by the Local Planning Authority and we consider that wording should be added to clarify that this can be agreed through a planning application process in due course.
	We request the following amended wording is introduced to Policy D5 (p99) 3rd paragraph:
	"Any application for significant development on sites occupied by major landowners/users should be
	preceded accompanied by, and is expected to achieve the following objectives proportionate to the scale of
	the site and proposed development and be informed by pre-application engagement with the Local Planning Authority:"
	Further to para 1.45 above, we suggest that if WCC were to clarify what it means by 'masterplanning process' as meaning the Concept Masterplan process it introduced in 2023; then a further amendment for the output
	(as defined in that process) and where available, should form part of the evidence base could be considered?
	"Any application for significant development on sites occupied by major landowners/users should be
	preceded accompanied by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development and be informed by pre-application engagement with the Local Planning Authority and any output of the Council's Concept Masterplanning process:"
	As per our comments on the site-specific policy for Sir John Moore Barracks (Policy W2), we also consider
	that part xv) of this Policy D5 (p100) should be reworded to ensure it is compliant with national and local policy as follows:
	xv) Demonstrate a good understanding and respect for the natural environment, its heritage assets and their
	setting both within the site and in the wider locality, whether designated or not, and include details of how the
	natural environment and heritage assets will be preserved, conserved and or enhanced. Any applications
	should be accompanied by a heritage statement describing the significance of affected heritage assets and/or
	their settings, the degree and nature of impact upon that significance and how the proposals minimise or
100	mitigate any harm.
What is your suggested	We support the approach within Policy D5 to ensure that large scale development proposals deliver
wording or text for the	sustainable development and high-quality place making. However, we have some detailed comments on
policy?	Policy D5 which are geared towards ensuring that there are no conflicts between this policy and the site-
	specific SJMB policy (W2).
	As per our comments on Policy W2, the policy is not currently clear as to the mechanism by which this masterplan should be secured by the Local Planning Authority and we consider that wording should be added
	to clarify that this can be agreed through a planning application process in due course.
	to darify that this can be agreed through a planning application process in due course.

	We request the following amended wording is introduced to Policy D5 (p99) 3rd paragraph: "Any application for significant development on sites occupied by major landowners/users should be
	preceded accompanied by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development and be informed by pre-application engagement with the Local Planning Authority:"
	Further to para 1.45 above, we suggest that if WCC were to clarify what it means by 'masterplanning process' as meaning the Concept Masterplan process it introduced in 2023; then a further amendment for the output (as defined in that process) and where available, should form part of the evidence base could be considered? "Any application for significant development on sites occupied by major landowners/users should be preceded accompanied by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development and be informed by pre-application engagement with the Local Planning Authority and any output of the Council's Concept Masterplanning process:"
	As per our comments on the site-specific policy for Sir John Moore Barracks (Policy W2), we also consider that part xv) of this Policy D5 (p100) should be reworded to ensure it is compliant with national and local
	policy as follows: xv) Demonstrate a good understanding and respect for the natural environment, its heritage assets and their setting both within the site and in the wider locality, whether designated or not, and include details of how the natural environment and heritage assets will be preserved, conserved and or enhanced. Any applications should be accompanied by a heritage statement describing the significance of affected heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D5
document	
Name of respondent (or	Liz Kessler
client)	LIZ NOSSICI
Personal reference number	BHLF-AQTS-32YQ-8
Full reference number	BHLF-AQTS-32YQ-8/7/D5
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Strategic Policy D5 Masterplans While welcoming this policy in principle it needs to be amended if it is to be effective. In particular with reference to sections vi. vii, and xi. If the objectives of this policy are to be realised connections beyond sites are as important, if not more important, than within sites. Reference to the 'public realm' needs to clarify that the most significant part of the public realm is the streets and crucially connections from one place to another. Looking at the major development sites in Winchester town, highlighted in sections referred to below, they all focus on a red line that omits the adjacent streets and so make the achievement of the objectives outlined with regard to the public realm, creating a street hierarchy, ensuring connectivity for pedestrians and cyclists almost impossible to achieve if only the site within the red lines are indeed considered. What is required is wider area plans, linking with the Movement Strategy; these could be concept masterplans, but must have a clear method of phasing and delivery. At the moment plans are being drawn up for 'concept masterplans' for Station Approach and Bushfield. These tick many boxes without giving confidence that a number of aspirations relating largely to the public realm, transport snd open spaces, will be delivered according to the concept plans. There is no indication of how these elements might be delivered or phased or how the process will be managed. Again a city wide Plan, as mentioned above would help.
What modification(s) are necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	

Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.	No No

Policy/Evidence base	D5
document	
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/20/D5
Legally compliant?	
Sound?	No
Complies with duty to co- operate?	
Policy/Document comment	Previous Representation made by Winchester College – Regulation 18 consultation Winchester College requests that further details are provided in the supporting text and Policy D5 to explain the process for Masterplans and how this will work in practice. It is not clear whether the City Council intends to consider the requirement for a Masterplan on a site-by-site basis and if so, what criteria would be used to determine the need and justification for the preparation of a Masterplan. Clarification is requested.  Additionally, it is not clear whether a Masterplan will be required for all significant landholdings, even those where limited new built development opportunities exist, or which will largely rely on the repurposing of existing buildings. Clarification is requested.  Paragraph 5.70 suggests that the Masterplan should be prepared before, or in conjunction with, the submission of development proposals. This is reiterated in draft Policy D5 which seeks to ensure that the masterplan is developed and agreed for the site in advance and has involved stakeholders and interested parties. This will significantly lengthen the process for obtaining planning consent and therefore it is important the Council provides more detail on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised.  WCC Officer Comments in relation to the Regulation 18 consultation  The Plan states that the LPA will consider whether the requirement for a masterplan is justified and necessary on a site by site basis unless stipulated by a site allocation in the Plan.  Since the regulation 18 plan was published for consultation, the Council has approved an Approach to Concept Masterplans, setting out the minimum the Council expects to be undertaken in the production of Concept Master Plans. No change proposed.  Representation made by Winchester College – Regulation 19 consultation  The 'Concept Masterplanning' on the Winchester City Council website and the related 'Master Planning Approach to Conc

As the Master planning Approach to Concept Masterplans is not part of the development plan or an SPD, it is not clear how this document can be used to add detail to Policy D5. Clarification is sought.

The officer's comments in relation to this policy (as set out above) identify that 'The Plan states that the LPA will consider whether the requirement for a masterplan is justified and necessary on a site by site basis unless stipulated by a site allocation in the Plan.'

Policy NE2 – Major Commercial, Education and MOD Establishments in the Countryside - requires 'Any application for development is preceded by, and is consistent with a comprehensive and evidence based site wide masterplan....' Draft Policy D5 and Policy NE2 do not make it clear what criteria would be used to determine the need and justification for the preparation of a Masterplan. Clarification is requested. Additionally, it is not clear whether a Masterplan will be required for all significant landholdings, even those where limited new built development opportunities exist, or which will largely rely on the repurposing of existing buildings. Clarification is requested.

Paragraph 5.72 of the Draft Regulation 19 Local Plan suggests that the Masterplan should be prepared before or in conjunction with the submission of development proposals. This is reiterated in draft Policy D5, which seeks to ensure that the masterplan is developed and agreed for the site in advance and input from the local planning authority and following community engagement. This will significantly lengthen the process for obtaining planning consent, and therefore it is important that the Council provides more details on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised.

Currently, as drafted, Policy D5 and point ii of Policy NE2 are not positively prepared, justified or effective as it is not clear in what circumstances the masterplan will be required and how this will be decided by the Council on site by site basis.

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

Previous Representation made by Winchester College – Regulation 18 consultation
Winchester College requests that further details are provided in the supporting text and Policy D5 to explain
the process for Masterplans and how this will work in practice. It is not clear whether the City Council intends
to consider the requirement for a Masterplan on a site-by-site basis and if so, what criteria would be used to
determine the need and justification for the preparation of a Masterplan. Clarification is requested.
Additionally, it is not clear whether a Masterplan will be required for all significant landholdings, even those
where limited new built development opportunities exist, or which will largely rely on the repurposing of
existing buildings. Clarification is requested.

Paragraph 5.70 suggests that the Masterplan should be prepared before, or in conjunction with, the submission of development proposals. This is reiterated in draft Policy D5 which seeks to ensure that the masterplan is developed and agreed for the site in advance and has involved stakeholders and interested parties. This will significantly lengthen the process for obtaining planning consent and therefore it is important the Council provides more detail on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised.

WCC Officer Comments in relation to the Regulation 18 consultation

The Plan states that the LPA will consider whether the requirement for a masterplan is justified and necessary on a site by site basis unless stipulated by a site allocation in the Plan. Since the regulation 18 plan was published for consultation, the Council has approved an Approach to Concept Masterplans, setting out the minimum the Council expects to be undertaken in the production of Concept Master Plans. No change proposed.

Representation made by Winchester College – Regulation 19 consultation

The 'Concept Masterplanning' on the Winchester City Council website and the related 'Master Planning Approach to Concept Masterplans' have been reviewed. However, the status of this document is not clear. It is not identified as a Supplementary Planning Document, which is used to add further detail to the policies in the development plan. In any instance an SPD that provides details on Policy D5 could not be adopted ahead of the Local Plan. As the Master planning Approach to Concept Masterplans is not part of the development plan or an SPD, it is not clear how this document can be used to add detail to Policy D5. Clarification is sought.

The officer's comments in relation to this policy (as set out above) identify that 'The Plan states that the LPA will consider whether the requirement for a masterplan is justified and necessary on a site by site basis unless stipulated by a site allocation in the Plan.'

Policy NE2 – Major Commercial, Education and MOD Establishments in the Countryside - requires 'Any application for development is preceded by, and is consistent with a comprehensive and evidence based site wide masterplan....' Draft Policy D5 and Policy NE2 do not make it clear what criteria would be used to determine the need and justification for the preparation of a Masterplan. Clarification is requested. Additionally, it is not clear whether a Masterplan will be required for all significant landholdings, even those where limited new built development opportunities exist, or which will largely rely on the repurposing of existing buildings. Clarification is requested.

Paragraph 5.72 of the Draft Regulation 19 Local Plan suggests that the Masterplan should be prepared before or in conjunction with the submission of development proposals. This is reiterated in draft Policy D5, which seeks to ensure that the masterplan is developed and agreed for the site in advance and input from the local planning authority and following community engagement. This will significantly lengthen the process for obtaining planning consent, and therefore it is important that the Council provides more details on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised. Currently, as drafted, Policy D5 and point ii of Policy NE2 are not positively prepared, justified or effective as it is not clear in what circumstances the masterplan will be required and how this will be decided by the Council on site by site basis.

What is your suggested wording or text for the policy?

Previous Representation made by Winchester College – Regulation 18 consultation
Winchester College requests that further details are provided in the supporting text and Policy D5 to explain the process for Masterplans and how this will work in practice.

It is not clear whether the City Council intends to consider the requirement for a Masterplan on a site-by-site basis and if so, what criteria would be used to determine the need and justification for the preparation of a Masterplan. Clarification is requested.

Additionally, it is not clear whether a Masterplan will be required for all significant landholdings, even those where limited new built development opportunities exist, or which will largely rely on the repurposing of existing buildings. Clarification is requested.

Paragraph 5.70 suggests that the Masterplan should be prepared before, or in conjunction with, the submission of development proposals. This is reiterated in draft Policy D5 which seeks to ensure that the masterplan is developed and agreed for the site in advance and has involved stakeholders and interested parties. This will significantly lengthen the process for obtaining planning consent and therefore it is important the Council provides more detail on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised.

WCC Officer Comments in relation to the Regulation 18 consultation

The Plan states that the LPA will consider whether the requirement for a masterplan is justified and necessary on a site by site basis unless stipulated by a site allocation in the Plan. Since the regulation 18 plan was published for consultation, the Council has approved an Approach to Concept Masterplans, setting out the minimum the Council expects to be undertaken in the production of Concept Master Plans. No change proposed.

Representation made by Winchester College – Regulation 19 consultation

The 'Concept Masterplanning' on the Winchester City Council website and the related 'Master Planning Approach to Concept Masterplans' have been reviewed. However, the status of this document is not clear. It is not identified as a Supplementary Planning Document, which is used to add further detail to the policies in the development plan. In any instance an SPD that provides details on Policy D5 could not be adopted ahead of the Local Plan.

As the Master planning Approach to Concept Masterplans is not part of the development plan or an SPD, it is not clear how this document can be used to add detail to Policy D5. Clarification is sought.

The officer's comments in relation to this policy (as set out above) identify that 'The Plan states that the LPA will consider whether the requirement for a masterplan is justified and necessary on a site by site basis unless stipulated by a site allocation in the Plan.'

Policy NE2 – Major Commercial, Education and MOD Establishments in the Countryside - requires 'Any application for development is preceded by, and is consistent with a comprehensive and evidence based site wide masterplan....' Draft Policy D5 and Policy NE2 do not make it clear what criteria would be used to determine the need and justification for the preparation of a Masterplan. Clarification is requested. Additionally, it is not clear whether a Masterplan will be required for all significant landholdings, even those where limited new built development opportunities exist, or which will largely rely on the repurposing of existing buildings. Clarification is requested.

	Paragraph 5.72 of the Draft Regulation 19 Local Plan suggests that the Masterplan should be prepared before or in conjunction with the submission of development proposals. This is reiterated in draft Policy D5, which seeks to ensure that the masterplan is developed and agreed for the site in advance and input from the local planning authority and following community engagement. This will significantly lengthen the process for obtaining planning consent, and therefore it is important that the Council provides more details on the process and timescales for approval of a Masterplan and the circumstances upon which it can be revised. Currently, as drafted, Policy D5 and point ii of Policy NE2 are not positively prepared, justified or effective as it is not clear in what circumstances the masterplan will be required and how this will be decided by the Council on site by site basis.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	Form (commenting on policies)
All relevant information related	Supporting information (Map - Blackbridge Yard)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

VCC Response.	
comments noted.	
VCC Recommended Changes arising from representations:	
lo changes apart from:	
roposed Modifications in response to comments from Environment Agency in relation to criterion xii in Policy D5.	

Local Plan Reference			Policy D6
or document		Previously Developed Land and	Making Best Use of Land
Total Number of Representations received			18
Number of respondents who confirmed they co	nsider the policy is –	Yes	No
Legally Compliant		11	3
Sound		4	14
Complies with Duty to Cooperate		13	0

#### **Summary of Representations**

A number of respondents refer to the lack of clarity as the policy only refers to sites within settlements rather than those in the countryside which are in sustainable and accessible locations, which could make a valuable contribution to development needs and reducing carbon footprint without detriment to landscape quality and biodiversity.

Concern there is an over reliance/favour for brownfield sites in terms of restricting the delivery of greenfield sites which runs contrary to the requirements of NPPF, potentially affecting housing delivery, including affordable housing. There is also reference questioning how the Council intends to prioritise previously developed land (PDL) through the decision-making process.

A representation refers to the historic under delivery of brownfield sites (Central Winchester and Station Approach) so these should not be relied upon for housing delivery including affordable housing.

There are calls for a more balanced approach, acknowledging both brownfield and greenfield opportunities to meet housing needs efficiently, in recognition that brownfield sites often face viability challenges.

**Representation Numbers** (Statutory consultees in bold and named)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/10/D6

ANON-AQTS-3BSY-T/16/D6

ANON-AQTS-32CD-5 - Colden Common Parish Council/10/D6

ANON-AQTS-32GC-8/3/D6

ANON-AQTS-32GG-C/2/D6

ANON-AQTS-3298-F/2/D6

ANON-AQTS-32NS-Y/2/D6

ANON-AQTS-32NR-X/3/D6

ANON-AQTS-329Q-8/7/D6

ANON-AQTS-3BQA-Z/2/D6

ANON-AQTS-3BBP-Z/2/D6

ANON-AQTS-327B-Q/2/D6

ANON-AQTS-32MQ-V/1/D6

BHLF-AQTS-32EE-8/1/D6

BHLF-AQTS-326E-S/2/D6

BHLF-AQTS-32YH-Y - Network Rail/1/D6

BHLF-AQTS-328S-9/2/D6

BHLF-AQTS-328K-1/4/D6

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

- Need to clarify the position with brownfield sites outside of settlement boundaries but in sustainable accessible locations.
- Concern about reliance on brownfield sites for housing delivery given lack of progress with sites in Winchester (Station Approach, Central Winchester).
- Need to determine compliance with NPPF in terms of prioritising previously developed land (PDL) through the decision-making process.

Policy/Evidence base	D6	
document		
Name of respondent (or client)	Lisa Fielding	
Personal reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council	
Full reference number	ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/10/D6	
Legally compliant?	Yes	
Sound?	No	
Complies with duty to co- operate?	Yes	
Policy/Document comment	1. The use of brownfield land to meet the needs of the district has the potential to make a greater contribution to reducing the carbon footprint of the district than greenfield sites. However, they can present a number of challenges to their re-use which requires clear guidance on how the local plan policies would be applied. The policy only refers to sites within settlements and makes no reference to sites in the countryside.  2. The policy seeks to optimise the development potential of brownfield sites and to deliver higher densities. It recognises that there will be other considerations such as the need to create high quality places. The supporting text, ref paragraph 5.73 does reference the character of the site and wider area but does not include other key factors such as landscape and biodiversity. The Parish Council objects to the policy. Object to Policy D6. It does not extend to brownfield sites in the countryside. It should be amended to include other key considerations to the development of brownfield land such as landscape quality and biodiversity.	
What modification(s) are necessary to make the policy legally compliant or sound?	Add consideration for brownfield sites in the countryside, and landscape quality and biodiversity.	
What is your suggested wording or text for the policy?	<ul> <li>a. Amend the Policy, in the first paragraph delete the reference to existing settlements</li> <li>b. Amend the Policy in the last sentence of the first paragraph, after well designed places add'</li> <li>consistent with the other policies of the plan'</li> <li>c. Amend the Policy, in the second paragraph, after general character add 'landscape quality and biodiversity'</li> </ul>	
Do you agree with how the policy will be monitored?		
If no, please explain		
Do you want to participate in		
hearing sessions for this policy?		
Have you submitted	Yes	
supporting information?	Letter (commenting on policies)	

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

Policy/Evidence base	D6
document	
Name of respondent (or	Rob Edgecock
client)	ANON ACTO OBOVET
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/16/D6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	It is very important to avoid the development of green land in any category, so the definition of what is brownfield is important. Some land which has previously been developed (e.g. gold courses) should not be counted as brownfield.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/10/D6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	Mandy Owan (Payer) on habelf of Vietry Partnershing
Name of respondent (or client)	Mandy Owen (Boyer) on behalf of Vistry Partnerships
Personal reference number	ANON-AQTS-32GC-8
Full reference number	ANON-AQTS-32GC-8/3/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	As set out further in our representation on Policy H2, the proposal to artificially restrict the delivery of greenfield sites (in favour of brownfield redevelopment) runs contrary to the requirements of NPPF Paragraph 60. This states that; "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".  The approach is inconsistent with national planning policies and not positively prepared.
What modification(s) are necessary to make the policy legally compliant or sound?	The reference to 'prioritising' the development of brownfield sites should be omitted from the policy wording.
What is your suggested wording or text for the policy?	The reference to 'prioritising' the development of brownfield sites should be omitted from the policy wording.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies and evidence base - includes tables)
All relevant information related	Supporting document 1 (Affordable Housing Statement)
to the specific policy or	Supporting document 2 (Vision Document 1 - Pitt Vale)
allocation has already been	Supporting document 3 (Vision Document 2)
included in the representation.	Supporting document 4 (Landscape and Visual Technical Note)

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

Supporting document 5 (Biodiversity Net Gain Feasibility Report)

Policy/Evidence base	D6
document	
Name of respondent (or	Mark Behrendt
client)	
Personal reference number	ANON-AQTS-32GG-C
Full reference number	ANON-AQTS-32GG-C/2/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	37. HBF is not clear as to how the Council intends to prioritise previously developed land (PDL) through the decision-making process. The prioritisation given to PDL is through the plan making process and where green field sites are required to meet housing needs and there is a risk that the Council could refuse green field developments just because there are developable PDL sites in the Borough that are still to come forward. HBF would therefore suggest that the phrase "the local planning authority will prioritise development of previously developed land" is deleted from the policy. If that is not the intention of this policy, then more clarity is required.
What modification(s) are	oranity is required.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form (copy of form - refers to letter)
All relevant information related	Letter (Commenting on policies and evidence base)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	

1	may contain additional details,
۶	such as images, tables, or
t	tracked changes, if applicable.

Policy/Evidence base	D6
document	
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/2/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Whilst recognising that the changes to the NPPF published in June 2024 are in draft, and transitional arrangements also exist for the purposes of plan making, the further emphasis on the re-use of brownfield land is not contentious and is likely to be a focus in the NPPF and government policy moving forward. These changes should be reflected within Policy D6 to optimise the opportunities to make the best use of this land. In addition to giving substantial weight to re-using suitable brownfield land, new paragraph 122 (c) within the NPPF sets out that such proposals should be regarded as acceptable in principle and in order to be consistent with national policy and positively prepared. This should be added to the policy.
What modification(s) are necessary to make the policy legally compliant or sound?	Add an additional paragraph to Policy D6 recognising the existing substantial weight afforded to the re-use of brownfield land at paragraph 122 of the NPPF and further text to reflect the proposed change at proposed paragraph 122(c) that the redevelopment of suitable brownfield land should be regarded as acceptable in principle.
What is your suggested wording or text for the policy?	Additional Paragraph to be added to the end of Policy D6 as follows:  Proposals for the redevelopment or change of use of suitable brownfield land within settlements for homes and other identified needs should be given substantial weight and should be regarded as acceptable in principle.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	

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

Policy/Evidence base	D6
document	
Name of respondent (or client)	Catesby Estates
Personal reference number	ANON-AQTS-32NS-Y
Full reference number	ANON-AQTS-32NS-Y/2/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	As set out further in our representation on Policy H2, the proposal to artificially restrict the delivery of greenfield sites (in favour of brownfield redevelopment) runs contrary to the requirements of NPPF Paragraph 60. This states that; "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".  The approach in Policy D6 is inconsistent with national planning policies, is unjustified, and not positively prepared.
What modification(s) are necessary to make the policy legally compliant or sound?	The reference to 'prioritising' the development of brownfield sites should be omitted from the policy wording.
What is your suggested wording or text for the policy?	The reference to 'prioritising' the development of brownfield sites should be omitted from the policy wording.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham)
All relevant information related	Supporting document 2 (Vision Framework)
to the specific policy or	Supporting document 3 (Concept Plan)
allocation has already been	Supporting document 4 (Integrated Impact Assessment comments)

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

Policy/Evidence base	D6
document	
Name of respondent (or client)	Ed Flood (Agent on behalf of Sparsholt College)
Personal reference number	ANON-AQTS-32NR-X
Full reference number	ANON-AQTS-32NR-X/3/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	The College supports the prioritisation of brownfield or previously developed land set out in draft policy D6. However, it is considered that the reference to "within existing settlements" could be interpreted as being informed by defined settlement boundaries. This being the case, it will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended.  Acknowledging that policies elsewhere within the draft plan are not solely focussed on land within settlement boundaries (Policies SP3 & NE2 for example), clarity is required so that sites outside of urban areas which are accessible and suitable for redevelopment benefit from the 'brownfield first' approach.
What modification(s) are	Remove reference to 'within existing settlements'. Sparsholt College does not lie within a defined settlement
necessary to make the	boundary but draft policy NE2 expresses clear support for the retention and development of major
policy legally compliant or	educational establishments in rural locations where this helps them to continue to contribute to the District's
sound?	economic prosperity. Policies D6 and NE2 appear to conflict with one and other.
What is your suggested wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	

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

Policy/Evidence base	D6
document	
Name of respondent (or	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire,
client)	RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/7/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	As previously stated within our representations on the Regulation 18 Plan, whilst prioritising brownfield sites is compliant with the approach set out in the NPPF, it should be recognised that a number of Winchester City's brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 - Central Winchester Regeneration is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review. It has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing Local Plan allocation (WIN7) that has been carried forward.  In bringing forward brownfield sites, it is advisable to apply a non-implementation rate due to the complexities surrounding such sites, and the evidence on non-delivery or alternatively provide additional allocated sites, such as at Wickham, which can provide additional housing to that proposed,, in order to ensure that housing targets are met in the event that there are problems with the delivery of brownfield sites.  There is an over reliance on brownfield sites some which have not been delivered which has the potential to affect the deliverability and therefore the effectiveness of the Local Plan. Should these sites not come forward as expected this would result in part of the buffer being used up.  Furthermore, brownfield sites are not expected to deliver the same level of affordable housing as greenfield. Draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02) has the ability to deliver up to 16 affordable units (40% of the site) with the potential to deliver further affordable housing if this site was expanded to include Land at the junction of Mill Lane, Wickham (WI06). This would increase the total number of houses delivered on the site from 40 to around 100 and significantly elevate the number of affordable housing that gre
What modification(s) are necessary to make the	As previously stated within our representations on the Regulation 18 Plan, whilst prioritising brownfield sites is compliant with the approach set out in the NPPF, it should be recognised that a number of Winchester

### policy legally compliant or sound?

City's brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 - Central Winchester Regeneration is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review. It has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing Local Plan allocation (WIN7) that has been carried forward.

In bringing forward brownfield sites, it is advisable to apply a non-implementation rate due to the complexities surrounding such sites, and the evidence on non-delivery or alternatively provide additional allocated sites, such as at Wickham, which can provide additional housing to that proposed,, in order to ensure that housing targets are met in the event that there are problems with the delivery of brownfield sites.

There is an over reliance on brownfield sites some which have not been delivered which has the potential to affect the deliverability and therefore the effectiveness of the Local Plan. Should these sites not come forward as expected this would result in part of the buffer being used up.

Furthermore, brownfield sites are not expected to deliver the same level of affordable housing as greenfield. Draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02) has the ability to deliver up to 16 affordable units (40% of the site) with the potential to deliver further affordable housing if this site was expanded to include Land at the junction of Mill Lane, Wickham (WI06). This would increase the total number of houses delivered on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to around 40 on the site.

Given the local plan's priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites which are not going to deliver the quantum of affordable housing that greenfield sites are expected to and consequently the strategy needs to be altered to provide a better balance between greenfield and brownfield.

## What is your suggested wording or text for the policy?

As previously stated within our representations on the Regulation 18 Plan, whilst prioritising brownfield sites is compliant with the approach set out in the NPPF, it should be recognised that a number of Winchester City's brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 - Central Winchester Regeneration is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review. It has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing Local Plan allocation (WIN7) that has been carried forward.

In bringing forward brownfield sites, it is advisable to apply a non-implementation rate due to the complexities surrounding such sites, and the evidence on non-delivery or alternatively provide additional allocated sites, such as at Wickham, which can provide additional housing to that proposed,, in order to ensure that housing targets are met in the event that there are problems with the delivery of brownfield sites.

Do you agree with how the policy will be monitored?  If no, please explain	There is an over reliance on brownfield sites some which have not been delivered which has the potential to affect the deliverability and therefore the effectiveness of the Local Plan. Should these sites not come forward as expected this would result in part of the buffer being used up.  Furthermore, brownfield sites are not expected to deliver the same level of affordable housing as greenfield. Draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02) has the ability to deliver up to 16 affordable units (40% of the site) with the potential to deliver further affordable housing if this site was expanded to include Land at the junction of Mill Lane, Wickham (WI06). This would increase the total number of houses delivered on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to around 40 on the site.  Given the local plan's priority to deliver affordable housing, there is a disconnect between the reliance placed on brownfield sites which are not going to deliver the quantum of affordable housing that greenfield sites are expected to and consequently the strategy needs to be altered to provide a better balance between greenfield and brownfield.
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information?	Yes Letter (commenting on policies, policies map and evidence base)
All relevant information related	Vision document (Land At Mill Lane, Wickham)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details, such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	
Name of respondent (or	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
client)	
Personal reference number	ANON-AQTS-3BQA-Z
Full reference number	ANON-AQTS-3BQA-Z/2/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.  The R19 LP sets out that WCC will ensure that a site's development potential is maximised, and higher densities will be encouraged on sites which have good access to facilities, services and public transport whilst ensuring development responds positively to its setting (paragraph 5.73). Bloor is in support of the recognition of benefits which can occur from locating housing in the right place to ensure the most efficient use of land and local service provision by locating new housing where it will be in proximity to essential services, facilities and infrastructure, helping to achieve a sustainable pattern of development and carbon neutrality by 2030.  The R19 LP as such has been developed with a brownfield first approach (policy D6). Bloor supports and does not dispute the importance or principle of utilising brownfield sites. However, Bloor does raise concerns later within this representation regarding the fact that the WCC intends to restrict the release of new greenfield sites until 2030, under Strategic Policy H2 (housing phasing and supply), due to the finite source of brownfield land, the often-harder viability challenges resulting in reduced affordable housing provision and the strong message from Central Government to increase delivery. Some of these concerns were echoed by Councillors at both the Urgent Cabinet and Urgent Council meetings in August 2024.  In addition to the above, there has been a historic under-delivery of allocated brownfield sites, such as the Central Winchester Regeneration Area and Station Approach Regeneration Area which have a combined capacity of 550 dwellings. These have been carried forward from the previous Local Plan, and neither are subject to a submitted planning application which indicates there is unlikely to be progress made towards their delivery at the early stage of the draft Local Plan period. Bloor therefore object
What modification(s) are	PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION
necessary to make the	19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.

## policy legally compliant or sound?

The R19 LP sets out that WCC will ensure that a site's development potential is maximised, and higher densities will be encouraged on sites which have good access to facilities, services and public transport whilst ensuring development responds positively to its setting (paragraph 5.73). Bloor is in support of the recognition of benefits which can occur from locating housing in the right place to ensure the most efficient use of land and local service provision by locating new housing where it will be in proximity to essential services, facilities and infrastructure, helping to achieve a sustainable pattern of development and carbon neutrality by 2030.

The R19 LP as such has been developed with a brownfield first approach (policy D6). Bloor supports and does not dispute the importance or principle of utilising brownfield sites. However, Bloor does raise concerns later within this representation regarding the fact that the WCC intends to restrict the release of new greenfield sites until 2030, under Strategic Policy H2 (housing phasing and supply), due to the finite source of brownfield land, the often-harder viability challenges resulting in reduced affordable housing provision and the strong message from Central Government to increase delivery. Some of these concerns were echoed by Councillors at both the Urgent Cabinet and Urgent Council meetings in August 2024.

In addition to the above, there has been a historic under-delivery of allocated brownfield sites, such as the Central Winchester Regeneration Area and Station Approach Regeneration Area which have a combined capacity of 550 dwellings. These have been carried forward from the previous Local Plan, and neither are subject to a submitted planning application which indicates there is unlikely to be progress made towards their delivery at the early stage of the draft Local Plan period. Bloor therefore object to Policy D6 and Strategic Policy H2 on the grounds that they would restrict housing delivery, particularly affordable housing delivery (as Policy H6 requires a reduced provision on brownfield sites) in the height of the housing crisis. Issues of affordable housing delivery on brownfield sites is explored in greater detail at Section 3.

# What is your suggested wording or text for the policy?

PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.

The R19 LP sets out that WCC will ensure that a site's development potential is maximised, and higher densities will be encouraged on sites which have good access to facilities, services and public transport whilst ensuring development responds positively to its setting (paragraph 5.73). Bloor is in support of the recognition of benefits which can occur from locating housing in the right place to ensure the most efficient use of land and local service provision by locating new housing where it will be in proximity to essential services, facilities and infrastructure, helping to achieve a sustainable pattern of development and carbon neutrality by 2030.

The R19 LP as such has been developed with a brownfield first approach (policy D6). Bloor supports and does not dispute the importance or principle of utilising brownfield sites. However, Bloor does raise concerns later within this representation regarding the fact that the WCC intends to restrict the release of new greenfield sites until 2030, under Strategic Policy H2 (housing phasing and supply), due to the finite source of brownfield land, the often-harder viability challenges resulting in reduced affordable housing provision and the

	strong message from Central Government to increase delivery. Some of these concerns were echoed by Councillors at both the Urgent Cabinet and Urgent Council meetings in August 2024.  In addition to the above, there has been a historic under-delivery of allocated brownfield sites, such as the Central Winchester Regeneration Area and Station Approach Regeneration Area which have a combined capacity of 550 dwellings. These have been carried forward from the previous Local Plan, and neither are subject to a submitted planning application which indicates there is unlikely to be progress made towards their delivery at the early stage of the draft Local Plan period. Bloor therefore object to Policy D6 and Strategic Policy H2 on the grounds that they would restrict housing delivery, particularly affordable housing delivery (as Policy H6 requires a reduced provision on brownfield sites) in the height of the housing crisis. Issues of affordable housing delivery on brownfield sites is explored in greater detail at Section 3.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on Policies &amp; Evidence Base)</u>
All relevant information related	Supporting document 1 (South Winchester Vision Document)
to the specific policy or	Supporting document 2 (Response to the delivery of housing)
allocation has already been	Supporting document 3 (Technical Note 1 - Sustainability & Transport)
included in the representation.	Supporting document 4 (Technical Note 2 - Transport Feasibility Report)
However, the links provided	Supporting document 5 (Statement of Common Ground between Bloor Homes & Stagecoach (South) Ltd)
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	Andrew Herina
Name of respondent (or client)	Andrew Uwins
Personal reference number	ANON-AQTS-3BBP-Z
Full reference number	ANON-AQTS-3BBP-Z/2/D6
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Hazeley raises concerns regarding the fact that the WCC intends to restrict the release of new greenfield sites until 2030, under Strategic Policy H2 (housing phasing and supply), due to the finite source of brownfield land, the often-harder viability challenges resulting in reduced affordable housing provision and the strong message from Central Government to increase delivery.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies - includes pictures)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base document	D6
	Alice Lack
Name of respondent (or	Alice Lack
client) Personal reference number	ANON-AQTS-327B-Q
Full reference number	ANON-AQTS-327B-Q ANON-AQTS-327B-Q/2/D6
	No
Legally compliant? Sound?	No
	Yes
Complies with duty to co- operate?	
Policy/Document comment	Welbeck raise concerns with policy D6 and Policy H2 on the grounds that they would restrict housing delivery, particularly affordable housing delivery (as Policy H6 requires a reduced provision on brownfield sites) in the height of the housing crisis.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on Policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	
Name of respondent (or client)	Union4 Planning Ltd
Personal reference number	ANON-AQTS-32MQ-V
Full reference number	ANON-AQTS-32MQ-V/1/D6
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	While we support the intention of Policy D6 which seeks to prioritise the redevelopment of previously developed, brownfield land, we would raise concern that the policy as currently drafted may not be effective and is inconsistent with national planning policy and is hence unsound. While the thrust of the policy is supported, in the final sentence the policy seems to restrict the optimal use of brownfield land in the urban area to match the characteristics (including potentially the density) of the surrounding land. This is inconsistent with an approach that seeks to increase densities to accommodate the development needs of the area and is likely to consequently increase the need for previously undeveloped land. The policy ought to maximise the use of land as a valuable resource by prioritising the development of brownfield land, making best and most efficient use of available land, as set out in the LP Vision. We would suggest that to clarify the approach, the phrase 'The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.' Should be deleted.
What modification(s) are necessary to make the policy legally compliant or sound?	We would suggest that to clarify the approach, the phrase 'The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.' Should be deleted.
What is your suggested wording or text for the policy?	We would suggest that to clarify the approach, the phrase 'The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.' Should be deleted.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>

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

Policy/Evidence base	D6
document	
Name of respondent (or	Footstep Active Living Ltd
client)	
Personal reference number	BHLF-AQTS-32EE-8
Full reference number	BHLF-AQTS-32EE-8/1/D6
Legally compliant?	
Sound?	No
Complies with duty to co- operate?	
What modification(s) are	We support the approach in draft policy D6 to ensure that development land is used most effectively by prioritising the development of brownfield land. However, it is considered that the reference to "within existing settlements" could be interpreted as being informed by defined settlement boundaries. This being the case, it will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended.  Paragraph 1.2 (bullet 3) of the Local Plan Foreward states that this Local Plan seeks to protect our natural environment by adopting a 'brownfield first' approach to development opportunities. This is supported.  However, failing to recognise the suitability of all brownfield sites in accessible locations undermines this 'brownfield first' approach. Brownfield sites which are currently located outside the defined settlement policy boundary, may nevertheless still be in accessible locations, close to local facilities and services. Therefore, recognising the potential for all brownfield sites in accessible locations could make a valuable contribution towards a more efficient use of land and buildings, will contribute to the preservation of our natural environment, and will reduce the reliance of greenfield sites for development.  The question of what is meant by 'existing settlements' needs to be addressed/clarified.  The Local Plan acknowledges that some communities don't have a defined settlement policy boundary, and yet are referred to in the Local Plan as 'settlements' needs to be addressed/clarified.  The policy D6 adds that higher densities will be expected on sites which have good access to facilities and public transport "particularly in urban areas". This emphasis suggests that the local planning authority acknowledges that relevant policies are not focussed on land within settlement boundaries only and that there may also be sites outside urban areas which are accessible and suitable for redevelopment by following the 'b
What modification(s) are	
necessary to make the	those which fall outside settlement boundaries – or intentionally seeks to refer to land within defined
policy legally compliant or sound?	boundaries only.
Souliu :	

What is your suggested	It is suggested that "within existing settlements" should be deleted from Policy D6 (and supporting text) or
wording or text for the	amended to add "within or adjoining existing settlements".
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Supporting document 1 (Location Plan)
All relevant information related	Supporting document 2 (form commenting on H3)
to the specific policy or	Supporting document 3 (Form commenting on D6)
allocation has already been	Supporting document 4 (Form commenting on H4)
included in the representation.	Supporting document 5 (Form commenting on NE7)
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	
Name of respondent (or	Heritage Property Southern Limited
client)	
Personal reference number	BHLF-AQTS-326E-S
Full reference number	BHLF-AQTS-326E-S/2/D6
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	
Policy/Document comment	Policy D6: Brownfield Development and Making Best Use of Land.  Similarly to above, the text of Policy D6 seeks to constrain the reuse of previously developed land in a way that is contrary to paragraph 89 of the NPPF and is therefore unsound.  The policy can be made sound by omitting the words "within existing settlements" so that first sentence of the revised policy reads "In order to ensure that development land is used most effectively, the local planning authority will prioritise development of previously developed land, and expect higher densities where appropriate on sites which have good access to facilities and public transport, particularly within the urban areas.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	Form and supporting information (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	

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

Policy/Evidence base	D6
document	
Name of respondent (or	Craig Hatton
client)	
Personal reference number	BHLF-AQTS-32YH-Y - Network Rail
Full reference number	BHLF-AQTS-32YH-Y - Network Rail/1/D6
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	Full response on website.
	Network Rail believes that Policy to be sound and is supportive of maximising densities on
What modification(s) are	brownfield sites close to public transport.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	
Name of respondent (or	The Hospital of St Cross & Almshouse of Noble Poverty
client)	
Personal reference number	BHLF-AQTS-328S-9
Full reference number	BHLF-AQTS-328S-9/2/D6
Legally compliant?	
Sound?	No
Complies with duty to co- operate?	
What modification(s) are	We support the approach in draft policy D6 to ensure that development land is used most effectively by prioritising the development of brownfield land. However, it is considered that the reference to "within existing settlements" could be interpreted as being informed by defined settlement boundaries. This being the case, it will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended.  Paragraph 1.2 (bullet 3) of the Local Plan Foreward states that this Local Plan seeks to protect our natural environment by adopting a 'brownfield first' approach to development opportunities. This is supported. However, failing to recognise the suitability of all brownfield sites in accessible locations undermines this 'brownfield first' approach. Brownfield sites which are currently located outside the defined settlement policy boundary, may nevertheless still be in accessible locations, close to local facilities and services. Therefore, recognising the potential for all brownfield sites in accessible locations could make a valuable contribution towards a more efficient use of land and buildings, will contribute to the preservation of our natural environment, and will reduce the reliance of greenfield sites for development.  The question of what is meant by 'existing settlements' needs to be addressed/clarified.  The Local Plan acknowledges that some communities don't have a defined settlement policy boundary, and yet are referred to in the Local Plan as 'settlements'.  Draft policy D6 adds that higher densities will be expected on sites which have good access to facilities and public transport "particularly in urban areas". This emphasis suggests that the local planning authority acknowledges that relevant policies are not focussed on land within settlement boundaries only and that there may also be sites outside urban areas which are accessible and suitable for redevelopment by following the 'brownfield first' approach. Clar
What modification(s) are	It should be clarified whether "within existing settlements" points generally to 'built up/urban areas' – including
necessary to make the	those which fall outside settlement boundaries – or intentionally seeks to refer to land within defined
policy legally compliant or sound?	boundaries only.

What is your suggested	It is suggested that "within existing settlements" should be deleted from Policy D6 (and supporting text) or
wording or text for the	amended to add "within or adjoining existing settlements".
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Form 1 (D6)
All relevant information related	Form 2 (Commenting on settlement boundary - Winchester Town)
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D6
document	
Name of respondent (or	Winchester College
client)	
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/4/D6
Legally compliant?	
Sound?	Yes
Complies with duty to co- operate?	
Policy/Document comment	Previous Representation made by Winchester College – Regulation 18 consultation Winchester College support the principle of the City Council's approach to making the best use of brownfield land in Policy D6. However, for clarification, the College requests that the wording of the policy is amended to take account of the fact that higher densities may not be appropriate for all development proposals, for instance where heritage assets may be affected.  The College therefore requests that the policy is amended as follows (suggested additional text is underlined): "In order to ensure that development land within existing settlements is used most effectively, and expect higher densities, where appropriate on sites which have good access well designed places."  WCC Officer Comments in relation to the Regulation 18 consultation Agree amendment.  Proposed change. Amend first sentence of policy D6 - "and expect higher densities where appropriate on sites".  Winchester College supports the amendments to Policy D6.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	

Do you want to participate in hearing sessions for this	
Have you submitted supporting information? All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,	Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)
such as images, tables, or tracked changes, if applicable.	

WCC Response.	
Comments noted.	
WCC Recommended Changes arising from representations:	
None.	

Local Plan Reference			Policy D7
or document		Γ	Development Standards
Total Number of Representations received		4	
Number of respondents who confirmed they consider the policy is –		Yes	No
Legally Compliant		3	0
Sound		2	1
Complies with Duty to Cooperate		3	0

There is general support to development standards to minimise impact on the environment and the countryside.

A respondent considers that the Policy is unnecessary as it requires compliance with existing statutory standards for environmental quality and proposals are required to be accompanied by a statement setting out how such requirements have been met in designing the proposal, whereas another supports the requirements of the policy.

**Representation Numbers** (Statutory consultees in bold and named)

ANON-AQTS-3BSY-T/10/D7

ANON-AQTS-32CD-5 - Colden Common Parish Council/7/D7

ANON-AQTS-329Q-8/3/D7

BHLF-AQTS-328Q-7/3/D7

Main issues raised in representations received in regulation 19 consultation

• Question the need for the policy given it reflects published statutory standards.

Policy/Evidence base	D7
document	
Name of respondent (or	Rob Edgecock
client)	
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/10/D7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	It is important to raise development standards to minimise impact on the environment and the countryside.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D7
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/7/D7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	No
Have you submitted supporting information?	INO INO
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D7
document	
Name of respondent (or	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire,
client)	RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/3/D7
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	Policy D7 as currently drafted requires that proposals comply with all national statutory standards related to environmental quality and proposals are accompanied by a statement setting out how such requirements have been met in designing the proposal. As stated in our Regulation 18 representation, this requirement is considered unnecessary and inappropriate in planning terms and is not justified.
What modification(s) are	Policy D7 as currently drafted requires that proposals comply with all national statutory standards related to
necessary to make the	environmental quality and proposals are accompanied by a statement setting out how such requirements
policy legally compliant or	have been met in designing the proposal. As stated in our Regulation 18 representation, this requirement is
sound?	considered unnecessary and inappropriate in planning terms and is not justified.
What is your suggested	Policy D7 as currently drafted requires that proposals comply with all national statutory standards related to
wording or text for the	environmental quality and proposals are accompanied by a statement setting out how such requirements
policy?	have been met in designing the proposal. As stated in our Regulation 18 representation, this requirement is considered unnecessary and inappropriate in planning terms and is not justified.
Do you agree with how the	, ii i j
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies, policies map and evidence base)
All relevant information related	<u>Vision document (Land At Mill Lane, Wickham)</u>
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base	D7
document	
Name of respondent (or	Georgina Cox
client)	
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/3/D7
Legally compliant?	
Sound?	
Complies with duty to co- operate?	
Policy/Document comment	Gladman support the requirements for all developments to comply with national statutory standards relating to environmental quality and the submission of a statement showing how requirements have been met in the design of the development site.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	V <sub>2</sub> -
Have you submitted	Yes
supporting information?	Form (refers to letter)
All relevant information related	Supporting information (commenting on policies and proposed site)
to the specific policy or	
allocation has already been included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	
Hacked Changes, II applicable.	

WCC Response.
Comments noted.
WCC Recommended Changes arising from representations:
None.

Local Plan Reference			Policy D8
or document			Contaminated Land
Total Number of Representations received		5	
Number of respondents who confirmed they consider the policy is –		Yes	No
Legally Compliant		4	1
Sound		3	2
Complies with Duty to Cooperate		4	1

Support for contaminated land to be de-contaminated, so that it can be used for development. This should have priority over developing greenfield sites. However, other representations refer to the fact that remediation of land can add significant costs to a development and that this needs to be consider whether other development benefits are requested such as affordable housing and other community gains – this matter should be reflected in the policy.

Request that the policy clarifies that site investigations and risk assessments can be secured as part of planning conditions, to ensure there will be no unacceptable impacts on human health or the wider environment.

Agree with ground and surface water pollution being referred to separately in the policy.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BSY-T/38/D8

ANON-AQTS-32CD-5 - Colden Common Parish Council/23/D8

ANON-AQTS-32UK-X - Environment Agency/9/D8

ANON-AQTS-32G7-V/7/D8

ANON-AQTS-32SB-K - Defence Infrastructure Organisation/7/D8

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

- Need to consider remediation costs vis a vis other benefits being sought as part of a proposal to ensure a site is not deemed unviable; and
- Consider referring to using planning conditions to secure site investigations, risk management and remediation measures on sites.

Policy/Evidence base	D8
document	
Name of respondent (or	Rob Edgecock
client)	
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/38/D8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	Contaminated land should be de-contaminated, so that it can be used for development. This should have priority over developing greenfield sites.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	No
Have you submitted supporting information?	INO INO
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D8
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/23/D8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy? Have you submitted	No
supporting information?	110
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D8
document	
Name of respondent (or	Anna Rabone
client)	
Personal reference number	ANON-AQTS-32UK-X - Environment Agency
Full reference number	ANON-AQTS-32UK-X - Environment Agency/9/D8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co- operate?	Yes
Policy/Document comment	We note that our comments at the Regulation 18 consultation have been taken on board and the policy now
	separates ground and surface water pollution.
What modification(s) are	No modifications are necessary.
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D8
document	
Name of respondent (or	Bargate Homes
client)	
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/7/D8
Legally compliant?	No
Sound?	No
Complies with duty to co-	No
operate?	
Policy/Document comment	Bargate Homes consider that the Local Plan should recognise that remediation of contaminated land can add significant costs to a development, and because the removal of contamination is an environmental benefit in its own right, it would be appropriate to acknowledge that the Council will take these costs and benefits into account when determining the appropriate level of other benefits such as affordable housing and other community gains.
What modification(s) are	Additional text should be included either in the policy or supporting paragraphs to acknowledge the
necessary to make the	environmental benefits of remediating contaminated land in its own right is a significant benefit.
policy legally compliant or	
sound?	
What is your suggested	Additional text should be included either in the policy or supporting paragraphs to acknowledge the
wording or text for the policy?	environmental benefits of remediating contaminated land in its own right is a significant benefit.
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	

Policy/Evidence base	D8
document	
Name of respondent (or	Defence Infrastructure Organisation
client)	
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/7/D8
Legally compliant?	Yes
Sound?	No
Complies with duty to co- operate?	Yes
Policy/Document comment	We support the approach within Policy D8 to ensure that development which is known or suspected to be contaminated will only be permitted where there will be no unacceptable impacts on human health or the wider environment. However, we request that Policy D8 should be reworded to clarify that site investigations and risk assessments can be secured as part of planning conditions. In our view, this is a standard approach and conditions can also secure remediation of any unexpected contamination which may be found.
What modification(s) are	We request the following amendment should be made to the policy D8 part iii (P.106):
necessary to make the	"iii. All site investigations, risk assessment, remediation and associated works are undertaken in line with
policy legally compliant or	current government guidance and industry best practice guidelines. All assessments must accompany
sound?	planning applications or be secured by planning condition and where further assessments are required they will be secured by planning condition."
What is your suggested	We request the following amendment should be made to the policy D8 part iii (P.106):
wording or text for the	"iii. All site investigations, risk assessment, remediation and associated works are undertaken in line with
policy?	current government guidance and industry best practice guidelines. All assessments must accompany
	planning applications or be secured by planning condition and where further assessments are required they
	will be secured by planning condition."
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	

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

WCC Response.	
Comments noted.	
WCC Recommended Changes arising from representations:	
None.	

Local Plan Reference		Policy D9
or document		Shopfronts
Total Number of Representations received		3
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	0
Sound	2	0
Complies with Duty to Cooperate	2	0

Policy is well thought out.

**Representation Numbers** (Statutory consultees in bold and named)

**ANON-AQTS-32U8-B/Historic England** (this representation does not have a full rep number because it was not directly entered into Citizenspace) ANON-AQTS-3BSY-T/97/D9

ANON-AQTS-32CD-5 - Colden Common Parish Council/51/D9

Main issues raised in representations received in regulation 19 consultation

None

Delias/Fridance base	DO.
Policy/Evidence base	D9
document	
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the policy	
legally compliant or sound?	
What is your suggested	
wording or text for the policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	Letter (commenting on policies)
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.	
However, the links provided may	
contain additional details, such	
as images, tables, or tracked	
changes, if applicable.	

Policy/Evidence base	D9
document	
Name of respondent (or	Rob Edgecock
client)	
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/97/D9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	The policy is well thought-out.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	No. 1 doubt count to take want in a basing passion
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D9
document	
Name of respondent (or	Debbie Harding
client)	Š
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/51/D9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	NI <sub>a</sub>
Have you submitted	No
supporting information?  All relevant information related	
to the specific policy or allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	
Hacked Changes, II applicable.	

Comments noted.
WCC Recommended Changes arising from representations:
None.

Local Plan Reference or document			Policy D10 Signage	
Total Number of Representations received			4	
Number of respondents who confirmed they consider the policy is –		Yes	No	
Legally Compliant		2	1	
Sound		2	1	
Complies with Duty to Cooperate		2	1	

A respondent refers to the policy being well thought out whereas there is a request for the Policy to also refer to street signage such as direction signs, road signage and other highways, WCC or HCC signs.

**Representation Numbers** (Statutory consultees in bold and named)

**ANON-AQTS-32U8-B/Historic England** (this representation does not have a full rep number because it was not directly entered into Citizenspace)

ANON-AQTS-3BSY-T/46/D10

ANON-AQTS-32CD-5 - Colden Common Parish Council/26/D10

ANON-AQTS-323A-J/3/D10

# Main issues raised in representations received in regulation 19 consultation

• Need for the policy to refer to street signage.

Policy/Evidence base	D10
document	
Name of respondent (or	Guy Robinson
client)	
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	
Legally compliant?	
Sound?	Yes
Complies with duty to co-	
operate?	
Policy/Document comment	
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	
hearing sessions for this	
policy?	
Have you submitted	Yes
supporting information?	<u>Letter (commenting on policies)</u>
All relevant information related	Email correspondence (between officers and Historic England)
to the specific policy or	Email correspondence (between officers and Historic England re: suggested changes)
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D10
document	
Name of respondent (or	Rob Edgecock
client)	· · ·
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/46/D10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	The policy is well thought-out.
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	140, I don't want to take part in a nearing session
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D10
document	
Name of respondent (or	Debbie Harding
client)	
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/26/D10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-	Yes
operate?	
Policy/Document comment	No comment but could not skip through this section
What modification(s) are	
necessary to make the	
policy legally compliant or	
sound?	
What is your suggested	
wording or text for the	
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	No, I don't want to take part in a hearing session
hearing sessions for this	
policy?	
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been	
included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	

Policy/Evidence base	D10
document	
Name of respondent (or	Steven Favell
client)	
Personal reference number	ANON-AQTS-323A-J
Full reference number	ANON-AQTS-323A-J/3/D10
Legally compliant?	No
Sound?	No
Complies with duty to co- operate?	No
Policy/Document comment	Expansion required to include street signage such as direction signs, road signage and other highways, WCC or HCC signs. Current signage for the Romsey road / Clifton Terrace area is a visual disaster.
What modification(s) are	Is the survey here to invite comment or to discuss purely whether the submission is legal? Being legal does
necessary to make the	not make it right.
policy legally compliant or	
sound?	
What is your suggested	Road signs, directions signs and other local authority signs should be at a minimum to avoid confusion and
wording or text for the	distraction to road users and avoid distracting visual clutter that detracts from the environment.
policy?	
Do you agree with how the	
policy will be monitored?	
If no, please explain	
Do you want to participate in	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
hearing sessions for this	
policy?	A.I.
Have you submitted	No
supporting information?	
All relevant information related	
to the specific policy or	
allocation has already been included in the representation.	
However, the links provided	
may contain additional details,	
such as images, tables, or	
tracked changes, if applicable.	
Hacked Changes, II applicable.	

WCC Response.	
Comments noted.	
WCC Recommended Changes arising from representations:	
None.	