

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

Biodiversity and the Natural Environment

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

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

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

Local Plan Reference or document	Policy NE1 Protecting and Enhancing Biodiversity and the Natural Environment in the District		
Total Number of Representations received			31
Number of respondents who confirmed they consider the policy is –	Yes	No	
Legally Compliant	25	1	
Sound	11	15	
Complies with Duty to Cooperate	23	2	
<p>Summary of Representations 90% of responses received support the overarching objective of the policy to protect and enhance the natural environment. Respondents suggest that the policy should reference the Hampshire Local Nature Recovery Strategy to ensure better biodiversity mapping and adopting an ecosystem services approach.</p> <p>Some comments raise support for the objectives and policy in prioritising brownfield land, on site mitigation and compensation. 50% of responses express concern that the policy does not meet the requirement of local and national policies (NPPF) particularly in relation to biodiversity, flood management and landscape protection. Suggestions include incorporating valued landscapes into the policy criterion.</p> <p>Concerns were raised in relation to providing further clarity and guidelines within the policy and supporting text, with recommendations for providing additional definitions in the glossary and additional text on the implementation of the policy. There were criticisms raised that the policy does not set adequate guidelines for developers to follow the mitigation hierarchy or engagement with local conservation projects. A key concern of respondents is the preservation and enhancement of accessible green spaces for health and recreation and the need to incorporate this within Policy NE1. Suggestions that there should be a requirement for suitable alternative natural green space when existing open space is developed on.</p>			
<p>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-3BR1-H/4/NE1 ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/30/NE1 ANON-AQTS-3BRX-R/2/NE1 ANON-AQTS-3BSY-T/43/NE1 ANON-AQTS-3BPG-5/1/NE1 ANON-AQTS-327N-3/1/NE1 ANON-AQTS-3B5A-4/4/NE1 ANON-AQTS-3B54-Q/2/NE1</p>			

ANON-AQTS-32CD-5 - Colden Common Parish Council/25/NE1

ANON-AQTS-32UM-Z/4/NE1

ANON-AQTS-32UK-X - Environment Agency/12/NE1

ANON-AQTS-329Q-8/19/NE1

ANON-AQTS-3BQA-Z/8/NE1

ANON-AQTS-32FT-R - New Alresford Town Council/4/NE1

ANON-AQTS-32FC-7/1/NE1

ANON-AQTS-32FB-6/1/NE1

ANON-AQTS-322Q-1/1/NE1

ANON-AQTS-3224-4/1/NE1

ANON-AQTS-32ZE-W/1/NE1

ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/9/NE1

ANON-AQTS-32N7-3 - Twyford Parish Council/1/NE1

BHLF-AQTS-32EU-R - Hursley Parish Council/2/NE1

BHLF-AQTS-3267-B/4/NE1

BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/9/NE1

BHLF-AQTS-328Y-F/6/NE1

BHLF-AQTS-328Q-7/6/NE1

BHLF-AQTS-3282-8 - Natural England/9/NE1

BHLF-AQTS-328M-3/2/NE1

BHLF-AQTS-328R-8 - Hampshire County Council/14/NE1

BHLF-AQTS-32QQ-Z/6/NE1

Main issues raised in representations received in regulation 19 consultation

- Overarching objectives of the policy supporting, including the prioritisation of brownfield land and the approach towards on site mitigation.
- Aligning the policy with National and Local policy requirements.
- Further clarity and guidelines within the policy and supporting text.
- Preservation and enhancement of accessible green spaces.
- Reference to the Local Natural Recovery Strategy and mitigation hierarchy.

Policy/Evidence base document	NE1
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	We encourage explicit acknowledgement that the natural and historic environment are integral to each other. We suggest amending key issue iv in this regard
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 helps to ensure that the landscape and natural environment of the district which is valued so highly is protected and enhanced. The complex interplay between landscape, the natural environment, historic features and cultural connections means that an integrated approach to their management is recommended.”
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Email correspondence (between officers and Historic England) Email correspondence (between officers and Historic England re: suggested changes)

Policy/Evidence base document	NE1
Name of respondent (or client)	Lois Gravely
Personal reference number	ANON-AQTS-3BR1-H
Full reference number	ANON-AQTS-3BR1-H/4/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Dealing with the nature crisis requires that 30% of land is protected for nature. Currently the level protected stands at just over 2%. I would like to know what policies are place to protect valuable bio-diverse areas such as Bushfield Camp on the outskirts of Winchester.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
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/30/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Plan recognises the importance of the natural environment and this policy sets out the framework for managing the impact of development on it. Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity. The Parish Council considers that the natural environment of the district is one which must be protected and opportunities taken to enhance it. It supports the policy. Support Policy NE1
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Christopher Napier
Personal reference number	ANON-AQTS-3BRX-R
Full reference number	ANON-AQTS-3BRX-R/2/NE1
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>CPRE Hampshire considers Policy NE1 with Policy NE9 is not justified or consistent with national policy for the reasons set out below:</p> <p>1) these policies do not provide for protection of "valued landscapes"</p> <p>It is clear from the Vision that enhancement of the natural environment is key strategy of this Local Plan, including specifically natural beauty, biodiversity and cultural heritage. This strategy has our strong support. Accordingly, our strong support is given also to the Objectives designed to achieve those aspirations, notably; by prioritising the development of brownfield land (Objective ii); to conserve and enhance Winchester Districts valuable environments including both the urban and rural areas as well as the built, historic and natural environments (Objective iii); and to ensure that development does not have an adverse impact on landscape character or the unique and special characteristics of the national park (Objective iv).</p> <p>We note also proposed Policy NE1 paragraphs 7.6 and 7.7 stating the need to protect the countryside from unplanned and large-scale development, recognising the intrinsic character and beauty of the countryside (as required per NPPF), and noting that one of the key aims of the Local Plan is to concentrate development within the most sustainable locations and to protect the countryside from unnecessary development. In implementing the Objectives outlined above, these aims have our strong support.</p> <p>It has long been a key strategy of the Council to protect and enhance the natural beauty of the area before and after the advent of the South Downs National Park. Natural beauty encompasses landscape and scenic quality, relative tranquillity and natural heritage features. This key strategy is rightly carried forward to this Plan in the manner set out above in the Vision, Objectives, and the wording of proposed Strategic Policy NE1.</p> <p>However, as regards landscape the 2023 NPPF paragraph 180(a) states:</p> <p>180. Planning policies.....should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes,(in a manner commensurate with their.....identified quality in the development plan).</p> <p>The wording of this paragraph is not proposed to be altered in the current proposed amendments to the NPPF.</p>

The meaning of "valued landscapes" is not defined within the NPPF, but it has become established and accepted by way of court judgments and Inspectors and Secretary of State decisions that a 'valued landscape' is a landscape outside a "designated landscape" (i.e., national park or AONB) that is more than 'mere countryside' but is a landscape that has sufficient demonstrable physical attributes to take it beyond ordinary landscape or 'out of the ordinary'. It is similarly established and accepted that development in a valued landscape should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused, and that this is a material consideration to be taken into account in the decision-making process.

This need to protect valued landscapes is recognised in proposed Policy NE1 paragraph 7.22 which, states that that "Valued landscapesshould be protected and enhanced", following the wording of NPPF 180(a). However this recognition is not carried forward to the text of the Policy itself.

While Policy NE9 on Landscape Character has our support, the process of Landscape Character Assessment which underpins Policy NE9 has the object only of identifying what makes one area "different" or "distinct" from another. Often it also identifies relevant issues and planning considerations but it is nevertheless a separate process from landscape evaluation, which concentrates on relative value. Landscape Character Assessment does not identify any landscape as "valued" and so Policy NE9 makes no specific provision for protecting and enhancing "valued landscapes" as required by the NPPF.

The fact that the landscape of the plan area (ie outside the national park) contains landscape of high value is acknowledged within the wording of the Plan along with the need for a key strategy to protect and enhance its natural beauty. Also the specific reference to valued landscapes in Policy NE1 paragraph 7.22. It is confirmed by the fact that at the link below is a Policies Map from the 1999 Local Plan showing areas designated as Areas of Special Landscape Quality.

[ASLQ-Designation.pdf \(cprehampshire.org.uk\)](https://www.cprehampshire.org.uk/ASLQ-Designation.pdf)

Such local landscape designations were discouraged by central government in England and so not carried forward into the current Local Plan; but CPRE Hampshire can assert from its own knowledge that, on the whole, the quality of these areas of landscape remains high and if reassessed would qualify as "valued landscape". Indeed, in assessing landscape in planning applications, it is acknowledged that some landscape is "valued landscape" and that this is a material consideration. For example, see the Officers Report to the Planning Committee in 23/01025/FUL (Land South Of Crabwood, Sarum Road, Sparsholt, Hampshire) in which it is acknowledged that "the higher test as set out in para 180(a) NPPF applies".

In its analysis of the comments made in the Regulation 18(2) consultation which called for protection for "valued landscape" (including from CPRE Hampshire) the Council considered that the case law on the subject is contradictory, and accordingly it would not be appropriate to add this protection. CPRE Hampshire disagrees with this analysis and it would be helpful to understand which case law it is referring to.

While it is sometimes suggested that the words "(in a manner commensurate with their..... identified quality in the development plan)", added to the NPPF in 2018, requires valued landscape to be identified in the development plan, eg by way of a policies map, this is by no means a universal view and has not been

	<p>endorsed by court judgment. While CPRE Hampshire would prefer such mapped identification, we consider it essential only to have a specific policy to protect and enhance valued landscapes, both to be consistent with the NPPF and as a critical part of implementing the key Plan strategy to enhance the natural environment, There is clear precedent for a specific policy to protect and enhance valued landscapes within Hampshire. We note, by way of example, that Policy 5 in the submitted version of the Hampshire Minerals and Waste Plan provides:</p> <p>3. Minerals and waste development which is considered to be within a valued landscape shall only be permitted where they meet the above criteria, and where it protects and where possible, enhances the landscape with particular regard to:</p> <ul style="list-style-type: none"> i. The intrinsic landscape character and quality; ii. The visual setting (including key views); iii. The landscape's role in natural capital and ecological networks; iv. The local character and setting of built development (including historical significance); and v. Natural landscape features (including ancient woodland, trees, hedgerows, and water courses etc). <p>and the Basingstoke and Dean Local Plan consultation version provides:</p> <p>Landscapes of particularly high value outside of the National Landscape are identified as Valued Landscapes on the Policies Map. Development proposals will only be permitted in these areas where they protect and enhance features that contribute to the character, quality and interpretation of these landscapes</p> <p>And, where Areas of Special Landscape Quality are stated to be valued landscapes, the adopted Fareham Local Plan provides;</p> <p>Areas of Special Landscape Quality have been identified in the Borough and are shown on the Policies map. Development proposals shall only be permitted in these areas where the landscape will be protected and enhanced.</p> <p>Accordingly, CPRE Hampshire submits that the Plan is not consistent with national policy in the form of NPPF paragraph 180(a) and is not an appropriate strategy to implement the key strategy of protecting and enhancing the natural beauty of the plan area, taking into account the reasonable alternative of including a specific policy to protect valued landscapes</p> <p>References CPRE-Hampshire-Position-Statement-Landscape-and-Valued-Landscapes-V2-Aug23.docx (live.com) Defining-Valued-Landscapes-CPRE-Hampshire-Briefing-Document-Sept-2021.pdf (cprehampshire.org.uk)</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Include a Policy compliant with NPPF paragraph 180(a) Further, CPRE Hampshire considers it appropriate for the Council to give a commitment to identify valued landscape within the plan area as part of the next Local Plan Review.</p>

<p>What is your suggested wording or text for the policy?</p>	<p>Development which is considered to be within a valued landscape shall only be permitted where it protects and, where possible, enhances the landscape with particular regard to:</p> <ul style="list-style-type: none"> i. The intrinsic landscape character and quality; ii. The visual setting (including key views); iii. The landscape's role in natural capital and ecological networks; iv. The local character and setting of built development (including historical significance); and v. Natural landscape features (including ancient woodland, trees, hedgerows, and water courses etc). <p>Such a policy would not preclude appropriate development within a valued landscape, but would ensure appropriate consideration is given to the need for the proposed development to be within a valued landscape and, if so, its location within that landscape and its design so as to protect the landscape and comply with NPPF paragraph 180(a).</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE1
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/43/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The plan emphasises the need for all developments to protect the natural environment. This must have a very high priority for all future developments.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
Name of respondent (or client)	Catharine Gale
Personal reference number	ANON-AQTS-3BPG-5
Full reference number	ANON-AQTS-3BPG-5/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We support Paragraph 7.23 in principle, especially as swift bricks are mentioned rather than the inferior external swift boxes, but it's currently not sound nor effective because there isn't enough detail about the installation of swift bricks to ensure suitable specification, numbers and locations, and it's not currently clear that extensions are included. Swift bricks are a universal nest brick for small bird species so are suitable for all developments.</p> <p>Hampshire Swifts is a charity set up in 2016 to address the decline in swifts. We operate across the county raising awareness of swifts' needs and encouraging the provision of new nest sites. We have over 4000 members/supporters.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Please include additional detail regarding scope and implementing best-practice guidance.
What is your suggested wording or text for the policy?	Swifts bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021:2022 or CIEEM.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Winchester Action on the Climate Crisis (WinACC)
Personal reference number	ANON-AQTS-327N-3
Full reference number	ANON-AQTS-327N-3/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE1 is not consistent with Chapter 15, Paragraph 180 of the NPPF and the need for Sustainable Development. It does not adequately address the increasing biodiversity and climate challenges with optimal solutions or harm avoidance measures. It fails to integrate an Ecosystems Services approach, which is essential for fully understanding and avoiding harm to the economic, social, and environmental benefits of biodiversity, natural capital, sustainable land management and communities.</p> <p>Ecosystem functions include the physicochemical and biological processes that occur within natural ecosystems to maintain terrestrial life. Ecosystem services are the set of ecosystem functions that are directly linked to benefit human well-being. Ecological networks are representations of the interactions that occur between species within a community. Generating little or no harm to Ecological networks and Ecosystem services is essential for human well-being, nature and the mitigating plus adapting to climate change. Without the adoption of an Ecosystem Services approach, it is impossible to comprehensively assess and mitigate the long-term impacts of development(s) on biodiversity, climate change, the natural environment and communities. This plan and this policy therefore fails to address how developments will ensure holistic resilience in response to future climatic pressures and biodiversity loss, thus neglecting to fully uphold NPPF objectives especially viable sustainable development.</p> <p>The Winchester District overlap with the South Downs National Park (SDNP) heightens the need for a cohesive approach between nature conservation (protection and restoration) and climate mitigation/adaptation measures across both authority regions which can be achieved with adoption of Ecosystem Services in local planning practise.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	To rectify this, this Plan should incorporate a similar approach to the SDNP by introducing a new clause and requirement for full Ecosystem Services impact assessments for all Planning Applications. This will assist a more comprehensive assessment of harm and delivery of viable sustainable development and protection of ecosystem services. BNG protocols do not do this!
What is your suggested wording or text for the policy?	Add Sub-paragraph (vi): "All planning applications must include a statement demonstrating how the development impacts both positively and negatively on Ecosystem Services."

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Nia Powys
Personal reference number	ANON-AQTS-3B5A-4
Full reference number	ANON-AQTS-3B5A-4/4/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>BSP appreciate the need for development to protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species as set out within Strategic Policy NE1.</p> <p>No part of the land at Fairthorne Grange is covered by any statutory or non-statutory designations, and all such designations are well separated from the Site. However, we acknowledge that detailed protected species surveys, BNG calculations and a nutrient budget calculation will be required to accompany any forthcoming planning application on site.</p>
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Nia Powys
Personal reference number	ANON-AQTS-3B54-Q
Full reference number	ANON-AQTS-3B54-Q/2/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Blenheim Strategic Partners appreciate the need for development to protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species as set out within Strategic Policy NE1.</p> <p>The draft allocation at Land north of Rareridge Lane has already been assessed from an ecological perspective, with previous studies and surveys being conducted to inform the development proposals. An Environmental Dimension Partnership has prepared an Ecological Technical Note which demonstrates the deliverability and sensitive design approach towards the site.</p> <p>No part of the Site is covered by any statutory or non-statutory designations, and all such designations are well separated from the Site. However, we acknowledge that detailed protected species surveys, BNG calculations and a nutrient budget calculation will be required to accompany any forthcoming planning application on site.</p>
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?	No

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/25/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
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/4/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Whilst Anchor Properties supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration must be given to the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 makes reference to “key species”, “key habitats” and “key habitat type”, whilst criteria (iii) uses the phrase ‘Ecological Network.’ Yet neither “key species” nor “key habitat” nor “key habitat type” nor “Ecological Network” is defined in the plan. It is therefore not clear which species and habitats are key and which are not, nor what constitutes such a network. The above should be defined within the local plan glossary for added certainty for developers and the council going forward.</p> <p>Criterion (i) fails to acknowledge the provision within paragraph 186 of the NPPF (2023) to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria (i) of the draft policy.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Whilst Anchor Properties supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration must be given to the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 makes reference to “key species”, “key habitats” and “key habitat type”, whilst criteria (iii) uses the phrase ‘Ecological Network.’ Yet neither “key species” nor “key habitat” nor “key habitat type” nor “Ecological Network” is defined in the plan. It is therefore not clear which species and habitats are key and which are not, nor what constitutes such a network. The above should be defined within the local plan glossary for added certainty for developers and the council going forward.</p> <p>Criterion (i) fails to acknowledge the provision within paragraph 186 of the NPPF (2023) to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria (i) of the draft policy.</p>
What is your suggested wording or text for the policy?	‘... i. Avoids significant harm to the natural environment, biodiversity and geodiversity or can adequately mitigate, or (as per paragraph 186 of the NPPF (2023)) as a last resort compensate for, any harm arising and can clearly demonstrate that there will be no adverse impact on the conservation status of key species,

	internationally protected sites, nationally protected designated sites, or locally designated sites and there will be no net loss or deterioration of a key habitat type including irreplaceable habitats and the integrity of linkages between designated sites and key habitats; ...'
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
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/12/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We are supportive of this policy. It would be useful to reference the forthcoming Hampshire Local Nature Recovery Strategy (LNRS) within the policy as a source of habitat maps and biodiversity priorities for the area.</p> <p>In point ii. of the policy an addition could be made within the list that begins with the sentence "measures to retain, conserve and enhance habitats, including..." to also include "relevant local priorities for nature recovery specified within the Hampshire Local Nature Recovery Strategy"</p> <p>An additional section could also be added to paragraph 7.23 to say "The Hampshire Local Nature Recovery Strategy will provide maps of the most valuable areas for wildlife, opportunities to improve nature in the future and local priorities for nature recovery."</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>We are supportive of this policy. It would be useful to reference the forthcoming Hampshire Local Nature Recovery Strategy (LNRS) within the policy as a source of habitat maps and biodiversity priorities for the area.</p> <p>In point ii. of the policy an addition could be made within the list that begins with the sentence "measures to retain, conserve and enhance habitats, including..." to also include "relevant local priorities for nature recovery specified within the Hampshire Local Nature Recovery Strategy"</p> <p>An additional section could also be added to paragraph 7.23 to say "The Hampshire Local Nature Recovery Strategy will provide maps of the most valuable areas for wildlife, opportunities to improve nature in the future and local priorities for nature recovery."</p>
What is your suggested wording or text for the policy?	<p>We are supportive of this policy. It would be useful to reference the forthcoming Hampshire Local Nature Recovery Strategy (LNRS) within the policy as a source of habitat maps and biodiversity priorities for the area.</p> <p>In point ii. of the policy an addition could be made within the list that begins with the sentence "measures to retain, conserve and enhance habitats, including..." to also include "relevant local priorities for nature recovery specified within the Hampshire Local Nature Recovery Strategy"</p> <p>An additional section could also be added to paragraph 7.23 to say "The Hampshire Local Nature Recovery Strategy will provide maps of the most valuable areas for wildlife, opportunities to improve nature in the future and local priorities for nature recovery."</p>

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/19/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Whilst Bloor Homes supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration is required in respect of the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 fails to acknowledge the provision within paragraph 186 of the NPPF to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria i of the draft policy. As it is currently drafted the policy is not consistent with the NPPF.</p> <p>Clarity is also required in relation criteria iii as to what is meant by 'Ecological Network' as this is not defined in supporting text or the glossary.</p> <p>Draft Policy NE1 is not currently consistent with the NPPF in that sites must be protected and enhanced "in a manner commensurate with their statutory status or identified quality". Policy requirements related to non-designated ecological assets should therefore be proportionate to the value of that asset.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Whilst Bloor Homes supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration is required in respect of the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 fails to acknowledge the provision within paragraph 186 of the NPPF to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria i of the draft policy. As it is currently drafted the policy is not consistent with the NPPF.</p> <p>Clarity is also required in relation criteria iii as to what is meant by 'Ecological Network' as this is not defined in supporting text or the glossary.</p> <p>Draft Policy NE1 is not currently consistent with the NPPF in that sites must be protected and enhanced "in a manner commensurate with their statutory status or identified quality". Policy requirements related to non-designated ecological assets should therefore be proportionate to the value of that asset.</p>

<p>What is your suggested wording or text for the policy?</p>	<p>Whilst Bloor Homes supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration is required in respect of the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 fails to acknowledge the provision within paragraph 186 of the NPPF to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria i of the draft policy. As it is currently drafted the policy is not consistent with the NPPF.</p> <p>Clarity is also required in relation criteria iii as to what is meant by ‘Ecological Network’ as this is not defined in supporting text or the glossary.</p> <p>Draft Policy NE1 is not currently consistent with the NPPF in that sites must be protected and enhanced “in a manner commensurate with their statutory status or identified quality”. Policy requirements related to non-designated ecological assets should therefore be proportionate to the value of that asset.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)</p>

Policy/Evidence base document	NE1
Name of respondent (or client)	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
Personal reference number	ANON-AQTS-3BQA-Z
Full reference number	ANON-AQTS-3BQA-Z/8/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Draft Strategic Policy NE1 relates to protecting and enhancing Biodiversity and the Natural Environment in the district. Bloor is generally supportive of this policy and its requirements, as indicated above, however consider that the policy does not clearly set out the hierarchy of protection and does not provide adequate advice for developments to follow the mitigation hierarchy. The Environmental Dimension Partnership Ltd (EDP), has advised Bloor that it is not necessarily feasible to protect and enhance all natural resources and there are now means available to compensate and ensure long-term gains are delivered, yet the wording of the policy is restrictive/contradictory.
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Suggested Rewording of Policy NE1</p> <p>Winchester District Council recognises the climate and biodiversity emergency and therefore supports developments which can demonstrate that they are enhancing the natural environment and biodiversity including the natural beauty of the landscape, resources, ecology, and the air and water environments of the district. This will be undertaken by:</p> <ul style="list-style-type: none"> • Development proposals shall demonstrate that the national policy and legislation has been followed including ensuring that the mitigation hierarchy has been followed sequentially; • Where development is considered necessary, adequate mitigation measures or, exceptionally, compensatory measures, will be required, with the aim of providing an overall improvement in local biodiversity; • Where development is likely to cause harm to internationally or nationally important sites or irreplaceable habitats, they will not be permitted unless there is no suitable alternative and there are imperative reasons of overriding public interest. Only then, if compensation provision can be secured to ensure the overall coherence of the sites or habitats is protected, can development be permitted; and • Other key habitats, key species or locally designated sites should be protected, managed and enhanced. If this is not possible mitigation will be required, which should be delivered on-site where at all possible. Up to date ecological assessment in accordance with industry standards will be required to support and inform development proposals. <p>Point i - "Avoids significant harm to the natural environment, biodiversity and geodiversity or can adequately mitigate any harm arising and can clearly demonstrate that there will be no adverse impact on the</p>

	<p>conservation status of key species, internationally protected sites, nationally protected designated sites, or locally designated sites and there will be no net loss or deterioration of a key habitat type including irreplaceable habitats and the integrity of linkages between designated sites and key habitats.”</p> <p>Comment - Refer to the suggested re-wording of this policy which gives better clarity on how to follow the mitigation hierarchy. Currently, there are sites and habitats of differing ecological and geographical values which are blended into the same sentence, and it reads that you cannot mitigate for the loss of any key habitats which should not be the case.</p> <p>Point v - “Normally any mitigation, compensation and enhancement measures are required to be delivered on-site, unless special circumstances dictate that off- site mitigation or compensation is more appropriate. A financial contribution, in lieu of on-site mitigation, will only be considered in limited circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective.”</p> <p>Comment - It is recommended the word ‘normally’ is removed as a minimum. This is no longer acceptable given the requirements of the Environment Act 2021. Providing the mitigation hierarchy is followed, a development can legally compensate for any deficits via off-site habitat units or purchase of biodiversity credits. Refer to the suggested re-wording of the policy above.</p> <p>Alternatively, Point v could be removed in its entirety. Whilst the wording in Point v has been softened from the Regulation 18 version (from consideration in ‘very exceptional circumstances’ to ‘limited circumstances’) the exploration of off-site solutions must now be considered appropriate in all cases as part of any viability study providing the mitigation hierarchy is followed and trading rules can be satisfied.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>Suggested Rewording of Policy NE1</p> <p>Winchester District Council recognises the climate and biodiversity emergency and therefore supports developments which can demonstrate that they are enhancing the natural environment and biodiversity including the natural beauty of the landscape, resources, ecology, and the air and water environments of the district. This will be undertaken by:</p> <ul style="list-style-type: none"> • Development proposals shall demonstrate that the national policy and legislation has been followed including ensuring that the mitigation hierarchy has been followed sequentially; • Where development is considered necessary, adequate mitigation measures or, exceptionally, compensatory measures, will be required, with the aim of providing an overall improvement in local biodiversity; • Where development is likely to cause harm to internationally or nationally important sites or irreplaceable habitats, they will not be permitted unless there is no suitable alternative and there are imperative reasons of overriding public interest. Only then, if compensation provision can be secured to ensure the overall coherence of the sites or habitats is protected, can development be permitted; and • Other key habitats, key species or locally designated sites should be protected, managed and enhanced. If this is not possible mitigation will be required, which should be delivered on-site where at all possible. Up to date ecological assessment in accordance with industry standards will be required to support and inform development proposals.

	<p>Point i - “Avoids significant harm to the natural environment, biodiversity and geodiversity or can adequately mitigate any harm arising and can clearly demonstrate that there will be no adverse impact on the conservation status of key species, internationally protected sites, nationally protected designated sites, or locally designated sites and there will be no net loss or deterioration of a key habitat type including irreplaceable habitats and the integrity of linkages between designated sites and key habitats.”</p> <p>Comment - Refer to the suggested re-wording of this policy which gives better clarity on how to follow the mitigation hierarchy. Currently, there are sites and habitats of differing ecological and geographical values which are blended into the same sentence, and it reads that you cannot mitigate for the loss of any key habitats which should not be the case.</p> <p>Point v - “Normally any mitigation, compensation and enhancement measures are required to be delivered on-site, unless special circumstances dictate that off- site mitigation or compensation is more appropriate. A financial contribution, in lieu of on-site mitigation, will only be considered in limited circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective.”</p> <p>Comment - It is recommended the word ‘normally’ is removed as a minimum. This is no longer acceptable given the requirements of the Environment Act 2021. Providing the mitigation hierarchy is followed, a development can legally compensate for any deficits via off-site habitat units or purchase of biodiversity credits. Refer to the suggested re-wording of the policy above.</p> <p>Alternatively, Point v could be removed in its entirety. Whilst the wording in Point v has been softened from the Regulation 18 version (from consideration in ‘very exceptional circumstances’ to ‘limited circumstances’) the exploration of off-site solutions must now be considered appropriate in all cases as part of any viability study providing the mitigation hierarchy is followed and trading rules can be satisfied.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on Policies & Evidence Base) Supporting document 1 (South Winchester Vision Document) Supporting document 2 (Response to the delivery of housing) Supporting document 3 (Technical Note 1 - Sustainability & Transport) Supporting document 4 (Technical Note 2 - Transport Feasibility Report) Supporting document 5 (Statement of Common Ground between Bloor Homes & Stagecoach (South) Ltd)</p>

Policy/Evidence base document	NE1
Name of respondent (or client)	Richard Doughty
Personal reference number	ANON-AQTS-32FT-R - New Alresford Town Council
Full reference number	ANON-AQTS-32FT-R - New Alresford Town Council/4/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We welcome the policies set out in NE1 and would ask that NE1 iv) be extended to include development which would result in the loss or deterioration of areas of the floodplain.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
Name of respondent (or client)	Lynn Fomison
Personal reference number	ANON-AQTS-32FC-7
Full reference number	ANON-AQTS-32FC-7/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Paragraph 7.23 is welcome. Currently it is not sound or effective as there is insufficient detail about the installation of swift bricks. This is to ensure suitable numbers of swift bricks are installed in appropriate locations.
What modification(s) are necessary to make the policy legally compliant or sound?	Please add further detail regarding implementing best practice guidelines.
What is your suggested wording or text for the policy?	Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions in accordance with best practice guidance.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
Name of respondent (or client)	Timothy John Norriss
Personal reference number	ANON-AQTS-32FB-6
Full reference number	ANON-AQTS-32FB-6/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Paragraph 7.23 is welcome. Currently it is not sound or effective as there is insufficient detail about installation of swift bricks. This is to ensure that suitable numbers of swift bricks are installed and that they are installed in appropriate locations.
What modification(s) are necessary to make the policy legally compliant or sound?	Please add further detail regarding implementing best_practice guidance.
What is your suggested wording or text for the policy?	Swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
Name of respondent (or client)	Guy Allison
Personal reference number	ANON-AQTS-322Q-1
Full reference number	ANON-AQTS-322Q-1/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	In numerous place, including Key Issues (Pg. 134 bullet 'x'), and paragraph 7.22 (2nd bullet), the importance of Local Green Spaces are indicated. This however does not form part of Strategic Policy NE1. A commitment should be included that local community submissions for Local Green Space application will be given full consideration with regards to how such application would meet the wider commitments of the Local Plan.
What modification(s) are necessary to make the policy legally compliant or sound?	An addition of a commitment to Local Green Space consideration within NE1, (or elsewhere if deemed more appropriate).
What is your suggested wording or text for the policy?	In accordance with The National Planning Policy Framework and associated Planning Policy Guidance, the designation of Local Green Space allows communities to identify and protect green areas of particular importance to them. As such, all such application for such designation by local communities will be given due and full consideration, with particular focus upon how such designation would support the wider commitments within this Local Plan.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Michael Priaulx
Personal reference number	ANON-AQTS-3224-4
Full reference number	ANON-AQTS-3224-4/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>In summary, this policy and specifically paragraph 7.23 is welcome, as it refers to swift bricks which are a permanent feature and therefore a much better option than external swift boxes, but the paragraph is not currently sound nor effective because there's insufficient detail about swift brick installation to ensure the optimum type, numbers and locations, and it's not currently clear about the scope, i.e. that extensions are included.</p> <p>In more detail, swift bricks are a universal nest brick for small bird species so are suitable for all buildings, e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).</p> <p>Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)).</p> <p>Many other Local Authorities are including detailed swift brick requirements in their Local Plan, such as Tower Hamlets Local Plan Regulation 18 stage (paragraph 19.70, page 311 https://democracy.towerhamlets.gov.uk/mglIssueHistoryHome.aspx?lId=136448), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/), so such an enhanced level should also be considered.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Additional clarification reading best-practice guidance and scope.

What is your suggested wording or text for the policy?	Swifts bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM, at least one swift brick per home on average per development.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
Name of respondent (or client)	Timothy John Norriss
Personal reference number	ANON-AQTS-32ZE-W
Full reference number	ANON-AQTS-32ZE-W/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Currently it is not sound or effective as there is insufficient detail about installation of swift bricks. This is to ensure suitable numbers of swift bricks are installed and that they are installed in appropriate locations.
What modification(s) are necessary to make the policy legally compliant or sound?	Please add further detail regarding implementing best-practice guidance.
What is your suggested wording or text for the policy?	Swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
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/9/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies.</p> <p>The Trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individuals' health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Jamie Matthews .. Clerk
Personal reference number	ANON-AQTS-32N7-3 - Twyford Parish Council
Full reference number	ANON-AQTS-32N7-3 - Twyford Parish Council/1/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent comments on policies NE1,4.6 and 17 and the objections made are repeated in response to each policy. Concern that the Itchen and its valley are only referenced in relation to the old part of Winchester and South of Kiln lane to the Eastleigh district boundary. The Parish Council highlights that they play a vital part in the daily life of many of Winchester's residents and are a key part of its infrastructure. The Parish Council are concerned that Winchester's population has a significant impact on the river itself, on the valley and its landscape and on its ecology, with potential for both benefit and harm. Most of the river and its floodplain is within the South Downs National Park; 4 km of the river south of Winchester runs through the parish of Twyford. The Parish Council state that the role of the Itchen, includes flood, water supply, water quality, recreation, pollution, ecology landscape and heritage. To address all these, WDLP rightly identifies the importance the Itchen, both as river and valley, in multiple places within the plan but particularly within policies NE 1, 4, 6 and 17. Where these policies are deficient, however, is in failing to show how they are all to be applied in cooperation with multiple agencies and cross borders. NE7 for instance recognises the need for instance in 7.122 but this covers only flooding and it does not stray beyond the boundaries of WCC. The plan refers to cross border policies in NE1 for the protections for the SAC and SSSI for Natura 2000. However, the plan does not give guidance about integrating the policies of other agencies either for the WDLP area or for the cross-border issues, so that the Itchen and its valley/corridor are dealt with as a whole. In short, the policies for the Itchen fail the tests of soundness. This is because without a mechanism for integrating and reconciling policies both within the WDLP and for the river and its valley, policies NE1,4,6 and 17 cannot be effective and do not demonstrate cooperative working.</p> <p>The Parish Council are concerned that the Plan does not refer to the Itchen and its valley are nationally and internationally important on ecological grounds and nationally important is landscape. Cross border issues of pollution are dealt with by the WDLP so there can be no question of cross-border issues being beyond the scope of the WDLP. Please see comments on NE4</p>
What modification(s) are necessary to make the	NE1 add to para: 7.24: recognise that in order to ensure compliance with environmental legislation, especially the Habitats Regulations, further work is needed to reconcile competing demands including from

policy legally compliant or sound?	development, flood prevention, pollution control, drinking water abstraction; integrated land use plans for the river valleys and catchments will be prepared.
What is your suggested wording or text for the policy?	NE1 add to para: 7.24: recognise that in order to ensure compliance with environmental legislation, especially the Habitats Regulations, further work is needed to reconcile competing demands including from development, flood prevention, pollution control, drinking water abstraction integrated land use plans for the river valleys and catchments will be prepared.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE1
Name of respondent (or client)	David Killeen
Personal reference number	BHLF-AQTS-32EU-R - Hursley Parish Council
Full reference number	BHLF-AQTS-32EU-R - Hursley Parish Council/2/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Hursley Parish Council broadly supports the draft Local plan but considers Policy NE1 with Policy NE9 is not justified or consistent with national policy. They do not provide for the protection of 'valued landscapes'. The need to protect valued landscapes is recognised in proposed Policy NE1 paragraph 7.22 which states that that "Valued landscapesshould be protected and enhanced", following the wording of NPPF 180(a). However this recognition is not carried forward to the text of the Policy itself. There is clear precedent for a specific policy to protect and enhance valued landscapes within Hampshire. There is significant land within Hursley Parish which is designated as Valued Landscape by CPRE Hampshire.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Form (commenting on policies) Letter (commenting on policies)

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Blenheim Strategic Partners LLP
Personal reference number	BHLF-AQTS-3267-B
Full reference number	BHLF-AQTS-3267-B/4/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE1 Protecting and enhancing biodiversity and the natural environment in the district</p> <p>5.1 This policy is considered to be:</p> <ul style="list-style-type: none"> • Legally compliant • Sound • In compliance with the duty to co-operate <p>5.2 BSP supports the importance of protecting and enhancing the natural environment and biodiversity, in line with national requirements.</p> <p>5.3 The site on land east of Lovedon Lane is unique in being able to provide extensive new habitats and create ecological corridors, linking up with open space to the south and the wider habitat network. It will be able to achieve a net gain in biodiversity in excess of the policy requirements, as shown within the Vision Document appended to the Representation to Regulation 18 (see Appendix B).</p> <p>5.4 In light of the site's potential to significantly increase its biodiversity values, the Integrated Impact Assessment Report (July 2024) Appendix 5 assessment of the site (KW01) is considered to be an inaccurate assessment of the site in relation to IIA Objective 9 (biodiversity and geodiversity). The report notes the site as having "Significant negative" effects on IIA Objective 9 based on the site being within a priority habitat, albeit this does not correctly take into account the site's potential and should be amended to "negligible uncertain" with potential to be "minor positive".</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (referring to letter) Letter (commenting on policies)

Policy/Evidence base document	NE1
Name of respondent (or client)	Shirlene Oh
Personal reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
Full reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/9/NE1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Full response on website Strategic Policy NE1 NE3 NE5 The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies. The Trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individuals' health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Letter (Commenting on policies)

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

Policy/Evidence base document	NE1
Name of respondent (or client)	YMCA Fairthorne Manor Group Philipa Spicer
Personal reference number	BHLF-AQTS-328Y-F
Full reference number	BHLF-AQTS-328Y-F/6/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	Paragraph 7.2 acknowledges that “Access to the countryside, long-distance sustainable and active travel routes such as the Pilgrims’ Way and the South Downs Way, areas of green space particularly those within walking distance of residential neighbourhoods and settlements, have become increasingly important during the pandemic when people have sought opportunities for exercise and recreation closer to home. The value of access to the countryside and green space has increased greatly for much of the population and has been linked to good physical and mental health.” We absolutely agree, and our client wants to be able to help play its part and develop new facilities for sport and recreation, but given the current poor economic climate; an enabling form of development that is required which generates financial capital for complete charitable reinvestment in new social capital facilities on the 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?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been</i>	Yes Form (Table of policies) Letter (commenting on Policies and Evidence Base - includes vision document)) Supporting document 1 (Vision Document) Supporting document 2 (Vision Document)

*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	NE1
Name of respondent (or client)	Georgina Cox
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/6/NE1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Gladman recognise the importance of this policy and the need to ensure that an environment is left in a measurably better state than found prior to development. The statutory requirement to ensure at least a 10% biodiversity net gain on developments was implemented earlier this year.</p> <p>Gladman understand WCC is examining the matter of allocating a new Green Belt in the District. While we understand the need to protect areas of the countryside in the District from development it is already very constrained with the South Downs National Park to the southeast. Further to the National Park there are settlement gaps designated throughout Winchester to prevent settlements from merging and then designated countryside on land excluding the National Park throughout the District. Therefor Gladman believes it is unnecessary to put further development constraints when there are sufficient policies in place as of now.</p> <p>Policy NE1 states the Local Plan is responsible for allocating sites up until 2040 in sustainable areas. Gladman supports the allocation of Policy OT01 on Land East of Main Road for 55 dwellings and the Council's acknowledgment of the site being in a 'sustainable area,' which ensures all aspects of the natural environment and biodiversity are protected and enhanced.</p>
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

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (refers to letter) Supporting information (commenting on policies and proposed site)</p>
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Policy/Evidence base document	NE1
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/9/NE1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We welcome the inclusion of this policy and have no further comments to make.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (Commenting on policies and evidence base) Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites) Form (commenting on Air Quality only)

Policy/Evidence base document	NE1
Name of respondent (or client)	F. McElderry
Personal reference number	BHLF-AQTS-328M-3
Full reference number	BHLF-AQTS-328M-3/2/NE1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	7.36 The current plan has not been successful in protecting biodiversity (witness severe pollination declines in 2024). Plan should not only protect isolated 'designated species at risk sites' but also prioritise green corridors (including neighbouring agricultural land and gardens). All Council owned land should be managed without pesticides. 7.15 Developments must prioritise brownfield sites to avoid encroaching on countryside.
What modification(s) are necessary to make the policy legally compliant or sound?	A far stronger commitment to improving biodiversity on Council owned land and to working with partners (such as farmers and landowners) to improve the rest of land in the District
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Form (commenting on policy)

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

Policy/Evidence base document	NE1
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/14/NE1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>see PDF for mark ups and additional info</p> <p>The County Council recommend that the policy wording is updated to be consistent with the Biodiversity Gain Hierarchy set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the mitigation hierarchy approach of the NPPF (2023), paragraph 186(a).</p> <p>Proposed modifications:</p> <p><input type="checkbox"/> 'Normally any mitigation, compensation and enhancement measures are required to be delivered on-site, in line with the Biodiversity Gain Hierarchy, unless special circumstances dictate that off-site mitigation or compensation is more appropriate. Offsite mitigation or a financial contribution, in lieu of on-site mitigation, will only be considered in limited circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective.'</p>
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?	Yes Letter (commenting on policies and evidence base)

All relevant information related to the specific policy or allocation 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	NE1
Name of respondent (or client)	Lorna Selby
Personal reference number	BHLF-AQTS-32QQ-Z
Full reference number	BHLF-AQTS-32QQ-Z/6/NE1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>We welcome the inclusion of policies intended to address recreational disturbance on areas with Statutory Designated Habitat Sites and encourage the provision of open space within new development. However, we are concerned that these do not go far enough to fully integrate relevant mitigation, alternative green space provision, management and monitoring best practise in line with the obligations of relevant policy and legislation.</p> <p>We welcome Policy NE3: Open Space, Sport and Recreation for highlighting the presumption against loss of any open space unless suitable alternatives are provided. The Open Space Standard discussed in the preamble which is currently under review must align with Natural England Green Infrastructure Standards¹⁸.</p> <p>We welcome relevant wording in Strategic Policy NE1: Protecting and enhancing Biodiversity and the Natural Environment in the district. This specifies that “mitigation, compensation and enhancement measures are required to be delivered on-site, unless special circumstances dictate that off-site mitigation or compensation is more appropriate”. We agree that mitigation, compensation and enhancement should be delivered on-site. To maximise the benefit of compensation strategies to nature, any mitigation funding should be directed towards LNRS identified priority sites.</p> <p>In addition, the Local Plan should strengthen policy wording to only permit developments which do not provide onsite green infrastructure if they provide sustainable alternative green infrastructure provision of an equivalent standard in close proximity to the development. Within this section, the policy should include specific wording on the provision of Suitable Alternative Natural Greenspace (SANG) or relevant Strategic Access Management and Monitoring (SAMM) projects and requirements.</p> <p>To ensure a compliant and adequate level of protection for designated sites, the Council must include - and integrate fully - a more detailed policy for the provision of alternative greenspace that is both functional, and of a standard that provides viable habitat alternatives, drawing on SANG and SAMM guidance.</p> <p>We recommend the Council mirror the effective policy wording of other authorities, such as Surrey Heath¹⁹ and Guilford²⁰, to ensure suitable alternative greenspace provision and strategic access management and monitoring mitigation. A failure to do so, given the direct implications of the Plan for protected areas, designated and non-designated sites, risks serious implications for both the soundness and legal compliance of the Plan with regards to the key environmental duties and considerations required.</p>

To address this concerning deficiency, we recommend the following wording:

(1)

Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of a Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. These measures are unlikely to be acceptable unless agreed with Natural England.

(2)

The following principles apply:

a) There is an “exclusion zone” set at 400m linear distance from the SPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposals for other types of development within this zone must undertake Habitats Regulations Assessment to demonstrate that they will not harm the integrity of the SPA.

b) There is a “zone of influence” between 400m and 5km linear distance from the SPA boundary. Where net new residential development is proposed within the zone of influence, avoidance and mitigation measures must be delivered prior to occupation of new dwellings and in perpetuity. Measures must be based on a combination of 1) the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG) and 2) Strategic Access Management and Monitoring (SAMM). c) Residential development of over 50 net new dwellings that falls between five and seven kilometres from the SPA may be required to provide avoidance and mitigation measures. This will be assessed on a case-by-case basis and in consultation with Natural England.

(3) The following principles apply to the provision of SANG:

a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.

b) Developments must fall within the catchment of the SANG that provides avoidance, except developments of fewer than 10 net new residential units.

c) The Council will collect developer contributions towards avoidance and mitigation measures, including SANG (unless bespoke SANG is provided) and SAMM.

d) Developments may secure or provide bespoke SANG. Proposals for new SANGs are unlikely to be acceptable unless agreed by Natural England. Large developments may be required to provide bespoke SANG.

(4) Where further evidence demonstrates that the integrity of the SPA can be protected using different distance thresholds or with alternative measures (including standards of SANG provision different to those set out in this policy), the Council will agree these in consultation with Natural England.

We welcome and support the inclusion of Strategic Policy NE1: Protecting and enhancing Biodiversity and the Natural Environment in the district. In particular, we strongly support the statement that “development will only be permitted where it demonstrates that it will protect and enhance the natural environment and

	<p>biodiversity”. In line with this, development proposals should be evaluated in accordance with the Local Nature Recovery Strategy, with enhancements linked to LNRS priority nature recovery projects. When determining areas within the Ecological Network, the LNRS should be used as a guide.</p> <p>To reflect the District’s commitment to tackling the biodiversity crisis, Strategic Policy NE1 should be amended to remove clause iv “development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration and where a suitable compensation strategy exists” which undermines protection for irreplaceable habitats. Irreplaceable habitats cannot be compensated for and are recognised for their high value and the significant amount of time they take to restore or replace. These habitats should be protected more rigorously under the Local Plan. Public benefit should not be used to override protections for these habitats, which provide valuable ecosystem services which are of significant public benefit in the context of a nature emergency.</p> <p>Within the preamble for this policy, the use of micro nature enhancements such as hedgehog highways and swift bricks are specified as valuable measures to help the Local Plan align with both the NPPF and the council’s nature emergency declaration. However, within the policy wording, these micro nature enhancements are not mentioned.</p> <p>Such measures have significant support from across the industry, notably through the Future Homes Hub ‘Homes for Nature’ commitment, which has seen 21 volume housebuilders, responsible for more than 90,000 homes a year, commit to install a bird nesting brick or box for every new home built, as well as hedgehog highways as standard for every new development taken through planning from September 2024. In addition, home builders are encouraged to incorporate additional features, such as bat roosts, insect bricks and hibernacula. To reflect this wider industry support and mobilisation, we recommend that Policy NE1 is strengthened to incorporate swift boxes, bee bricks and hedgehog highways as standard requirements, in order to support the development industry in what it is already committed to deliver, help fulfil the Council’s nature recovery objectives, and align with its ecological emergency declaration.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (commenting on policies)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed Modifications](#) agreed with Historic England. Additional text added in criterion iv.

[Proposed Modification](#) agreed with Environment Agency in relation to criterion ii and paragraph 7.23.

[Proposed modification](#) agreed with Hampshire County Council in relation to criterion v.

Update to the Habitats Regulations Assessment with an Addendum to reflect representations made by Natural England

Local Plan Reference or document	Policy NE2 Major Commercial, Educational and MOD Establishments in the Countryside (MTRA5)	
Total Number of Representations received	6	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	0
Sound	5	0
Complies with Duty to Cooperate	5	0
<p>Summary of Representations There is widespread support for the policy focusing on promoting economic growth and job creation in the countryside. Some respondents highlight the contributions the policy can make to the local economy. Concerns have been raised about the requirement for site-wide masterplans. Comments were also made on ensuring local communities and stakeholders are involved in the application of the policy.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/23/NE2 ANON-AQTS-3BFT-8 – Crawley Parish Council/4/NE2 ANON-AQTS-32CD-5 – Colden Common Parish Council/16/NE2 ANON-AQTS-32NR-X/4/NE2 ANON-AQTS-32SB-K – Defence Infrastructure Organisation/5/NE2 BHLF-AQTS-328K-1/5/NE2</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Support from the policy from respondents around the contribution to the economy and job creation. • Some concern over the requirement for a site-wide masterplan and the engagement with local consultees in policy implementation. 		

Policy/Evidence base document	NE2
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/23/NE2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE2
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/4/NE2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Crawley Parish Council supports the policy to create opportunities for jobs and enterprise within the countryside. It is important any planning applications on commercial, educational sites involve and engage all stakeholders in the community.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE2
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/16/NE2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE2
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/4/NE2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Sparsholt College supports draft policy NE2 and the acknowledgement given to the importance of educational establishments in the countryside to the district's economic prosperity. In respect of criteria (ii) and the requirement for site wide masterplans, please refer to comments made on Strategic policy D5.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE2
Name of respondent (or client)	Defence Infrastructure Organisation
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/5/NE2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We note that a specific policy has been included within the Plan which is supportive of the retention and development of existing major commercial, educational and MOD establishments that occupy rural locations in the district, where this will help them continue to contribute to the district's economic prosperity. We are supportive of this approach.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	NE2
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/5/NE2
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	It is noted that no changes to this policy have been made and Winchester College continues to support Policy NE2 and the acknowledgement given to the importance of educational establishments in the countryside to the district's economic prosperity (the College campus includes land both within the settlement boundary and in the countryside). In respect to criteria (ii) and the requirement for site wide masterplans, please refer to the objection made on Strategic Policy D5.
What modification(s) are necessary to make the policy legally compliant or sound?	In respect to criteria (ii) and the requirement for site wide masterplans, please refer to the objection made on Strategic Policy D5.
What is your suggested wording or text for the policy?	In respect to criteria (ii) and the requirement for site wide masterplans, please refer to the objection made on Strategic Policy D5.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes 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.

Policy/Evidence base document	NE3
Name of respondent (or client)	E Back
Personal reference number	ANON-AQTS-3BDP-2
Full reference number	ANON-AQTS-3BDP-2/2/NE3
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE3 is not sound as it has not been positively prepared, it is not consistent with national policy and guidance, and it has not been justified through an appropriate evidence base. There is also an error in the Regulation 19 document that results in a policy gap.</p> <p>Specifically, the open space and built facilities standards outlined in Table 1 and Table 2 respectively under policy NE3 are insufficient, do not align with national guidance, and in one case contain "copy and paste" errors.</p> <p>With respect to open space, the proposed standards for Winchester fall significantly short of the standards outlined in national guidance, specifically the Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020). This guidance is based on standards data drawn from one third of local authorities in England and Wales. The averaged standards of these local authorities exceeded the standard (or "benchmark") set out in the guidance, which is 1.6 hectares of space for outdoor sport per 1000 people of which 1.2 hectares are playing pitches. In contrast, the Regulation 19 Local Plan for Winchester sets no specific standard for playing pitches, instead setting a standard of 1.5 hectares per 1000 people for "Parks, Sports and Recreation Grounds" of which 0.75 hectares per 1000 people is for "outdoor sport" (see Table 1 under policy NE3). The difference between the national guidance for outdoor sport provision and the standards set out in Winchester's Regulation 19 document is therefore 0.85 hectares per 1000 people. It is therefore inevitable that implementation of the Regulation 19 Local Plan would result in a significant shortfall of open space for outdoor sport relative to need in Winchester. Furthermore, even by its own standards, Winchester City Council has documented an existing shortfall of sports grounds across the Winchester Town area, as seen in the Open Space Assessment 2022 prepared as part of the evidence base for this Local Plan.</p> <p>With respect to built facilities, the data in the line in Table 2 relating to "sports halls" have been copied and pasted in error from Table 1. The data here are therefore non-sensical and misleading, and the error leaves the Local Plan without a standard for sports hall provision. Also in Table 2, the standard relating to "synthetic turf pitches" does not reflect the current version of the Playing Pitch Strategy (2018) that is part of the evidence base for the Local Plan, which identifies a local need well in excess of the proposed standard. Furthermore, Winchester City Council has itself noted that this strategy is now out-of-date and has</p>

	<p>commissioned a new Playing Pitch Strategy that it has said will be completed in 2025. The standards in Table 2, and policy NE3 more generally, will need to take account of this new evidence. This is particularly important as Winchester Town is seeing significant pressure on synthetic turf pitches currently due to high rates of youth participation in relevant sports and specifically a very rapid growth in demand for (and participation in) girls' and women's football.</p> <p>More generally, as we pointed out in our response to the Local Plan Regulation 18 consultation, additional policy and related site allocations are needed on "planning for longer-term sports and leisure provision". In the Regulation 19 document, there are still no references to spatial planning or land allocation for sport or active recreation, despite the fact that the Local Plan evidence base records deficits in sports grounds and other provision, there is ongoing growth in the city and district population, and there is a need to respond to the evolving demography of the city of Winchester specifically (with many school age children and other young people living here, alongside older and retired populations).</p> <p>The Local Plan should make provision in the city of Winchester (i.e. "Winchester Town" and its periphery) for:</p> <ul style="list-style-type: none"> - A site with multiple pitches for football (i.e. natural grass and 3G/4G artificial turf) and hockey (i.e. a Tiger Turf synthetic surface), to meet the needs identified in the 2018 Playing Pitch Strategy and by local clubs. There are numerous sites around the settlement boundary, some of which were put forward for housing or other development via the SHELAA, which could accommodate such provision. This will become particularly urgent as the city grows, and the sooner land is allocated the better. - Sites for free-to-use facilities with an emphasis on adolescent and youth provision, e.g. multi-use games areas (MUGAs), skate parks, pump tracks. - One or more sites that can accommodate other leisure provision that Winchester lacks, such as: ten-pin bowling, an ice rink, a large wet weather / soft play facility, a larger and more affordable cinema, a lido (outdoor pool) and/or spa facility, and social entertainment. <p>We must proactively plan for local residents to be able to relax and exercise together, as well as planning for housing and employment. The Regulation 19 Local Plan does not address this planning requirement, which is vital to the development of "high quality, well designed places" and to "living well".</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>The open space standards in NE3 Table 1 must be updated to reflect Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020).</p> <p>The built facilities standards in NE3 Table 2 must be checked and corrected. The correct standards/data must be entered for "sports halls". All standards must take account of up-to-date built facilities assessments, including an updated Playing Pitch Strategy. It is vital that such assessments reflect the fact that: the Winchester district is one of the most active in the country with high rates of sporting participation by both adults and children; the need for outdoor sports grounds and playing pitches is rising rapidly due to the growth of women's and girls' football, rugby and cricket; the district's population is projected to grow over the Local Plan period; and the Winchester Town settlement requires enhanced provision for sport due to its roles as the district hub and the County Town.</p>

<p>What is your suggested wording or text for the policy?</p>	<p>The open space standards in NE3 Table 1 must be updated to reflect Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020). The built facilities standards in NE3 Table 2 must be checked and corrected. The correct standards/data must be entered for "sports halls". All standards must take account of up-to-date built facilities assessments, including an updated Playing Pitch Strategy. It is vital that such assessments reflect the fact that: the Winchester district is one of the most active in the country with high rates of sporting participation by both adults and children; the need for outdoor sports grounds and playing pitches is rising rapidly due to the growth of women's and girls' football, rugby and cricket; the district's population is projected to grow over the Local Plan period; and the Winchester Town settlement requires enhanced provision for sport due to its roles as the district hub and the County Town.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE3
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/6/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE3
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/2/NE3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Currently with the population figures used Colden Common barely meet the criteria for open space provision and when population figures are furthermore increased we will not meet the open space standards. Financial contributions towards off site improvements is very concerning and should be defined as when acceptable as having contributing elsewhere will not support villages like Colden Common where transport is needed to access it .
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE3
Name of respondent (or client)	Owen Neal
Personal reference number	ANON-AQTS-329B-S
Full reference number	ANON-AQTS-329B-S/1/NE3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Sport England believes that policy NE3 could be improved to ensure consistency with paragraph 103 of the NPPF. Specifically, under ii) it should make clear that the benefit to the community relates to sport, otherwise there is a risk that the policy allows the loss of sports facilities or playing field to another non-sporting community use which we would not support and is not the intention of paragraph 103 of the NPPF. Under iii), Sport England considers that in order to ensure consistency with paragraph 103, it should be clear that a robust assessment is required to demonstrate that the facility is no longer required.
What modification(s) are necessary to make the policy legally compliant or sound?	Sport England therefore considers that the following modifications should be made: ii) the community benefit to sport from the development outweighs the harm caused by the loss of the facility iii) the facility is no longer required for its purpose or an alternative sports or recreation activity as evidenced by a robust assessment of need.
What is your suggested wording or text for the policy?	Sport England therefore considers that the following modifications should be made: ii) the community benefit to sport from the development outweighs the harm caused by the loss of the facility iii) the facility is no longer required for its purpose or an alternative sports or recreation activity as evidenced by a robust assessment of need.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

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

Policy/Evidence base document	NE3
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/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The College welcomes changes to the draft policy made following Reg 18 consultation in 2022; “The local planning authority will seek improvements in the open space network . . . This will be achieved by new and improved provision, or improving public access for all to existing facilities and educational provision where appropriate.” (emphasis added to show change). For site security and safeguarding reasons, improved public access to the college estate is not appropriate. The addition of “where appropriate” will improve the ‘soundness’ of the 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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE3
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/1/NE3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The current policy wording lacks clarity and contains ambiguity. The term "intergenerational areas" is neither defined in the supporting text nor in the glossary. Moreover, it appears that this requirement is imposed on all developments, which is onerous. A more reasonable approach would be to establish a threshold for the amount of open space that necessitates the inclusion of intergenerational areas.</p> <p>Regarding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), in addition to providing open space within the development, there is potential to incorporate a substantial area of public open space to the north, should the allocation be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>The current policy wording lacks clarity and contains ambiguity. The term "intergenerational areas" is neither defined in the supporting text nor in the glossary. Moreover, it appears that this requirement is imposed on all developments, which is onerous. A more reasonable approach would be to establish a threshold for the amount of open space that necessitates the inclusion of intergenerational areas.</p> <p>Regarding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), in addition to providing open space within the development, there is potential to incorporate a substantial area of public open space to the north, should the allocation be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal.</p>
What is your suggested wording or text for the policy?	<p>The current policy wording lacks clarity and contains ambiguity. The term "intergenerational areas" is neither defined in the supporting text nor in the glossary. Moreover, it appears that this requirement is imposed on all developments, which is onerous. A more reasonable approach would be to establish a threshold for the amount of open space that necessitates the inclusion of intergenerational areas.</p> <p>Regarding the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), in addition to providing open space within the development, there is potential to incorporate a substantial area of public open space to the north, should the allocation be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)

Policy/Evidence base document	NE3
Name of respondent (or client)	Richard Doughty
Personal reference number	ANON-AQTS-32FT-R - New Alresford Town Council
Full reference number	ANON-AQTS-32FT-R - New Alresford Town Council/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We think policies NE3, NE4 and NE6 are relevant to New Alresford. It is necessary to protect and enhance our green and blue infrastructure and protect the River Arle. Any new developments need to meet all the necessary strict guidelines.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE3
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/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Trust supports the Biodiversity and the Natural Environment policies. The Trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individuals' health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE3
Name of respondent (or client)	Andrew Craig
Personal reference number	ANON-AQTS-32ZS-B
Full reference number	ANON-AQTS-32ZS-B/1/NE3
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>For completeness it is important that within the city of Winchester, equal reference is made to the Wards of the city as well as the Parishes within the Local Plan.</p> <p>Policy NE3 is not sound as it has not been positively prepared, it is not consistent with national policy and guidance, and it has not been justified through an appropriate evidence base. There is also an error in the Regulation 19 document that results in a policy gap.</p> <p>Specifically, the open space and built facilities standards outlined in Table 1 and Table 2 respectively under policy NE3 are insufficient, do not align with national guidance.</p> <p>With respect to open space, the proposed standards for Winchester fall significantly short of the standards outlined in national guidance, specifically the Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020). This guidance is based on standards data drawn from one third of local authorities in England and Wales. The averaged standards of these local authorities exceeded the standard (or "benchmark") set out in the guidance, which is 1.6 hectares of space for outdoor sport per 1000 people of which 1.2 hectares are playing pitches. In contrast, the Regulation 19 Local Plan for Winchester sets no specific standard for playing pitches, instead setting a standard of 1.5 hectares per 1000 people for "Parks, Sports and Recreation Grounds" of which 0.75 hectares per 1000 people is for "outdoor sport" (see Table 1 under policy NE3). The difference between the national guidance for outdoor sport provision and the standards set out in Winchester's Regulation 19 document is therefore 0.85 hectares per 1000 people. It is therefore inevitable that implementation of the Regulation 19 Local Plan would result in a significant shortfall of open space for outdoor sport relative to need in Winchester. Furthermore, even by its own standards, Winchester City Council has documented an existing shortfall of sports grounds across the Winchester Town area, as seen in the Open Space Assessment 2022 prepared as part of the evidence base for this Local Plan.</p> <p>With respect to built facilities, the data in the line in Table 2 relating to "sports halls" appear to have been repeated in error from Table 1. The data here is therefore incorrect, and the error leaves the Local Plan without a standard for sports hall provision. Also in Table 2, the standard relating to "synthetic turf pitches" does not reflect the current version of the Playing Pitch Strategy (2018) that is part of the evidence base for the Local Plan, which identifies a local need well in excess of the proposed standard. Winchester City Council</p>

has identified that this strategy is now out-of-date and has commissioned a new Playing Pitch Strategy that will be completed in early 2025. The standards in Table 2, and policy NE3 more generally, will need to take account of this new evidence. This is particularly important as Winchester Town is seeing significant pressure on synthetic turf pitches currently due to high rates of youth participation in relevant sports and specifically a very rapid growth in demand for (and participation in) girls' and women's football, and at a time when changing weather patterns are making grass pitches less usable being more prone to winter flooding. Additional policy and related site allocations are needed on "planning for longer-term sports and leisure provision". In the Regulation 19 document, there are still no references to spatial planning or land allocation for sport or active recreation, despite the fact the Local Plan evidence base records deficits in sports grounds and other provision, and at a time when there is ongoing growth in the city and district population. The Local Plan should make provision in the city of Winchester (i.e. "Winchester Town" and its periphery) for:

-

A site with multiple pitches for football (i.e. natural grass and 3G/4G artificial turf) and hockey (i.e. a Tiger Turf synthetic surface), to meet the needs identified in the 2018 Playing Pitch Strategy and by local clubs. There are numerous sites put forward within the Local Plan and via SHELAA which could accommodate such provision. This will become increasingly urgent as the city grows and requires strategic identification and allocation of land to achieve this from within the development areas by the Council. Other aspects of requirement would include: -

- Sites for free-to-use facilities with an emphasis on adolescent and youth provision, e.g. multi-use games areas (MUGAs), skate parks, pump tracks.
- One or more sites that can accommodate other leisure provision that Winchester lacks, such as: an ice rink, a lido (outdoor pool) and/or spa facility, and boxing centre.

We must proactively plan for local residents to be able to relax and exercise together, as well as planning for housing and employment. The Regulation 19 Local Plan does not address this planning requirement, which is vital to the development of "high-quality, well-designed places" and to "living well".

With multiple large scale development proposals covering a significant area of land within the local plan, Sport Winchester would like to see a clear stated objective that this Local plan will both recover the current shortfall of open space and sport facilities within the Winchester city area, as well as ensuring that the new developments provide the necessary level of additional resource and land allocation needed to deliver developments to the new standards required. This action will require strategic intervention by the Council collaborating closely with community groups to develop the resources needed. The current shortfall recovery element should be clearly documented within the Plan to ensure the Plan has SMART objectives, enabling measurement of success and fulfilment.

NE3 7.28 Where the plan clearly states the need to identify and protect all existing open spaces and sports grounds, these have still not been updated into the WCC Open spaces register, and previous consultation feedback and recommendations to have these clearly listed as Local Green Spaces do not appear to have been actioned. For the integrity of this policy section and the security of these facilities, this listed protection

	<p>must be completed before the plan is submitted. The current updating of the Pitch and Playing Field strategy document (which is in progress) should also totally interface with the Local Plan Policies map, with all sports grounds clearly identified and protected.</p> <p>Furthermore, as and when new developments receive and gain planning permission to proceed, all identified open spaces and sports facilities or grounds should automatically be added to the Open Spaces register and added to the Local Green Space register to ensure they are protected now and for the future. This should also cover any existing sporting facilities currently utilised by the community within all identified development areas – the Sir John Moore Barracks being an excellent example.</p> <p>It is recommended that the Local Plan clearly delineates the different requirements and needs of open space, recreation space and sport space as the current policy is too vague, and non-specific; each element needs a clear definition in order for the requirement to be correctly fulfilled, and to ensure an excess of one does not cause detriment to another.</p> <p>Sport Winchester would recommend reference to the explanations provided by the Fields in Trust guidelines be incorporated within these definitions and become definitions included within Policy NE3.</p> <ul style="list-style-type: none"> • Open Space is readily accessible by all within the locality and typically would be informal outdoor space with no specified usage. • Recreation space is more organised and enables independent utilisation for the localised use of the community on an ad hoc basis, not necessarily for organised activities. Could and should include parkland, parks, skate parks, children’s play areas, and open fields where people can turn up and play. • Sports facilities require a more organised and specified requirement, with careful consideration made to access from a wider area, including visiting teams and officials, parking, changing facilities, elevated levels of usage during days and evenings with such lighting as needed to facilitate, and specifications fit for purpose and aspirations. Such facilities may include the requirements of more than one single development, need to be located strategically to meet a wider city requirement, and may require multiple contributions from more than one development to deliver the requirements.
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>The open space standards in NE3 Table 1 must be updated to reflect Fields In Trust "Guidance for Outdoor Sport and Play" in England (November 2020).</p> <p>The built facilities standards in NE3 Table 2 must be checked and corrected. The correct standards/data must be entered for "sports halls". All standards must take account of up-to-date built facilities assessments, including an updated Playing Pitch Strategy. It is vital that such assessments reflect the fact that: the Winchester district is one of the most active in the country with high rates of sporting participation by both adults and children; the need for outdoor sports grounds and playing pitches is rising rapidly due to the growth of women's and girls' football, rugby and cricket; the district's population is projected to grow over the Local Plan period; and the Winchester Town settlement requires enhanced provision for sport due to its roles as the district hub and the County Town.</p>

What is your suggested wording or text for the policy?	See feedback above regarding suggested amendments to the existing policy and specific corrections to the Policy Tables 1 and 2, and also the need for an updated evidence base to inform further specific amendments in due course including the WCC Open Space register and PPS.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE3
Name of respondent (or client)	Jonathan Marmont
Personal reference number	ANON-AQTS-32ZM-5
Full reference number	ANON-AQTS-32ZM-5/1/NE3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Table 1.</p> <p>I do not believe that allotments should count towards the “Open Space Standards”. These can only be enjoyed by a minority as they are not open to the public and therefore cannot be enjoyed by a majority of local residents.</p> <p>I support the policy viii whereby the original biodiversity value of a site will be taken if deliberate clearing of habitats takes place before the application process.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Remove allotments from consideration as open space.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE3
Name of respondent (or client)	Shirlene Oh
Personal reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
Full reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/1/NE3
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Full response on website Strategic Policy NE1 NE3 NE5 The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies. The Trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individuals' health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Letter (Commenting on policies)

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



Policy/Evidence base document	NE3
Name of respondent (or client)	YMCA Fairthorne Manor Group Philipa Spicer
Personal reference number	BHLF-AQTS-328Y-F
Full reference number	BHLF-AQTS-328Y-F/1/NE3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent notes that the Plan acknowledges that the District does not have enough space for sport and recreation. The Group supports the approach of Policy NE3, but seeks an amendment to this policy to specifically recognise and support the role of enabling forms of development that would (for example) provide new homes on redundant parts of a large site to fund improvement projects on other parts of the wider retained site.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes Form (Table of policies) Letter (commenting on Policies and Evidence Base - includes vision document)) Supporting document 1 (Vision Document) Supporting document 2 (Vision Document)

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

Policy/Evidence base document	NE3
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is welcomed that Natural England's Urban Greening Factor for England is mentioned in NE4 para 7.37, along with the concept of 20 min neighbourhoods in Strategic Policy T1 Sustainable and Active Transport and Travel. We recommend that the 20 minute neighbourhood concept is also referred to under Policy NE3, and NE4 as provision of Green Infrastructure (GI) can play a key role in delivering the objective of Strategic Policy T1.</p> <p>The provision of enhanced GI and sites of nature conservation value can not only help address some of the mental and physical health problems experienced in the Borough's population but can also benefit society in other ways including improvements to local air and water quality, reducing the risk of flooding, alleviating noise levels and aiding climate change adaptation.</p> <p>Natural England recommend the Local Plan sets out policy that links public health and wellbeing to the natural environment and seeks to enhance green infrastructure and ecological connectivity across the Borough that is managed for people and nature.</p>
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?	Yes Letter (Commenting on policies and evidence base)

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

[Email correspondence \(between Officers and NE re: compensatory habitats and SWBGS sites\) Form \(commenting on Air Quality only\)](#)

Policy/Evidence base document	NE3
Name of respondent (or client)	Wates Developments Ltd
Personal reference number	BHLF-AQTS-328X-E
Full reference number	BHLF-AQTS-328X-E/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Wates recognises and supports the inclusion of policy guidance on the amount of open space, and sports/recreation facilities with new development.</p> <p>7.2 Wates notes that the tables set out in support of proposed Policy NE3 are very similar to those of the extant plan, and Policy CP7. This policy is well understood and had been delivered in development across Winchester.</p> <p>7.3 Land to the rear of Thody's has capacity to deliver the open space guidance, even with more houses being included, when development is consented.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	<p>Yes</p> <p>Form (refers to letter) (pdf, 158kb)</p> <p>Letter (commenting on policies and evidence base)</p>

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

Policy/Evidence base document	NE3
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-3286-C
Full reference number	BHLF-AQTS-3286-C/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website</p> <p>Legally compliant Yes</p> <p>Positively prepared Yes</p> <p>Sound Yes</p> <p>Justified Yes</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective Yes</p> <p>Compliant with national policy Yes</p> <p>7.1 Wates recognises and supports the inclusion of policy guidance on the amount of open space, and sports/recreation facilities with new development.</p> <p>7.2 Wates notes that the tables set out in support of proposed Policy NE3 are very similar to those of the extant plan, and Policy CP7. This policy is well understood and had been delivered in development across Winchester.</p> <p>7.3 Land at Brightlands has capacity to exceed the open space guidance, even with more houses being included, when development is consented.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (Commenting on policies)

Policy/Evidence base document	NE3
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-328G-W
Full reference number	BHLF-AQTS-328G-W/1/NE3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website.</p> <p>Legally compliant Yes</p> <p>Positively prepared Yes</p> <p>Sound Yes</p> <p>Justified Yes</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective Yes</p> <p>Compliant with national policy Yes</p> <p>7.1 Wates recognises and supports the inclusion of policy guidance on the amount of open space, and sports/recreation facilities with new development.</p> <p>7.2 Wates notes that the tables set out in support of proposed Policy NE3 are very similar to those of the extant plan, and Policy CP7. This policy is well understood and had been delivered in development across Winchester.</p> <p>7.3 Land at Pudding Farm has capacity to exceed the open space guidance, even with more houses being included, when development is consented.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (Commenting on policies)

Policy/Evidence base document	NE3
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/4/NE3
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>see PDF for mark ups and additional info</p> <p>The County Council welcome the emphasis on retaining existing open space and reactional provision along with the need for adequate provision associated with new development. The County Council also support the commitment to ensure that intergenerational areas are codesigned. The County Council would advise further expansion of the last part of the final sentence, “or the benefit of the development to the community outweighs the harm caused by the loss of the facility” to include how WCC would expect to see the benefits/harms measured or quantified. The County Council would expect a detailed analysis, including the use of Public Health intelligence and information, and consultation exercise carried out.</p>
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? <i>All relevant information related to the specific policy or allocation has already been</i>	<p>Yes</p> <p>Letter (commenting on policies and evidence base)</p>

*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	NE3
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/1/NE3
Legally compliant?	
Sound?	Yes
Complies with duty to co-operate?	
Policy/Document comment	<p>Previous Representation made by Winchester College – Regulation 18 consultation Winchester College objects to the last sentence of the first paragraph of Policy NE3 which requires improved public access for all to existing facilities and educational provision. For site security and safeguarding reasons development proposals within the Winchester College estate are unlikely to be able to provide improved public access as required by the policy. The College therefore requests that the policy is amended as follows (suggested additional text is underlined): “The local planning authority will seek improvements in the open space network . . . This will be achieved by new and improved provision, or improving public access for all to existing facilities and educational provision where appropriate.” WCC Officer Comments in relation to the Regulation 18 consultation Comments Noted. It is recognised that not all amenity space is practicable. ‘As appropriate’ has been added to the Policy. Recommended Response: Add ‘As Appropriate’ to the Policy. Representation made by Winchester College – Regulation 19 consultation Winchester College supports the update made to Policy NE3.</p>
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

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)</p>
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WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to paragraph 7.28 to reflect comments by Hampshire County Council.

Local Plan Reference or document	Policy NE4 Green and Blue Infrastructure	
Total Number of Representations received	17	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	10	2
Sound	7	6
Complies with Duty to Cooperate	9	3
<p>Summary of Representations Overall support for the protection and enhancement of green and blue infrastructure. The majority of representations that refer to Policy NE4 relate to the implementation of the policy, particularly in relation to offsite financial contributions and the monitoring framework. 30% of respondents support the promotion of non-motorised travel with the policy. Suggestions that the Urban Green Factor should be made mandatory in the policy and that green infrastructure standards should be raised. Concern that the policy does not reference cross-border issues in relation to green infrastructure where relevant and engagement that has taken place between key stakeholders.</p>		
<p>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/49/NE4 ANON-AQTS-3BSY-T/62/NE4 ANON-AQTS-32CD-5 - Colden Common Parish Council/36/NE4 ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/8/NE4 ANON-AQTS-32UK-X - Environment Agency/15/NE4 ANON-AQTS-32NR-X/9/NE4 ANON-AQTS-32G7-V/11/NE4 ANON-AQTS-32FT-R - New Alresford Town Council/7/NE4 ANON-AQTS-32N7-3 - Twyford Parish Council/2/NE4 BHLF-AQTS-32EK-E - Test Valley Borough Council/5/NE4 BHLF-AQTS-328Q-7/12/NE4 BHLF-AQTS-3282-8 - Natural England/11/NE4 BHLF-AQTS-3284-A/10/NE4 BHLF-AQTS-328K-1/13/NE4 BHLF-AQTS-32QY-8/8/NE4 BHLF-AQTS-32QQ-Z/9/NE4</p>		

Main issues raised in representations received in regulation 19 consultation

- Support for Policy NE4.
- Whether further details should be provided on the implementation of off-site financial contributions.
- Whether GI standards should be raised to align with other national standards.
- Whether the policy adequately referenced cross border issues or engagement that has taken place with other organisations.

Policy/Evidence base document	NE4
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	<p>The text could usefully acknowledge the role of Scheduled Monuments and Registered Battlefields in the context of green infrastructure.</p> <p>Might reference be made to features of heritage significance? We believe this would be appropriate and enrich the text.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>“Historic parks, Scheduled Monuments, Registered Battlefields and landscape features such as park pales, veteran trees, and sunken lanes; and”</p> <p>“Well-planned green infrastructure should be incorporated into development proposals integrating and building upon the existing green network. It should contribute to high quality development and economic prosperity by making places attractive to residents and businesses and improving the health and well-being of the local and wider community. It should respect and respond to local landscape character, including features of heritage significance, and integrate with sustainable transport and green tourism initiatives, expanding upon existing provision.”</p>
What is your suggested wording or text for the policy?	We suggest the Council consider adding a new supporting paragraph on the relationship between flooding and heritage in support of the second paragraph on page 156. We would be happy to confer if needed and consider this to be a minor modification.
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?	<p>Yes</p> <p>Letter (commenting on policies)</p> <p>Email correspondence (between officers and Historic England)</p>

<p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p><u>Email correspondence (between officers and Historic England re: suggested changes)</u></p>
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Policy/Evidence base document	NE4
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/49/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Plan highlights the importance of green and blue infrastructure and identifies key assets including natural and semi-natural greenspaces such as chalk down lands. The Plan also identifies a deficit in informal greenspaces within the district. The policy provides the framework for seeking to improve the natural environment. These should include the use of verges and 'pocket parks' to create, for example, wildflower meadows so that mini green corridors can be established that also attract insects. The Parish Council supports the policy. Support Policy NE4
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	NE4
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/62/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE4
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/36/NE4
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	NE4 - viii - Concern over allocation of housing in Colden Common. Sewage and surface water flooding in Brambridge and Highbridge enters the Itchen and in conflict with this policy. Solutions should be examined for the policy to be sound.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE4
Name of respondent (or client)	South Downs National Park Authority (SDNPA)
Personal reference number	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)
Full reference number	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/8/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We welcome the illustration of strategic blue and green corridors and spaces in Map 9 which includes the South Downs National Park part of Winchester District. This – along with the policy wording and reference to non-motorised travel routes – will ensure that green infrastructure is considered holistically and beyond planning authority area boundaries. We also support Criterion VII given the references to, and protection and support for the uses of, the South Downs Way, Meon Valley Trail, and Watercross Way. This compliments Policy SD20 (Walking, Cycling & Equestrian Routes) in the Adopted South Downs Local Plan.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Email (Commenting on NE8) Letter (Commenting on policies) Email correspondence (Re policy NE8)

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

Policy/Evidence base document	NE4
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/15/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We are supportive of this policy and commend the reference to green 'and blue' infrastructure, which ensures that the water environment is considered alongside and in addition to the terrestrial environment.
What modification(s) are necessary to make the policy legally compliant or sound?	No modifications necessary.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE4
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/9/NE4
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The policy requires a measurable net gain of green infrastructure in accordance with the categories and standards specified in Policy NE3 (which refers to Tables 1 and 2). These standards relate to increases in population and are more relevant to residential development than institutions such as the College. There is no justification for the provision of a net gain of green infrastructure to meet the needs of students at the College, specifically where proposals for development do not increase the student population.</p> <p>The draft policy seeks to secure a financial contribution to the provision and management of Green Infrastructure (GI) sites where on-site provision is not possible. Further information is needed on what additional GI this would fund and how it would be linked to the proposed development.</p> <p>The requirement for landscaping schemes to incorporate predominantly native planning species (criteria iii) should be considered in the context of climate change. It is suggested that the wording is amended to require native species unless there are appropriate and justified reasons to select non-native species (i.e. the wording used in criteria iii of Policy NE9).</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Clarifications required either within the policy or the supporting text as to precisely what green infrastructure any linked financial contributions would fund and how it would be linked to a proposed 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?	No, I don't want to take part in a hearing session
Have you submitted supporting information?	No

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

Policy/Evidence base document	NE4
Name of respondent (or client)	Bargate Homes
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/11/NE4
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	Bargate Homes support in principle this policy. As per our previous representations, Criterion vii should be reworded such that development will be supported provided it "does not harm" the (identified) disused railway lines. As drafted, the policy requires all developments to actively protect these heritage assets, which is not practical or reasonable; only developments that have a relationship with these features (geographical or otherwise) should be expected to protect these features.
What modification(s) are necessary to make the policy legally compliant or sound?	Refine the policy to acknowledge that only developments that have a relationship with these features should protect disused railway line routes.
What is your suggested wording or text for the policy?	Protect the following disused railway line routes and associated infrastructure including the access routes to them (where relevant), (Bishops Waltham, Meon Valley and Winchester) within the district as shown on the Policies Map, so they are safeguarded for existing, and potential future use as non-motorised travel routes.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE4
Name of respondent (or client)	Richard Doughty
Personal reference number	ANON-AQTS-32FT-R - New Alresford Town Council
Full reference number	ANON-AQTS-32FT-R - New Alresford Town Council/7/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We welcome the policy of protecting and supporting the future use and enhancements for non-motorised travel routes on the Watercress Way (New Alresford to Kingsworthy)
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE4
Name of respondent (or client)	Jamie Matthews .. Clerk
Personal reference number	ANON-AQTS-32N7-3 - Twyford Parish Council
Full reference number	ANON-AQTS-32N7-3 - Twyford Parish Council/2/NE4
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>See previous comments on Policy NE1. Policy NE4 also fails to take into account Policy LHE4 for Green infrastructure in the Twyford Neighbourhood plan. This policy identifies the Itchen Valley as a key green corridor linking to Hockley Golf Course and St Catherines hill in the east. It provides the WDLP with the potential to link this green space to its open land between Compton and South Winchester/ Bushfield, to the field and woods around Otterbourne and to Brambridge and to the SW of Colden Common parish, (part of the Itchen valley). Twyford includes 4km of the Itchen valley, much of it contiguous to the east boundary of the WDLP. WDLP should also refer to this policy and recognise it as an opportunity for integrated and cross boundary action on multiple fronts.</p> <p>As the WDLP makes clear, the Itchen and its valley are nationally and internationally important on ecological grounds and nationally important is landscape. Cross border issues of pollution are dealt with by the WDLP so there can be no question of cross-border issues being beyond the scope of the WDLP.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	NE4 add to 7.32 Key green infrastructures assets in adjoining districts as defined in local and neighbourhood plans will be identified. These include the Itchen Valley east of Compton and Otterbourne, which the Twyford Neighbourhood Plan has identified with Hockley golf course and Twyford Down in TNP LHE1.
What is your suggested wording or text for the policy?	<p>NE4 add to 7.32 Key green infrastructures assets in adjoining districts as defined in local and neighbourhood plans will be identified. These include the Itchen Valley east of Compton and Otterbourne, which the Twyford Neighbourhood Plan has identified with Hockley golf course and Twyford Down in TNP LHE1.</p> <p>Add to NE4: recognise the identification of green infrastructure in adjacent Development plans such as that identified in TNP LHE 1 and work with adjacent to authorities to exploit and enhance these areas, as appropriate.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE4
Name of respondent (or client)	Mary Goodwin
Personal reference number	BHLF-AQTS-32EK-E - Test Valley Borough Council
Full reference number	BHLF-AQTS-32EK-E - Test Valley Borough Council/5/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We welcome the value placed on the rural landscapes and on sustaining and enhancing green and blue infrastructure corridors and provisions (through Policy NE4). This policy recognises the many environmental, ecological, quality of life, climate and other benefits these resources offer. A range of green spaces, long distance walking/cycling routes, rivers and tributaries cross or abut our shared border, which is mainly rural in character. They are valued by our communities and businesses for their ecological, environmental and recreational value.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Form (copy of form - refers to letter) Letter (Commenting on policies)

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

Policy/Evidence base document	NE4
Name of respondent (or client)	Georgina Cox
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/12/NE4
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>The site promoted by Gladman in Otterbourne would meet policy NE4 with its well-planned green infrastructure integrated throughout. Our proposal for the site offers the Woodland Walk in the western part of the site which is connected to the wider development site by a proposed footpath.</p> <p>Further to this the eastern side of the development site can be retained as green and blue infrastructure, there is a PRoW travelling through the green space that offers a larger area of green infrastructure which incorporates the existing areas of greenspace and biodiversity.</p> <p>Gladman ensures developments Green and Blue Infrastructure (GBI) networks are accessible to all and ensures they're multi-functional in promoting healthy and active lifestyles for new residents as well as existing residents in the local community.</p>
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? <i>All relevant information related to the specific policy or allocation has already been</i>	<p>Yes</p> <p>Form (refers to letter)</p> <p>Supporting information (commenting on policies and proposed site)</p>

*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	NE4
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/11/NE4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Natural England welcomes reference to NE GI principles and the Urban Greening Factor. We also welcome specific targets for measurable net of GI that addresses deficits of infrastructure provision, biodiversity enhancement and is linked to policy NE3.</p> <p>The Plan should also outline how new GI and habitat creation will be monitored to ensure that it develops in accordance with any targets identified within the Plan and the stated intention(s) of the GI. This policy is not mentioned under the Local Plan Monitoring Framework section and it is our view this policy would benefit from monitoring.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	<p>Yes</p> <p>Letter (Commenting on policies and evidence base)</p> <p>Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</p> <p>Form (commenting on Air Quality only)</p>

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

Policy/Evidence base document	NE4
Name of respondent (or client)	Andy Key
Personal reference number	BHLF-AQTS-3284-A
Full reference number	BHLF-AQTS-3284-A/10/NE4
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Fails on being positively prepared, effective and consistent with national policy. To address the ambitions laid out in the Transport section, this policy needs to be more explicit about the non-motorised travel routes it describes. Without this it will fail to address national policy and it will not be positively prepared.</p> <p>Currently it fails to take into account the joint work between the city and county councils on developing rural active travel routes; it also fails to take into account the plans and longer-term aims of neighbouring local authorities. All but one of the listed disused railway line routes are all identified as potential active travel routes in the draft District LCWIP, which means they will need to be not just safeguarded but upgraded to provide an all-weather surface and access suitable for walking, cycling and wheeling year-round for utility purposes.</p> <p>For example, the advent of e-bikes means that cycle-commuting from Alresford and the upper Itchen Valley villages to Kings Worthy and Winchester) would be viable for many people, as would commuting from the Meon Valley villages to Wickham and from Wickham to Fareham.</p> <p>The one railway line not currently in the draft Winchester District LCWIP is the Meon Valley Trail, which was missed off the first draft of the LCWIP but is likely to be included in future revisions – not least because the East Hants LCWIP includes a plan to upgrade the Meon Valley line north from West Meon to Alton to an active travel route, so the southern section needs to link with this. At the Wickham end, it links into the Fareham LCWIP.</p> <p>The failure to identify this important link with both the Fareham and East Hampshire LCWIP networks indicates a failure to agree priorities with neighbouring authorities and a failure to deliver effective cross-boundary working.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	To be effective, this section needs to specify that any development near to these lines should show how it will contribute to improving them as active travel routes, not just preserving them.

<p>What is your suggested wording or text for the policy?</p>	<p>“vi. Includes proposals for walking, cycling and equestrian routes provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the district. Where these routes have been identified as active travel routes, the proposals must include upgrading them to a standard suitable for year-round, all-weather use.”</p> <p>Suggest an additional paragraph:</p> <p>“Where routes have been identified as part of the active travel network as outline by the District LCWIP and the county’s wider network plan, proposals must include the upgrading of these routes to allow for safe, efficient all-weather use year-round. This means provision of a smooth, robust all-weather surface, usability for users of mobility aids, and – where possible – appropriate lighting.”</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies) Letter (commenting on policies)</p>

Policy/Evidence base document	NE4
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/13/NE4
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Previous Representation made by Winchester College – Regulation 18 consultation</p> <p>The policy requires a measurable net gain of green infrastructure in accordance with the categories and standards specified in Policy NE3 (which refers to Tables 1 and 2). These standards relate to increases in population and are more relevant to residential development than residential institutions such as the College. There is no justification for the provision of a net gain of green infrastructure to meet the needs of students at the College, specifically where proposals for development do not increase the student population*.</p> <p>The draft policy seeks to secure a financial contribution to the provision and management of Green Infrastructure (GI) sites where on-site provision is not possible. Further information is needed on what additional GI this would fund and how it would be linked to the proposed development. Given the significant costs associated with the mitigation of phosphates and nitrates, the Council should enable the mitigation secured to demonstrate nutrient neutrality to be offset against any requirement for a net gain in GI. The impact on development viability of residential developments is acknowledged by the Council in the reduced requirement for affordable housing, but no such reduction in financial contributions is available for other developments involving a net increase in overnight accommodation.</p> <p>The requirement for landscaping schemes to incorporate predominantly native planting species (criteria iii) should be considered in the context of climate change. It is suggested that the wording is amended to require native species unless there are appropriate and justified reasons to select non-native species (i.e. the wording used in criteria iii of Policy NE9).</p> <p>WCC Officer Comments in relation to the Regulation 18 consultation (Officer comment below relates to the * paragraph above) Comments Noted. A contribution towards Green Infrastructure would only be required if there was an extension to the college.</p> <p>Recommended Response: No Change</p> <p>Other officer comments: Comments Noted. It would only be where there is a proposed extension to the college where a contribution towards Green Infrastructure would be required, if a vacant Greenfield site were to be developed for example.</p> <p>Recommended Response: No Change</p> <p>Further information will be found in the IDP in regard to funding and linkages to the development.</p>

Recommended Response: No Change

Representation made by Winchester College – Regulation 19 consultation

Whilst Winchester College appreciate that clarification from the Council – ‘A contribution towards Green Infrastructure would only be required if there was an extension to the college’ - it is important that the Council recognise that any future extension to the college may not necessarily result in an increase in student population. The College reiterates that the standards in Policy NE3 (which refers to Tables 1 and 2) relate to increases in population and are more relevant to residential development than residential institutions such as the College. There is no justification for the provision of a net gain of green infrastructure to meet the needs of students at the College, specifically where proposals for development do not increase the student population. The draft policy seeks to secure a financial contribution to the provision and management of Green Infrastructure (GI) sites where on-site provision is not possible. It is noted that the Council response on funding refers to further information being found in the IDP. The IDP (August 2024) has been reviewed, and whilst Section 7 outlines the assessment of needs for open spaces and parks (pages 31 and 32), there is not a section on Green Infrastructure which is defined in paragraph 7.30 of the Draft Local Plan ‘The GI network includes five key elements:- spaces, links and features such as parks and gardens (on private or public land), and green links between spaces such as hedgerows and rights of way, green roofs/ walls and ‘blue corridors’ such as rivers and ponds.’ Therefore, it is still not clear what additional GI Policy NE4 is seeking to fund.

The following officer response are also noted in relation to College’s Regulation 18 representation on Policy NE4:

‘In regards to the suggested wording for Criterion v, it is considered that this wording is too specific, as some developments will not have a phasing plan. By stating ‘feasible stage’ this is incorporates phases.

In regards to criterion vii, it is considered that the policy is worded in a way that only development alongside or the access routes will be required to protect disused railway lines.’ (page 18, allocated reference BHLF-KSAR-N8ZV-7)

There appears to be some confusion here as the Council’s response does not relate to the comments the College made in relation to Policy NE4. Winchester College continue to make the following representations that do not appear to have been responded to at the Regulation 18 stage.

Given the significant costs associated with the mitigation of phosphates and nitrates, the Council should enable the mitigation secured to demonstrate nutrient neutrality to be offset against any requirement for a net gain in GI. The impact on development viability of residential developments is acknowledged by the Council in the reduced requirement for affordable housing, but no such reduction in financial contributions is available for other developments involving a net increase in overnight accommodation.

The requirement for landscaping schemes to incorporate predominantly native planning species (criteria ii) should be considered in the context of climate change. It is suggested that the wording is amended to require native species unless there are appropriate and justified reasons to select non-native species (i.e. the wording used in criteria iii of Policy NE9).

What modification(s) are necessary to make the policy legally compliant or sound?	Excellent standard... ‘
What is your suggested wording or text for the policy?	To make the policy sound the wording in Policy NE4 (criteria ii) should be amended to use the wording in criteria iii of Policy NE9.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)

Policy/Evidence base document	NE4
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/8/NE4
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This is a positive policy that sees the maintenance, protection and enhancement of the existing green infrastructure network. This policy recognises the environmental, social and economic value of green infrastructure.</p> <p>5.9 The policy states that financial contributions for off-site GI enhancement could be possible if required but the evidence base is void of information about how this would work. The evidence base requires strengthening with further information on this point.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes</p> <p>Form (refers to letter)</p> <p>Letter (Commenting on policies and evidence base)</p> <p>Supporting information (Map)</p>

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

Policy/Evidence base document	NE4
Name of respondent (or client)	Lorna Selby
Personal reference number	BHLF-AQTS-32QQ-Z
Full reference number	BHLF-AQTS-32QQ-Z/9/NE4
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Ambitious green infrastructure policy is a vital component, particularly in an urban setting, for achieving alignment with the Environment Act's targets, as well as achieving the Levelling Up and Regeneration Act's associated missions, including on public health and pride of place.</p> <p>We welcome reference to green infrastructure in Policy NE4: Green and Blue Infrastructure, which states that the local planning authority will support development proposals that maintain, protect and enhance existing green infrastructure, while providing a measurable green infrastructure net gain.</p> <p>We welcome reference to the national Urban Greening Factor (UGF) within the supporting text of Policy NE4: Green and Blue Infrastructure. We recommend that the Council should integrate a commitment to producing a mandatory Urban Greening Factor within policy wording, to support urban greening in Winchester through new development, in addition to Biodiversity Net Gain, where initial habitat baselines are low. We would recommend that the Council's related planning policy follows the model of the London plan urban greening factor, Policy G5.21 However, given the significant and severe issues of green space and greenery deprivation, in order to address the scale of nature decline and deliver the relevant public health and pride of place outcomes needed, we recommend setting a higher target minimum score than 0.3 for commercial development and 0.4 for residential developments, as well as ensuring it encompasses all types and sizes of development within the city.</p> <p>In order to fully comply with the associated policy directions and support the associated legal targets, we would like to see the Draft Local Plan adapt the green infrastructure policy to set high quality green infrastructure principles across the built footprints of new and existing areas. This would lead to the increased sustainability of developments, boost climate resilience and public wellbeing, as well as increase value, support a resilient economy and desire to live in the area. Therefore, we recommend that the local plan should incorporate reference to the Building with Nature accreditation in Policy NE4: Green and Blue Infrastructure.</p> <p>The accreditation brings together existing guidance and good practice to recognise high-quality green infrastructure where wellbeing, biodiversity and water are core foundations. We recommend that all proposals for green infrastructure will be expected to be designed with the Building with Nature standards, or an</p>

	equivalent standard set by the Council. This will ensure that all green infrastructure is delivering maximum benefits for the health and wellbeing of residents, and for nature's recovery.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (commenting on policies)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to paragraphs 7.32 and 7.34 agreed with Historic England.

[Proposed modification](#) to paragraph 7.35 agreed with Natural England.

Local Plan Reference or document	Policy NE5 Biodiversity	
Total Number of Representations received	23	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	17	0
Sound	14	5
Complies with Duty to Cooperate	17	0
<p>Summary of Representations</p> <p>Support for reiterating the mandatory BNG requirements and protecting and enhancing sites of national and international importance. While there is support for this policy developers and other’s question its feasibility and potential impact on development costs. Some respondents suggest that the mandatory 10% BNG requirement is increased. The Ministry of Defence have expressed the need for assessing off site BNG provision against statutory safeguarding zones.</p> <p>There are concerns around the current monitoring framework for the policy and whether this will be effective in ensuring policy compliance. There are some concerns that the policy does not align with Para 180 of the NPPF and there are suggestions that the policy should be amended to reflect this. Concerns over the policy requirements for the allocated sites such as viability. Some respondents suggest amalgamating policies NE1 and NE5 to ensure succinctness as there is come criticism that there is repetition.</p> <p>Key stakeholders such as Test Valley Borough Council and Portsmouth City Council support the collaborative approach made by the Council in relation to enhancing biodiversity through measures such as the LNRS and mitigating recreational pressure on the Solent. Organisations such as Natural England have referenced the need for the policy to provide further clarification on compensatory habitats, recreational disturbance and the requirements for Functionally Linked Land in relation to designated sites.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BR1-H/2/NE5</p> <p>ANON-AQTS-3BEW-A – Littleton and Harestock Parish Council/20/NE5</p> <p>ANON-AQTS-3BTT-P/1/NE5</p> <p>ANON-AQTS-3BSY-T/30/NE5</p> <p>ANON-AQTS-32CD-5 – Colden Common Parish Council/19/NE5</p> <p>ANON-AQTS-32UM-Z/2/NE5</p> <p>ANON-AQTS-329Q-8/12/NE5</p> <p>ANON-AQTS-32UU-8/2/NE5</p> <p>ANON-AQTS-32U5-8/2/NE5</p> <p>ANON-AQTS-3BQA-Z/6/NE5</p>		

ANON-AQTS-32SB-K – Defence Infrastructure Organisation/6/NE5
ANON-AQTS-32Z7-F – Hampshire Hospitals NHS Foundation Trust/4/NE5
BHLF-AQTS-32EK-E – Test Valley Borough Council/3/NE5
BHLF-AQTS-326A-N/2/NE5
BHLF-AQTS-3265-9 – Hampshire Hospitals NHS Foundation Trust/4/NE5
BHLF-AQTS-32YM-4 – Defence Infrastructure Organisation/2/NE5
BHLF-AQTS-3282-8 – Natural England/7/NE5
BHLF-AQTS-328X-E/7/NE5
BHLF-AQTS-3286-C/7/NE5
BHLF-AQTS-328G-W/7/NE5
BHLF-AQTS-328K-1/6/NE5
BHLF-AQTS-32QY-8/4/NE5
BHLF-AQTS-32QQ-Z/4/NE5
BHLF-AQTS-32Q2-1 – Portsmouth City Council/2/NE5

Main issues raised in representations received in regulation 19 consultation

- Support for mandatory BNG reference but some concerns around viability implications and whether the requirement should be increased.
- Support for collaborative working with neighbouring authorities on enhancing biodiversity and mitigating recreational pressure.
- Whether the policy framework for NE5 is effective
- Whether the policy provides sufficient clarity and whether it aligns with the NPPF.
- Whether further clarification is required for a number of issues linked to the policy such as functionally linked land and recreational pressure on designated sites.
- Whether the policy requirements are likely to have significant implications for the sites allocated in the Local Plan.

Policy/Evidence base document	NE5
Name of respondent (or client)	Lois Gravely
Personal reference number	ANON-AQTS-3BR1-H
Full reference number	ANON-AQTS-3BR1-H/2/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Large areas of Bushfield camp are designated as a SINC. This area needs to be adequately protected in order to protect biodiversity
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
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/20/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy seeks to protect and enhance the biodiversity of the district and will permit development that achieves that. Any assessment of whether a development meets the requirements of the policy will require a full understanding of the biodiversity of a site and the potential to improve it. The Parish Council supports the policy. Support Policy NE5
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Katie Ewers
Personal reference number	ANON-AQTS-3BTT-P
Full reference number	ANON-AQTS-3BTT-P/1/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Covers the topics and opportunities of biodiversity in the Borough well.
What modification(s) are necessary to make the policy legally compliant or sound?	To add in information regarding the Councils District Licence Scheme for Great Crested Newts. Glossary Definition- (to be included in Appendix 3- Local Plan Glossary) District Licensing or DL is used to describe a new approach to authorising developments affecting great crested newts, by focusing conservation efforts where it will create maximum benefit for the species - whilst reducing delays, costs, risks and uncertainty for developers. Winchester City Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England so in this authority an additional licensing option for developers is available that enables new sustainable development whilst also conserving great crested newts (and wider biodiversity).
What is your suggested wording or text for the policy?	Great Crested Newt District Licensing Scheme 7.50 Great Crested Newt District Licensing Scheme 7.51 Winchester City Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England. The associated District Licensing Scheme, which is currently administered and managed by NatureSpace Partnership, and provides an alternative licensing option for developers to address impacts on protected great crested newts by enabling a 'conservation payment' towards high-quality habitat creation and long-term management and monitoring. In the District Licensing Scheme, developers can engage with NatureSpace at the pre-application stage or at the planning application stage. It is based on a great crested newt landscape-scale conservation strategy, which aims to focus the creation of new habitats where they will be of maximum benefit to the species, whilst also reducing risk and uncertainty through the planning process for developers and planning authorities. The strategy results in a range of other biodiversity benefits and contributes towards nature recovery at the landscape scale. Glossary Definition- (to be included in Appendix 3- Local Plan Glossary) District Licensing or DL is used to describe a new approach to authorising developments affecting great crested newts, by focusing conservation efforts where it will create maximum benefit for the species - whilst reducing delays, costs, risks and uncertainty for developers. Winchester City Council holds a Great Crested

	Newt Organisational (or “District”) Licence granted by Natural England so in this authority an additional licensing option for developers is available that enables new sustainable development whilst also conserving great crested newts (and wider biodiversity).
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/30/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	It is essential that all developments preserve or enhance biodiversity.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/19/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
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/2/NE5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Anchor Properties acknowledges the importance of permitting development which maintains, protects and enhances biodiversity, delivering a minimum of 10% net gain. However, notwithstanding this, criteria (i) of the policy should be amended to reflect the requirement of paragraph 180 of the NPPF that sites are protected "in a manner commensurate with their statutory status or identified quality in the development plan".
What modification(s) are necessary to make the policy legally compliant or sound?	Anchor Properties acknowledges the importance of permitting development which maintains, protects and enhances biodiversity, delivering a minimum of 10% net gain. However, notwithstanding this, criteria (i) of the policy should be amended to reflect the requirement of paragraph 180 of the NPPF that sites are protected "in a manner commensurate with their statutory status or identified quality in the development plan".
What is your suggested wording or text for the policy?	'... Protects sites of international and national importance, and local nature conservation sites and SINCS, from inappropriate development in a manner commensurate with their statutory status or identified quality in the development plan (as per paragraph 180 of the NPPF). ...'
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/12/NE5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Bloor Homes acknowledges the importance of permitting development which maintains, protects, and enhances biodiversity. Notwithstanding this, criteria i of the policy should be amended to reflect the requirement of paragraph 180 of the NPPF that sites are protected “in a manner commensurate with their statutory status or identified quality in the development plan”.</p> <p>Criteria iv) should also acknowledge the role of compensation (as a last resort), in order to be compliant with paragraph 186 of the NPPF.</p> <p>It is unclear from the wording of criteria vi) if this is intended to reflect Paragraph 186 b) of the NPPF. If this is the case, the wording of this criteria needs to be clearer such that it more closely reflects this paragraph.</p> <p>As currently drafted the policy is not consistent with national policy and is unsound. It should be amended as follows:</p> <p>Criteria i) Protects sites of international and national importance, and local nature conservation sites and SINCS, from inappropriate development, in a manner commensurate with their statutory status;</p> <p>Criteria iv) New development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, including impacts on functionally linked land. As a last resort, compensation will be considered. Developments within 500 metres of the SPA/Ramsar FLL should produce a Construction Environmental Management Plan (CEMP) to address potential impacts to these habitats during the construction phase.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Bloor Homes acknowledges the importance of permitting development which maintains, protects, and enhances biodiversity. Notwithstanding this, criteria i of the policy should be amended to reflect the requirement of paragraph 180 of the NPPF that sites are protected “in a manner commensurate with their statutory status or identified quality in the development plan”.</p> <p>Criteria iv) should also acknowledge the role of compensation (as a last resort), in order to be compliant with paragraph 186 of the NPPF.</p> <p>It is unclear from the wording of criteria vi) if this is intended to reflect Paragraph 186 b) of the NPPF. If this is the case, the wording of this criteria needs to be clearer such that it more closely reflects this paragraph.</p> <p>As currently drafted the policy is not consistent with national policy and is unsound. It should be amended as follows:</p>

	<p>Criteria i) Protects sites of international and national importance, and local nature conservation sites and SINCS, from inappropriate development, in a manner commensurate with their statutory status;</p> <p>Criteria iv) New development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, including impacts on functionally linked land. As a last resort, compensation will be considered. Developments within 500 metres of the SPA/Ramsar FLL should produce a Construction Environmental Management Plan (CEMP) to address potential impacts to these habitats during the construction phase.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>Bloor Homes acknowledges the importance of permitting development which maintains, protects, and enhances biodiversity. Notwithstanding this, criteria i of the policy should be amended to reflect the requirement of paragraph 180 of the NPPF that sites are protected “in a manner commensurate with their statutory status or identified quality in the development plan”.</p> <p>Criteria iv) should also acknowledge the role of compensation (as a last resort), in order to be compliant with paragraph 186 of the NPPF.</p> <p>It is unclear from the wording of criteria vi) if this is intended to reflect Paragraph 186 b) of the NPPF. If this is the case, the wording of this criteria needs to be clearer such that it more closely reflects this paragraph. As currently drafted the policy is not consistent with national policy and is unsound. It should be amended as follows:</p> <p>Criteria i) Protects sites of international and national importance, and local nature conservation sites and SINCS, from inappropriate development, in a manner commensurate with their statutory status;</p> <p>Criteria iv) New development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, including impacts on functionally linked land. As a last resort, compensation will be considered. Developments within 500 metres of the SPA/Ramsar FLL should produce a Construction Environmental Management Plan (CEMP) to address potential impacts to these habitats during the construction phase.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i></p>	<p>Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)</p>

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Crest Nicholson Partnerships and Strategic Land
Personal reference number	ANON-AQTS-32UU-8
Full reference number	ANON-AQTS-32UU-8/2/NE5
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 already seeks to achieve a minimum of 10% biodiversity net gain in its development proposals and will continue to do so by providing a development proposal with policy compliant biodiversity enhancements whilst protecting surrounding green infrastructure and providing green spaces to enhance the lifestyles of the Whiteley community and contribute to meeting the goals of the Council's Biodiversity Action Plan. The Ecological Impact Assessment submitted with a future planning application will demonstrate how a minimum of 10% biodiversity net gain is to be achieved and how the existing natural environment will be protected with biodiversity enhancements provided where possible.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been</i>	Yes Supporting document 1 (Policy SP1 comments) Supporting document 2 (Policy SP2 comments) Supporting document 3 (Policy CN1 comments) Supporting document 4 (Policy CN3 comments)

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

[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 document	NE5
Name of respondent (or client)	Church Commissioners for England
Personal reference number	ANON-AQTS-32U5-8
Full reference number	ANON-AQTS-32U5-8/2/NE5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy states that it “Protects sites of international, European, and national importance, and local nature conservation sites and SINCS, from inappropriate development”. It should be clarified that those sites that are allocated for development do not constitute inappropriate development under this policy.
What modification(s) are necessary to make the policy legally compliant or sound?	Include clarification that those sites that are allocated for development do not constitute inappropriate development under this policy.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
Name of respondent (or client)	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
Personal reference number	ANON-AQTS-3BQA-Z
Full reference number	ANON-AQTS-3BQA-Z/6/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Bloor supports the approach set out within this chapter of the R19 LP and notes that the proposed development at Manor Parks will retain up to 50% of green space on site and will provide a 10% net gain either on site or also via procurement of credits. Bloor consider that Policy NE5 Biodiversity is lengthy and repetitive with partial duplication of requirements already implied by the introductory text regarding the Environment Act 2021 and obligations to secure 10% measurable net gains in biodiversity. It could therefore be set out more strategically and possibly combined with Policy NE1 to form a single succinct policy covering all natural environments and biodiversity.</p> <p>Bloor consider that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the Governments 2019 BNG Final Impact Assessment (IA). The IA is an examination of the broad costs to the development industry based on a range of assumptions that will not necessarily reflect the type and location of development coming forward and the costs of delivering BNG. In addition, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA. Furthermore, the IA makes no consideration as to the potential reduction in the developable area in order to deliver at least 50% of net gains on site. This is the assumption made in the central estimate and which used in the Council's Viability Appraisal.</p> <p>As expressed by the HBF in using the cost estimate in the IA Bloor consider the Council are underestimating the cost of offsite delivery to meet net gains. The IA applies a cost of £11,000 per offsite credit. This is much lower than current prices in the market which are in the region of: £30-50,000 per Grassland unit; £30-50,000 per Hedgerow unit; £30-50,000 per scrubland unit and; £30-50,000 per individual tree. These costs could also be higher still if there are insufficient credits locally. If credits are bought elsewhere then the spatial risk multiplier in the BNG Metric will increase the number of credits that are required. As such, Bloor, alongside the HBF consider that it is necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG.</p>

<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>In line with the Environment Act 2021, the R19 LP will introduce a formal requirement for a minimum 10% measurable net gain in biodiversity as part of developments (paragraph 7.9). Furthermore, developments which maintain, protect, and enhance biodiversity and the landscape will be supported (paragraph 7.17). Bloor supports the approach set out within this chapter of the R19 LP and notes that the proposed development at Manor Parks will retain up to 50% of green space on site and will provide a 10% net gain either on site or also via procurement of credits. Noting the above, Bloor consider that Policy NE5 Biodiversity is lengthy and repetitive with partial duplication of requirements already implied by the introductory text regarding the Environment Act 2021 and obligations to secure 10% measurable net gains in biodiversity. It could therefore be set out more strategically and possibly combined with Policy NE1 to form a single succinct policy covering all natural environments and biodiversity.</p> <p>Notwithstanding, Bloor’s overall support to deliver 10% BNG, as set out by the HBF in their representations to the WCC R19 LP, it is considered that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the Governments 2019 BNG Final Impact Assessment (IA). The IA is an examination of the broad costs to the development industry based on a range of assumptions that will not necessarily reflect the type and location of development coming forward and the costs of delivering BNG. In addition, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA. Furthermore, the IA makes no consideration as to the potential reduction in the developable area in order to deliver at least 50% of net gains on site. This is the assumption made in the central estimate and which used in the Council’s Viability Appraisal.</p> <p>As expressed by the HBF in using the cost estimate in the IA the Council are underestimating the cost of offsite delivery to meet net gains. The IA applies a cost of £11,000 per offsite credit. This is much lower than current prices in the market which are in the region of: £30-50,000 per Grassland unit; £30-50,000 per Hedgerow unit; £30-50,000 per scrubland unit and; £30-50,000 per individual tree. These costs could also be higher still if there are insufficient credits locally. If credits are bought elsewhere then the spatial risk multiplier in the BNG Metric will increase the number of credits that are required. As such, Bloor, alongside the HBF consider that it is necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>In line with the Environment Act 2021, the R19 LP will introduce a formal requirement for a minimum 10% measurable net gain in biodiversity as part of developments (paragraph 7.9). Furthermore, developments which maintain, protect, and enhance biodiversity and the landscape will be supported (paragraph 7.17).</p>

	<p>Bloor supports the approach set out within this chapter of the R19 LP and notes that the proposed development at Manor Parks will retain up to 50% of green space on site and will provide a 10% net gain either on site or also via procurement of credits. Noting the above, Bloor consider that Policy NE5 Biodiversity is lengthy and repetitive with partial duplication of requirements already implied by the introductory text regarding the Environment Act 2021 and obligations to secure 10% measurable net gains in biodiversity. It could therefore be set out more strategically and possibly combined with Policy NE1 to form a single succinct policy covering all natural environments and biodiversity.</p> <p>Notwithstanding, Bloor’s overall support to deliver 10% BNG, as set out by the HBF in their representations to the WCC R19 LP, it is considered that the cost of meeting BNG has not be fully accounted for given that it appears to have been based on the Governments 2019 BNG Final Impact Assessment (IA). The IA is an examination of the broad costs to the development industry based on a range of assumptions that will not necessarily reflect the type and location of development coming forward and the costs of delivering BNG. In addition, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA. Furthermore, the IA makes no consideration as to the potential reduction in the developable area in order to deliver at least 50% of net gains on site. This is the assumption made in the central estimate and which used in the Council’s Viability Appraisal.</p> <p>As expressed by the HBF in using the cost estimate in the IA the Council are underestimating the cost of offsite delivery to meet net gains. The IA applies a cost of £11,000 per offsite credit. This is much lower than current prices in the market which are in the region of: £30-50,000 per Grassland unit; £30-50,000 per Hedgerow unit; £30-50,000 per scrubland unit and; £30-50,000 per individual tree. These costs could also be higher still if there are insufficient credits locally. If credits are bought elsewhere then the spatial risk multiplier in the BNG Metric will increase the number of credits that are required. As such, Bloor, alongside the HBF consider that it is necessary for the council to update the inputs in the viability assessment to take account of the potentially higher costs relating to BNG.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or</i></p>	<p>Yes Letter (commenting on Policies & Evidence Base) Supporting document 1 (South Winchester Vision Document) Supporting document 2 (Response to the delivery of housing)</p>

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

[Supporting document 3 \(Technical Note 1 - Sustainability & Transport\)](#)

[Supporting document 4 \(Technical Note 2 - Transport Feasibility Report\)](#)

[Supporting document 5 \(Statement of Common Ground between Bloor Homes & Stagecoach \(South\) Ltd\)](#)

Policy/Evidence base document	NE5
Name of respondent (or client)	Defence Infrastructure Organisation
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/6/NE5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	We support the approach within Policy NE1 to enhance and protect the natural environment and biodiversity and note that the supporting text to this policy refers to the Environment Act requirement to deliver a Biodiversity Net Gain of 10%. We note that the supporting text to this policy references the Defra Biodiversity Metric. However we consider that it would also be useful to clarify this within the policy wording.
What modification(s) are necessary to make the policy legally compliant or sound?	The Local Planning Authority will permit development that maintains, protects and enhances biodiversity across the district, delivering a minimum of 10% measurable net gain in biodiversity to be maintained for a period of 30 years in accordance with the Environment Act, as calculated using the Defra Biodiversity Metric.
What is your suggested wording or text for the policy?	The Local Planning Authority will permit development that maintains, protects and enhances biodiversity across the district, delivering a minimum of 10% measurable net gain in biodiversity to be maintained for a period of 30 years in accordance with the Environment Act, as calculated using the Defra Biodiversity Metric.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	NE5
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/4/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE5
Name of respondent (or client)	Mary Goodwin
Personal reference number	BHLF-AQTS-32EK-E - Test Valley Borough Council
Full reference number	BHLF-AQTS-32EK-E - Test Valley Borough Council/3/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We support reference to the ongoing collaborative work with TVBC and other local authorities in the south to mitigate the impacts of recreational pressures upon the sensitive environment of the Solent. This is a key area of joint working, and we are similarly supportive of the Bird Aware scheme in helping to manage recreational pressures and deliver ecological mitigation.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (copy of form - refers to letter) Letter (Commenting on policies)

Policy/Evidence base document	NE5
Name of respondent (or client)	James McAllister-Jones
Personal reference number	BHLF-AQTS-326A-N
Full reference number	BHLF-AQTS-326A-N/2/NE5
Legally compliant?	
Sound?	Yes
Complies with duty to co-operate?	
Policy/Document comment	<p>Biodiversity Net Gain</p> <p>The emerging policy target of 10% BNG is in accordance with Government guidance published in February 2024, which states that "... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain".</p> <p>Thakeham wholly supports the delivery of BNG, and the proposed requirement to deliver a policy that is completely aligned with the Environment Act, which will ensure consistency and avoid confusion.</p> <p>It should be noted that Thakeham is already committed to the delivery of at least 10% biodiversity net gain across all development sites and would support the policy requirement for delivery of 10% biodiversity net gain, to ensure protection and growth of biodiversity across Winchester both now and for the future.</p> <p>Additionally, it is important to recognise that some habitat creation, such as hedgehog highways and swift bricks (both delivered as standard by Thakeham) do not add to the calculation of BNG but make an important contribution to ecology. As such, it is possible to deliver 10% BNG as well as additional ecological enhancements.</p> <p>see additional ifno PDF</p>
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

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies and proposed site) Supporting information (vision document)</p>
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Policy/Evidence base document	NE5
Name of respondent (or client)	Shirlene Oh
Personal reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
Full reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/4/NE5
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Full response on website Strategic Policy NE1 NE3 NE5 The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies. The Trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individuals' health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Letter (Commenting on policies)

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Debbie Baker
Personal reference number	BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation
Full reference number	BHLF-AQTS-32YM-4 - Defence Infrastructure Organisation/2/NE5
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>The proposed Policy NE5 Biodiversity identifies that “The Local Planning Authority will require, in accordance with the Environment Act 2021, development to deliver a minimum of 10% measurable net gain in biodiversity to be maintained for a period of 30 years in accordance with the Environment Act and to the latest Statutory Biodiversity Metric.”</p> <p>The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; the Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.</p> <p>see additional info in PDF</p>
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?	<p>Yes</p> <p>Form (commenting on policies)</p> <p>Supporting information (commenting on policies and safeguarding zones)</p>

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/7/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We have the following comments on the policy supporting text:</p> <p>Page 5 of 15</p> <p>e) Paragraph 7.35 should refer to Itchen having international as well as national designation.</p> <p>f) Paragraph 7.44 Welcome this wording that a strategic approach to air quality management is required, this also should reference strategic assessment of the Plan for impacts from air quality. We have been working with the Council on this aspect, please refer to our further comments on this aspect under the Habitats Regulations Assessment (HRA) subheading above.</p> <p>g) Paragraph 7.48 New Forest Recreational Disturbance. The policy text references that development requiring EIA within the 15km zone will require a project level HRA to assess impacts of new development on the New Forest from increased recreational pressure. Please see our comments on the Plan HRA, it is not clear if the Plan has assessed the allocations meet this criteria. If so, these allocation policies should be updated to include specific reference to the requirement.</p> <p>In the policy itself, point iv should say ensure impacts to functionally linked land are appropriately avoided, mitigated or compensated in line with mitigation hierarchy and will be subject to a HRA. We also advise that this section refers to the SWBGS and that any development coming forward which is likely to impact either directly or indirectly on this network of sites will be required to provide mitigation in line with the SWBGS mitigation guidance.</p> <p>We recommend that this policy also has regard to the forthcoming Test & Itchen compensatory habitat. We have previously advised the Council that the River Meon and the River Dever are being considered as compensatory habitat for Southern Water's Drought Plan, at the point the Drought Order is enacted the compensatory habitat will become designated as the River Itchen Compensatory Habitat SAC and River Test Compensatory Habitat SAC and will be subject to The Conservation of Habitats and Species Regulations (2017) (as amended).</p>

<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (Commenting on policies and evidence base) Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites) Form (commenting on Air Quality only)</p>

Policy/Evidence base document	NE5
Name of respondent (or client)	Wates Developments Ltd
Personal reference number	BHLF-AQTS-328X-E
Full reference number	BHLF-AQTS-328X-E/7/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The concept of Biodiversity Net Gain (BNG) is becoming better understood and since the enactment of the Environment Act 2021, most developments are attuned to demonstrating a 10% net gain as required by that Act from 2024.</p> <p>7.5 This does not mean that the Plan should not seek to encourage developments to secure BNG in excess of the 10% set in the Environmental Act – which of course will be the legal minimum. However, accordingly, any encouragement to demonstrate a net gain in excess of 10% should be subject to a viability assessment. For guidance purposes, biodiversity units generally cost £25,000-£35,000 but the number of dwellings these cater for is very scheme dependent. Government credits are much more expensive again.</p> <p>7.6 Moreover, this cost, along with others concerning sustainable design will need to be monitored on a site-by-site basis to ensure the Council's overall strategy remains deliverable across the plan period. The Council may need to be open to negotiation on such matters to ensure its strategy is delivered. PPG Paragraph 022 (Reference ID: 8-022-20190721) advises that biodiversity net gain can be achieved on-site, off-site or through a combination of both on-site and off-site measures. National guidance does not explicitly state the percentage split between such provision, but Paragraph 023 (Reference ID: 8-023-20190721) confirms that such gains can be delivered entirely on-site or by using off-site gains where necessary.</p> <p>7.8 Land to the rear of Thody's will be able to demonstrate an appropriate net gain in biodiversity.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) (pdf, 158kb) Letter (commenting on policies and evidence base)

Policy/Evidence base document	NE5
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-3286-C
Full reference number	BHLF-AQTS-3286-C/7/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website Legally compliant Yes Positively prepared Yes Sound Yes Justified Yes Compliant with the duty to cooperate Yes Effective Yes Compliant with national policy Yes</p> <p>The concept of Biodiversity Net Gain (BNG) is becoming better understood and since the enactment of the Environment Act 2021, most developments are attuned to demonstrating a 10% net gain as required by that Act from 2024.</p> <p>7.5 This does not mean that the Plan should not seek to encourage developments to secure BNG in excess of the 10% set in the Environmental Act – which of course will be the legal minimum. However, accordingly, any encouragement to demonstrate a net gain in excess of 10% should be subject to a viability assessment. For guidance purposes, biodiversity units generally cost £25,000-£35,000 but the number of dwellings these cater for is very scheme dependent. Government credits are much more expensive again.</p> <p>7.6 Moreover, this cost, along with others concerning sustainable design will need to be monitored on a site-by-site basis to ensure the Council's overall strategy remains deliverable across the plan period. The Council may need to be open to negotiation on such matters to ensure its strategy is delivered.</p> <p>7.7 PPG Paragraph 022 (Reference ID: 8-022-20190721) advises that biodiversity net gain can be achieved on-site, off-site or through a combination of both on-site and off-site measures. National guidance does not explicitly state the percentage split between such provision, but Paragraph 023 (Reference ID: 8- 023-20190721) confirms that such gains can be delivered entirely on-site or by using off-site gains where necessary.</p> <p>7.8 Land at Brightlands will be able to demonstrate an appropriate net gain in biodiversity.</p>
What modification(s) are necessary to make the	

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-328G-W
Full reference number	BHLF-AQTS-328G-W/7/NE5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website.</p> <p>Legally compliant Yes</p> <p>Positively prepared Yes</p> <p>Sound Yes</p> <p>Justified Yes</p> <p>Compliant with the duty to cooperate Yes</p> <p>Effective Yes</p> <p>Compliant with national policy Yes</p> <p>The concept of Biodiversity Net Gain (BNG) is becoming better understood and since the enactment of the Environment Act 2021, most developments are attuned to demonstrating a 10% net gain as required by that Act from 2024.</p> <p>7.5 This does not mean that the Plan should not seek to encourage developments to secure BNG in excess of the 10% set in the Environmental Act – which of course will be the legal minimum. However, accordingly, any encouragement to demonstrate a net gain in excess of 10% should be subject to a viability assessment. For guidance purposes, biodiversity units generally cost £25,000-£35,000 but the number of dwellings these cater for is very scheme dependent. Government credits are much more expensive again.</p> <p>7.6 Moreover, this cost, along with others concerning sustainable design will need to be monitored on a site-by-site basis to ensure the Council's overall strategy remains deliverable across the plan period. The Council may need to be open to negotiation on such matters to ensure its strategy is delivered.</p> <p>7.7 PPG Paragraph 022 (Reference ID: 8-022-20190721) advises that biodiversity net gain can be achieved on-site, off-site or through a combination of both on-site and off-site measures. National guidance does not explicitly state the percentage split between such provision, but Paragraph 023 (Reference ID: 8- 023-20190721) confirms that such gains can be delivered entirely on-site or by using off-site gains where necessary.</p> <p>7.8 Land at Pudding Farm will be able to demonstrate an appropriate net gain in biodiversity.</p>
What modification(s) are necessary to make the	

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/6/NE5
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Policy NE5 has been amended to include the requirement for 'Developments within 500 metres of the SPA/Ramsar FLL should produce a Construction Environmental Management Plan (CEMP)' (point iv). The supporting text to Policy NE5 refers to the HRA which provides information on functionally linked land in relation to the European sites – the potential for FLL within the Plan area has been considered for all Habitat Sites with mobile qualifying species.</p> <p>The policy, as currently drafted, is ambiguous and requires reference to the HRA to understand this policy and identify when a CEMP may or may not be required. It is, therefore not sound for point iv. to be included in Policy NE5.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The policy, as currently drafted, is ambiguous and requires reference to the HRA to understand this policy and identify when a CEMP may or may not be required. It is, therefore not sound for point iv. to be included in Policy NE5.
What is your suggested wording or text for the policy?	Delete point iv from Policy NE5 Biodiversity.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)

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



Policy/Evidence base document	NE5
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/4/NE5
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>It is National Legislation that development is required to deliver 10% Biodiversity Net Gain. The development sector is working with Councils and landowners to make this come to fruition and land needed for biodiversity is often secured and safeguarded via condition or S106. It is unusual to see the explicit reference to national legislation in Development Management Policies and is generally avoided. Reference to National Legislation could appear in supporting text and within definitions but it is inappropriate to have explicit reference to it within policy text.</p> <p>5.11 Furthermore, this policy should provide further clarification around any off-sit delivery of BNG.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	<p>Yes</p> <p>Form (refers to letter)</p> <p>Letter (Commenting on policies and evidence base)</p> <p>Supporting information (Map)</p>

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Lorna Selby
Personal reference number	BHLF-AQTS-32QQ-Z
Full reference number	BHLF-AQTS-32QQ-Z/4/NE5
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>We welcome the inclusion of a mandatory 10% measurable net gain under Policy NE5, in accordance with the Environment Act (2021).</p> <p>However, to ensure that Biodiversity Net Gain truly halts nature's decline and puts it into recovery, we encourage the Council to amend draft Policy NE5: Biodiversity and set a target for development to go above and beyond the Government's 10% minimum Biodiversity Net Gain, instead aiming for at least 20% Biodiversity Net Gain across all new development.</p> <p>Failure to integrate a 20% target risks the Plan's effective alignment with the Environment Act's legal target to halt species decline by 2030, and the enhanced duty within the Act for local authorities to conserve and enhance nature across their functions.²² The original 2018 Defra impact assessment for BNG highlighted that a 10% enhancement would likely be inhibited in practice by a number of factors, including habitat degradation between initial assessment and construction completion, pressures from occupation (such as light and sound pollution) and the possible loss of gains over decades. As such, the impact assessment described 10% as the 'lowest level of net gain that the department could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.'²³ The 2023 State of Nature report has presented evidence of a 16% decline in the average abundance of terrestrial and freshwater species in the UK since 1970 (an earlier 2019 assessment had put the figure at 13%)²⁴.</p> <p>To be commensurate with the scale of the challenge, the Council's nature emergency declaration, and genuinely support progress towards the legal target to halt species decline in the UK by 2030 in the Environment Act 2021, it is imperative the Council follow other LPAs - including Guildford and Worthing²⁵ - and adopt a more widely applicable 20% minimum requirement.²⁶</p> <p>We recommend Kent County Council's assessment (https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf) of the potential effect of a 15% or 20% Biodiversity Net Gain target on the viability of residential-led development in Kent. In summary a shift from 10% to 15% or 20% Biodiversity Net Gain did not materially affect viability in the majority of instances when delivered onsite or offsite. The biggest cost in most cases is to get to the mandatory, minimum 10% Biodiversity Net Gain. The increase to 15% or 20% Biodiversity Net Gain in most cases costs much less and is generally negligible and because the Biodiversity Net Gain costs are low when</p>

	<p>compared to other policy costs, in no cases are they likely to be what renders development unviable. In 2020 Defra reviewed five infrastructure projects and found that the costs for 20% BNG was around just 1% of the capital costs for all but one of these projects.²⁷</p> <p>In addition, concerning research cited by the Green Finance Institute has indicated that a worryingly low percentage of applications could be delivering Biodiversity Net Gain due to abuse of the exemptions.²⁸ Significant non-compliance and failure to deliver Biodiversity Net Gain represents a serious risk to the environmental credentials of the Local Plan and its compliance with the provisions of the Environment Act 2021. To address this abuse, we recommend that the Council follow the example of Guildford in its local plan policy, and insert wording to prevent the abuse of exemptions.²⁹</p> <p>As for green infrastructure as mitigation for new developments, the Council should recognise that meeting the Suitable Accessible Natural Greenspace (SANG) calculations is the minimum requirement and does not fully mitigate potential impacts to all sites of ecological importance. Developments near nature reserves increase the footfall, which third parties have to bear the cost of. These sites for wildlife, whether they are designated or not, will play a key role in the ecological network and upcoming LNRS. Therefore, when assessing the ecological impacts of new development, the Council must go beyond draft Policy NE5: Biodiversity and require a complete appraisal on impacts of both designated and non-designated wildlife sites (e.g. local nature reserves) and sufficient mitigation measures in line with accredited best practise guidance.</p> <p>We would recommend that the draft Policy NE5: Biodiversity should consider recreational impacts and disturbance on both designated and non-designated wildlife sites, which is currently missing from the policy wording. A failure to fully consider non-designated sites risks environmental damage to key nature recovery sites, potentially conflicting with the priorities to be outlined in the Local Nature Recovery Strategy.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information?</p>	<p>Yes Form (refers to letter) Letter (commenting on policies)</p>

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

Policy/Evidence base document	NE5
Name of respondent (or client)	Tom Bell
Personal reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council
Full reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council/2/NE5
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	PCC supports the position set out in Policy NE5 of the emerging Winchester Local Plan, which outlines the efforts to maintain, protect and enhance biodiversity within the District, working in partnership with neighboring authorities. PCC is keen to work with WCC and other partners including the Natural England on delivering an appropriate response to protecting and enhancing biodiversity in partnership with the other Districts, and Boroughs and the County Council in Hampshire through the Local Nature Recovery Strategy.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to criterion iv and paragraphs 7.44 and 7.45 to be agreed with Natural England.

Local Plan Reference or document	Policy NE6 Flooding, Flood Risk and the Water Environment	
Total Number of Representations received	12	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	7	2
Sound	4	5
Complies with Duty to Cooperate	7	2
<p>Summary of Representations</p> <p>26% of respondents support the policy in relation to protecting natural habitats. Respondents criticise the lack of reference in the policy to the SFRA and the methodology in assessing flood risk in Winchester. Concern that the policy does not meet the requirements of the NPPF. There are also concerns that the policy does not provide enough clarity as currently drafted. The majority of responses highlight the need for SuDS across all developments. A number of responses stress the need to prevent surface water from connecting to the foul drainage network to reduce the risk of pollution. In addition, there is criticism in relation to the lack of reference to guidelines in relation to sustainable drainage principles such as the CIRIA guidance.</p> <p>Respondents stress the need for the engagement between developers and infrastructure providers to address capacity constraints and ensure infrastructure supports sustainable development. Concern that the policy does not address a solution for surface water and sewerage flooding at Brambridge.</p> <p>Recommendations from organisations such the Environment Agency in relation to the loss of floodplain storage capacity and flood flow routes.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-32U8-B/Historic England (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p>ANON-AQTS-3BSY-T/49/NE6</p> <p>ANON-AQTS-327N-3/2/NE6</p> <p>ANON-AQTS-32CD-5 - Colden Common Parish Council/28/NE6</p> <p>ANON-AQTS-32UK-X - Environment Agency/13/NE6</p> <p>ANON-AQTS-329Q-8/21/NE6, ANON-AQTS-3BQA-Z/11/NE6</p> <p>ANON-AQTS-327U-A - Southern Water/20/NE6</p> <p>ANON-AQTS-32FT-R - New Alresford Town Council/5/NE6</p> <p>BHLF-AQTS-328Q-7/7/NE6</p> <p>BHLF-AQTS-3282-8 - Natural England/10/NE6</p> <p>ANON-AQTS-32NV-2 - Sparsholt Parish Council</p> <p>BHLF-AQTS-32QQ-Z/7/NE6</p>		

Main issues raised in representations received in regulation 19 consultation

- Whether the SFRA adequately assessed flood risk in Winchester.
- Whether the policy meets the NPPF and provides sufficiently clarity to ensure effective implementation.
- Whether the policy provides sufficient guidelines to sustainable drainage principles.
- Whether the policy should apply SuDS across all developments.
- Whether the policy addresses ongoing engagement with key organisations such as Southern Water.

Policy/Evidence base document	NE6
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	We suggest the Council consider adding a new supporting paragraph on the relationship between flooding and heritage in support of the second paragraph on page 156. We would be happy to confer if needed and consider this to be a minor modification.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Email correspondence (between officers and Historic England) Email correspondence (between officers and Historic England re: suggested changes)

Policy/Evidence base document	NE6
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/49/NE6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE6
Name of respondent (or client)	Winchester Action on the Climate Crisis (WinACC)
Personal reference number	ANON-AQTS-327N-3
Full reference number	ANON-AQTS-327N-3/2/NE6
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE6 is unsound due to its inconsistency with NPPF Chapter 14, Paragraphs 167 and 168, regarding managing flood risk and addressing future climate and nature challenges.</p> <p>The policy does not provide adequate safeguards for managing current and future flood risks, prevention of pollution incidents particularly when set against the increasingly unpredictable environmental conditions with increasing intense levels of rainfall created by climate change including the inadequate resilient water management infrastructure and flood prevention techniques.</p> <p>Winchester District is already prone to frequent flooding, worsened by ineffective waste and surface water infrastructure and rising groundwater levels. Flooding is a growing risk to communities, nature and infrastructure including general community and economic wellbeing without robust mitigating and prevention measures.</p> <p>Relying solely on statutory consultees for flood risk assessments for planning applications is no longer acceptable given the inclination to be over optimistic with risk assessments set against the repetition of flood events due to legacy infrastructure failures and inadequate mitigation for new developments. The lagging government regulations and shortage of solution funding to fully address the increasing hydraulic load and pollution risks to infrastructure in an already degraded natural and built environment is no longer sustainable. The damage to nature is unacceptable in view of recent worsening UK State of Nature reports and wider nature crisis.</p> <p>The policy's lack of mandatory measures for the above including for Sustainable Urban Drainage Systems (SuDS) for developments smaller than 10 properties neglects important flood risk mitigation strategies amongst other options to reduce the increasing hydraulic load to water management systems and the harm to the environment and communities. This is totally unsustainable.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The policy requires stronger protective, mitigation and adaptation measures to prevent infrastructure being overwhelmed and harm to our natural environment from the increasing water load to an already over stressed water management and highways systems plus natural ecosystems.

<p>What is your suggested wording or text for the policy?</p>	<p>Flood Risk: "The Local Planning Authority (LPA) will only permit developments that avoid flood risk to people and property and that comply with the best available techniques to prevent excessive hydraulic load on local water and waste management systems plus the natural environment. This is in both known current flood-prone and non-flood prone areas.</p> <p>Requirements:</p> <p>"SuDS or equivalent, rainwater, and greywater harvesting systems are mandatory for all new developments (irrespective of number of buildings) and significant retrofit projects."</p> <p>"Secondary and tertiary systems, such as reed beds, rain gardens or other appropriate equivalent Nature-Based Solutions (NbS) are mandatory where there is high flood risk from treated or untreated wastewater entering sensitive receptor sites e.g., SSSIs, water bodies and other protected areas. This requirement derisks the risk of harm through malfunctioning and overload of grid and off-grid treatment plants or sub-optimal infrastructure.</p> <p>"Other measures for surface water protective measures must consider networks of suitable vegetated areas, green roofs, swales, ponds including natural aquifer blocks to eliminate water runoff risks".</p> <p>"Sustainable surface water management plans must be adopted to ensure regular maintenance and cleaning routines especially for SuDS receptors or equivalent. SuDS should be adopted by sewerage undertakers and/or highways authority or equivalent to guarantee perpetual maintenance and optimal functioning."</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE6
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/28/NE6
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	NE6 - ii, iii, ix Whilst we support the policy. Until it is confirmed that a solution is possible for the surface water and sewage flooding at Brambridge policy SP2 (allocation of housing in Colden Common) is not sound.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE6
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/13/NE6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We are pleased to see that our comments at the Regulation 18 consultation have been taken onboard. We would recommend one addition to the list of matters to comply with: "Ensures there is no net loss of floodplain storage capacity or obstruction to flood flow routes;"
What modification(s) are necessary to make the policy legally compliant or sound?	We are pleased to see that our comments at the Regulation 18 consultation have been taken onboard. We would recommend one addition to the list of matters to comply with: "Ensures there is no net loss of floodplain storage capacity or obstruction to flood flow routes;"
What is your suggested wording or text for the policy?	We are pleased to see that our comments at the Regulation 18 consultation have been taken onboard. We would recommend one addition to the list of matters to comply with: "Ensures there is no net loss of floodplain storage capacity or obstruction to flood flow routes;"
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE6
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/21/NE6
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Criteria i) of draft Policy NE6 seeks to require the Sequential Test in all cases, and the Exceptions Test if required. The NPPF is clear that the Sequential Test is not required to be undertaken on allocated sites where this test has already been carried out. Furthermore, Government guidance outline further examples where the sequential test is not required.</p> <p>Furthermore, the draft policy and supporting text should make reference to the Strategic Flood Risk Assessment, Strategic Flood Risk Assessment Level 2 and Flood Risk Sequential and Exception Test Statement to confirm the council's approach to flood risk and the allocation of sites for development. In addition, Bloor Homes consider further detail should be included in Policy NE6 regarding sustainable drainage principles that are expected to be considered.</p> <p>As currently worded, the draft policy is not consistent with national policy and is unsound. It should be amended as follows:</p> <p>i. Applies a Sequential Test to the location, in line with the NPPF and associated flood risk assessment guidance, and the Exception Test if required, and applying the sequential approach at the site level6;</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Criteria i) of draft Policy NE6 seeks to require the Sequential Test in all cases, and the Exceptions Test if required. The NPPF is clear that the Sequential Test is not required to be undertaken on allocated sites where this test has already been carried out. Furthermore, Government guidance outline further examples where the sequential test is not required.</p> <p>Furthermore, the draft policy and supporting text should make reference to the Strategic Flood Risk Assessment, Strategic Flood Risk Assessment Level 2 and Flood Risk Sequential and Exception Test Statement to confirm the council's approach to flood risk and the allocation of sites for development. In addition, Bloor Homes consider further detail should be included in Policy NE6 regarding sustainable drainage principles that are expected to be considered.</p> <p>As currently worded, the draft policy is not consistent with national policy and is unsound. It should be amended as follows:</p> <p>i. Applies a Sequential Test to the location, in line with the NPPF and associated flood risk assessment guidance, and the Exception Test if required, and applying the sequential approach at the site level6;</p>

<p>What is your suggested wording or text for the policy?</p>	<p>Criteria i) of draft Policy NE6 seeks to require the Sequential Test in all cases, and the Exceptions Test if required. The NPPF is clear that the Sequential Test is not required to be undertaken on allocated sites where this test has already been carried out. Furthermore, Government guidance outline further examples where the sequential test is not required.</p> <p>Furthermore, the draft policy and supporting text should make reference to the Strategic Flood Risk Assessment, Strategic Flood Risk Assessment Level 2 and Flood Risk Sequential and Exception Test Statement to confirm the council's approach to flood risk and the allocation of sites for development. In addition, Bloor Homes consider further detail should be included in Policy NE6 regarding sustainable drainage principles that are expected to be considered.</p> <p>As currently worded, the draft policy is not consistent with national policy and is unsound. It should be amended as follows:</p> <p>i. Applies a Sequential Test to the location, in line with the NPPF and associated flood risk assessment guidance, and the Exception Test if required, and applying the sequential approach at the site level6;</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)</p>

Policy/Evidence base document	NE6
Name of respondent (or client)	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
Personal reference number	ANON-AQTS-3BQA-Z
Full reference number	ANON-AQTS-3BQA-Z/11/NE6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor raise a number of concerns with R19 LP Policy NE6 Flooding, Flood Risk and the Water Environment, as while the policy reflects the NPPF, it has very high-level wording that would be difficult to enforce. Paragraph 7.59 refers to the sequential approach but contains no reference to the SFRA or similar document to confirm the methodology to apply such sequential approach and therefore embed these methodologies in policy. Furthermore, policy NE6 would benefit from more specific standards for sustainable drainage, such as preference for infiltration where possible or clear betterment requirements for brownfield sites. For example, many Local Plans now contain standards that a 50% reduction in runoff from brownfield sites is a requirement.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor raise a number of concerns with R19 LP Policy NE6 Flooding, Flood Risk and the Water Environment, as while the policy reflects the NPPF, it has very high-level wording that would be difficult to enforce. Paragraph 7.59 refers to the sequential approach but contains no reference to the SFRA or similar document to confirm the methodology to apply such sequential approach and therefore embed these methodologies in policy. Furthermore, policy NE6 would benefit from more specific standards for sustainable drainage, such as preference for infiltration where possible or clear betterment requirements for brownfield sites. For example, many Local Plans now contain standards that a 50% reduction in runoff from brownfield sites is a requirement.</p>
What is your suggested wording or text for the policy?	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor raise a number of concerns with R19 LP Policy NE6 Flooding, Flood Risk and the Water Environment, as while the policy reflects the NPPF, it has very high-level wording that would be difficult to enforce. Paragraph 7.59 refers to the sequential approach but contains no reference to the SFRA or similar document to confirm the methodology to apply such sequential approach and therefore embed these methodologies in policy. Furthermore, policy NE6 would benefit from more specific standards for sustainable drainage, such as</p>

	<p>preference for infiltration where possible or clear betterment requirements for brownfield sites. For example, many Local Plans now contain standards that a 50% reduction in runoff from brownfield sites is a requirement.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p>Letter (commenting on Policies & Evidence Base)</p> <p>Supporting document 1 (South Winchester Vision Document)</p> <p>Supporting document 2 (Response to the delivery of housing)</p> <p>Supporting document 3 (Technical Note 1 - Sustainability & Transport)</p> <p>Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</p> <p>Supporting document 5 (Statement of Common Ground between Bloor Homes & Stagecoach (South) Ltd)</p>

Policy/Evidence base document	NE6
Name of respondent (or client)	Ryan Patrick Lownds
Personal reference number	ANON-AQTS-327U-A - Southern Water
Full reference number	ANON-AQTS-327U-A - Southern Water/20/NE6
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>NE6 Flooding, Flood Risk and the Water Environment</p> <p>Southern Water supports this policy, in particular criterion v) which relates to SuDS, as we believe this should be a requirement for all new development. Whilst some parts of the sewer network were originally designed to accommodate surface water, the expansion of towns and cities, in particular of 'urban creep' can exacerbate capacity issues. As stated in Water UK's 21st Century Drainage Programme; "The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems'. Therefore any areas utilised for SuDS should be safeguarded from future alterations or development that would impede their effectiveness.</p> <p>In terms of flood risk, better rainwater management is key to achieving not only a reduced risk of flooding, but also a reduction in storm overflow releases and reduced demand on water resources. To help achieve this, Southern Water supports policies that prioritise on-site surface water management through effective SuDS provision, but would also recommend a requirement that development is not permitted to connect surface water into the foul or combined network unless all other alternatives have been fully and demonstrably investigated. Unless or until Schedule 3 of the Flood and Water Management Act 2010 is enacted, we cannot refuse applications to connect surface water to the combined network. If flooding occurs due to excessive prolonged rainfall, a policy to prevent surface water from being connected to the foul/combined network will help reduce the risk that flood water is contaminated with wastewater, thereby reducing the risk of pollution.</p> <p>In regard to the follow wording -</p> <p>7.55 It is important that there is adequate capacity both on and off the site to serve a development and that it would not lead to problems for existing users. Where there is a capacity problem and no improvements are programmed by the water company, the council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.</p> <p>A developer would not be permitted to undertake work on Southern Water infrastructure, water companies will assess capacity in relation to proposed development during the planning process and any capacity</p>

	<p>constraints will be managed through the regulatory funding mechanism for the reinforcement of the network; currently that mechanism is the Infrastructure Charge.</p> <p>We therefore propose the following change to the wording of 7.55.</p> <p>7.55 It is important that there is adequate capacity both on and off the site to serve a development and that it would not lead to problems for existing users. Where there is a capacity constraint on the main public water or wastewater network, we encourage a developer to work closely with the service provider on the delivery of the required network reinforcement, this is to ensure that there is no detriment to the operation of the network caused by the wastewater flows or water consumption from the dwellings. The work should be completed prior to the occupation of the development and phasing the occupation may be required in tandem with the delivery of the work.</p> <p>We welcome the policy criterion below.</p> <p>vi. Is located at a sufficient distance from existing wastewater treatment works to allow adequate odour dispersion, or takes appropriate odour control measures;</p> <p>Supporting Text:</p> <p>Southern Water endeavours to operate its sewage and sludge treatment works efficiently and in accordance with best practice to prevent pollution. However, unpleasant odours inevitably arise as a result of the treatment processes that occur. New development must be adequately separated from WTWs to safeguard the amenity of future occupiers. This is in line with paragraph 191 of the National Planning Policy Framework (NPPF, 2023), which states that 'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on [...] living conditions' and Paragraph 193 which states 'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities [...] Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.'</p> <p>In addition, paragraph 7.6.5 of the Kent Waste & Minerals Local Plan 2016 (p106) states that 'certain types of development which require a high quality amenity environment (e.g. residential) may not always be compatible with [...] waste management activities which are industrial in nature.' Policy DM 8 further stipulates ' Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>In regard to the follow wording -</p> <p>7.55 It is important that there is adequate capacity both on and off the site to serve a development and that it would not lead to problems for existing users. Where there is a capacity problem and no improvements are programmed by the water company, the council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.</p>

	<p>A developer would not be permitted to undertake work on Southern Water infrastructure, water companies will assess capacity in relation to proposed development during the planning process and any capacity constraints will be managed through the regulatory funding mechanism for the reinforcement of the network; currently that mechanism is the Infrastructure Charge.</p> <p>We therefore propose the following change to the wording of 7.55.</p> <p>7.55 It is important that there is adequate capacity both on and off the site to serve a development and that it would not lead to problems for existing users. Where there is a capacity constraint on the main public water or wastewater network, we encourage a developer to work closely with the service provider on the delivery of the required network reinforcement, this is to ensure that there is no detriment to the operation of the network caused by the wastewater flows or water consumption from the dwellings. The work should be completed prior to the occupation of the development and phasing the occupation may be required in tandem with the delivery of the work.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>7.55 It is important that there is adequate capacity both on and off the site to serve a development and that it would not lead to problems for existing users. Where there is a capacity constraint on the main public water or wastewater network, we encourage a developer to work closely with the service provider on the delivery of the required network reinforcement, this is to ensure that there is no detriment to the operation of the network caused by the wastewater flows or water consumption from the dwellings. The work should be completed prior to the occupation of the development and phasing the occupation may be required in tandem with the delivery of the work.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>No, I don't want to take part in a hearing session</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Supporting Document (Commenting on policies)</p>

Policy/Evidence base document	NE6
Name of respondent (or client)	Richard Doughty
Personal reference number	ANON-AQTS-32FT-R - New Alresford Town Council
Full reference number	ANON-AQTS-32FT-R - New Alresford Town Council/5/NE6
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	We encourage the local planning authority to consider additional relevant evidence of flooding on sites beyond that shown on EA flood mapping particularly as the effects of the climate emergency are likely to exacerbate existing flooding issues. We ask that the Plan include the requirement of a flood risk assessment for all sites on the floodplain.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE6
Name of respondent (or client)	Georgina Cox
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/7/NE6
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Gladman supports policy NE6 and its requirement for new development to appropriately manage flood risk and ensure it's not directed elsewhere. The site in Otterbourne will incorporate a sustainable urban drainage system with the inclusion of an attenuation pond in the northeastern corner of the site. The attenuation pond allows run off water to be stored in times of peak rainfall to reduce the risk of flooding.</p> <p>The SuDs features incorporated into the site's design will create new habitats and enhance existing ones in turn further increasing the biodiversity net gain on the site.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Form (refers to letter) Supporting information (commenting on policies and proposed site)

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

Policy/Evidence base document	NE6
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/10/NE6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	In our Regulation 18 response we advised that this policy should be strengthened to require sustainable drainage systems (SuDS) features to be incorporated into development in order to prevent pollution to the River Itchen SAC from surface water run-off. Supporting text could also reference relevant Ciria guidance for the design of SuDS treatment trains to reduce nutrient enrichment and that an extra treatment train should be considered if development drains to a protected site. This policy should be linked to policy NE4, NE16 and NE17.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (Commenting on policies and evidence base) Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites) Form (commenting on Air Quality only)

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

Policy/Evidence base document	NE6
Name of respondent (or client)	Lorna Selby
Personal reference number	BHLF-AQTS-32QQ-Z
Full reference number	BHLF-AQTS-32QQ-Z/7/NE6
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>We welcome and strongly support the inclusion of nutrient neutrality in Policy NE16: Water Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent and the River Itchen. We welcome the emphasis on the mitigation hierarchy, by first only granting permission where effects on nutrients can be excluded, and if that is not possible, opting for mitigation via nutrient neutrality. We also support the local delivery mechanisms outlined in this policy, with reference to the Local Nature Recovery Network.</p> <p>However, in order to fully address the scale of the problem and support the Council's wider goals for putting nature into recovery, we would recommend that the policy goes further and integrates a strong preference for nitrate mitigation schemes that will deliver wider environmental benefits, especially for biodiversity. The “stacking” of nutrient and Biodiversity Net Gain benefits offers a valuable route to deliver this. The opportunities for the creation and improvement of habitats, as part of mitigation proposals, should be as identified through the Government’s forthcoming Nature Recovery Network and the Local Nature Recovery Strategy.</p> <p>Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver Biodiversity Net Gain and mitigation for nitrates, prioritising significant added value. We are currently one of the only organisations delivering an established nitrates mitigation programme and provide other nature-based solutions services. We would be pleased to discuss these in more detail. No rivers are currently achieving good chemical status in England and only 14% of designated rivers are meeting ‘good’ ecological status.³⁰ Water quality remains a significant issue of concern locally, with the chemical status of the Itchen defined as failing due to priority hazardous substances, with high pollution deriving from treated wastewater, storm water and privately owned sewage treatment works. In 2023, the Harestock wastewater treatment work owned by Southern Water spilled 10 times for a total of 109.44 hours, discharging into the River Itchen.</p> <p>This is indicative of the current state of play with our water and drainage infrastructure that frequently fails, and which is unable to meet existing requirements or adhere to licensed conditions. Given the current lack of confidence in effective and timely investment in our critical water infrastructure, this plan must ensure that it does not add further to the acute pressures faced by the district’s water environment.</p>

	<p>We welcome key elements within Policy NE6: Flooding, Flood Risk and the Water Environment including the use of drainage to account for a changing climate and the use of SuDs in new developments. However, draft policies do not go far enough to achieve sufficient safeguards for water-based habitats and ecosystems. We strongly recommend that Policy NE17: Rivers, watercourses and their settings is amended to provide more detail on the protection and enhancement of rivers that new developments must meet. This should include an initial emphasis on prohibiting new development that is within or adjacent to river corridors and their tributaries. Development in the riparian environment is not sustainable and contributes to the existing issues facing our river systems, further reducing their capacity to provide valuable ecosystem services. This will be an essential tool in combatting climate change.</p> <p>A well-functioning floodplain and associated habitats are integral to the sustainable management of water resources, water quality, flooding and building in climate resilience, particularly in the face of climate change, extreme weather and sea level rise. Where development in a riparian setting is fundamentally unavoidable, we suggest the following additions to Policy NE17:</p> <ul style="list-style-type: none"> vii. Include natural Buffers (minimum 20m) to prevent incidents of polluting run-off and protect biodiversity. As recommended by Natural England³¹, this buffer-zone should be increased to 50-100 metres across vulnerable habitats, including chalk streams. viii. Marginal vegetation and the ecological value of the area including its role as an ecological network; xi. Aquatic and riparian vegetation of the river environment; x. The varying size and associated habitats within a corridor which, in order to avoid uncertainty, are defined as the habitats immediately surrounding the waterbody that contribute toward its character and ecology including but not exhaustively flood plains, water meadows, wet woodland, reedbeds, fens, mires, bankside vegetation and other smaller waterbodies within close proximity and/or sharing the same topography and geology. Our research has suggested buffer strips of 8 metres near rivers are not sufficient, and we recommend a minimum of 20 metres to prevent incidents of polluting run-off and protect biodiversity. As recommended by Natural England³², this buffer-zone should be increased to 50-100 metres across vulnerable habitats, including chalk streams like the River Itchen. <p>We welcome the inclusion of the Solent Waders and Brent Goose Strategy as a key point of reference in Policy NE17: Rivers, watercourses and their settings. It is crucial that the recommendations and key guidance within this strategy are properly and systematically reflected across the strategic allocations and sites within the plan. Particularly to ensure plans and measures are based on a spatial analysis of three years of up-to-date field survey data, and that the relevant mitigation best practice, as recommended within the Strategy, is followed.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	

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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (commenting on policies)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to paragraph 7.55 as agreed with Southern Water.

Updated [Statement of Common Ground with Southern Water](#) to reflect Regulation 19 representations.

[Proposed modification](#) to supporting text to include new paragraph as agreed with Historic England.

[Proposed modifications](#) to criterion viii as agreed with the Environment Agency

Local Plan Reference or document	Policy NE7 Settlement Gaps	
Total Number of Representations received	36	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	19	9
Sound	12	17
Complies with Duty to Cooperate	19	9
<p>Summary of Representations Support Policy NE7 and the inclusion of a gap between;</p> <ul style="list-style-type: none"> • Winchester and Littleton • the 6000 dwelling development at Welborne (in the borough of Fareham) and the settlements of Wickham and Knowle • Otterbourne-Southdown • Kings Worthy, Headbourne Worthy and Abbots Worthy • Denmead and Waterlooville <p>Request for the policy to be deleted as it does not support the principle of meeting housing needs and the unmet needs of PfSH.</p> <p>Request for a settlement gap between Olivers Battery/ Badger Farm Road to Compton/Hursley. Request from Sparsholt Parish Council for a settlement gap at Sparsholt.</p> <p>Request for the Otterbourne-Southdown Gap to be removed, or reduced to only include the woodland east of Otterbourne Road. Request removal of Land at Pudding Farm could be removed from the Winchester – Kings Worthy/Headbourne Worthy Gap, without it having any material effect on the role of the Gap.</p> <p>Object to the extent of the Bishop’s Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap, whilst promoting land at Mill Chase for development, the exclusion of the site from the gap will also maintain the generally open and undeveloped nature of the gap as a whole and avoid coalescence.</p> <p>Respondents highlight that as Policy NE7 relates to settlement pattern it should not be classed as an Natural Environment Policy.</p> <p>A respondent queries the legitimacy of settlement gaps as these are not advocated in NPPF or PPG. Particularly, that the purpose of gaps is to secure settlement separation and identity and not protecting the character and landscape of the area, therefore it appears more land has been</p>		

included within gaps than is necessary, contrary to meeting housing needs and identifying land for development. The point of meeting housing needs is also raised by others who question whether such an approach remains necessary and justified, noting that it provides an additional layer of policy constraint against otherwise potentially sustainable development.

The concept of active travel is raised in some responses and there is a request for the policy to not preclude the creation of high-quality, well-surfaced, appropriately-lit active travel routes across the settlement gaps.

A respondent questions the rationale to carry forward gaps from the adopted local plan, when circumstances have changed in terms of housing need etc.

A respondent states that Policy NE7 lacks the same clear policy framework as adopted Policy CP18 (Joint Core Strategy 2013), Policy NE7 wording only seeks to restrict development which does not undermine the function of the gap and its intended role.

Concern that the proposal for Sir John Moore Barracks which includes the boundary of the settlement gap as currently defined in the adopted local plan. At the same time, it shows land within the gap proposed for housing. On the basis that the land cannot perform both the function of a settlement gap and be allocated for development at the same time. The extent of the gap is to be determined through the master planning process for the site which is considered to be flawed and the gap should be determined first and enforced. This approach is contrary to the approach set out in the PUSH Policy Framework for Gaps referred to in the Topic Paper, July 2024 which is that the designation of gaps is a tool for shaping the pattern of settlements rather than development determining where gaps should be defined.

A number of respondents refer to the Partnership of South Hampshire (PfSH) Policy Framework for Gaps, which refers to '*Gaps are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations.*' The PfSH Framework seeks to avoid a 'proliferation of gaps' in South Hampshire, Policy NE7 promotes 9 gaps in Winchester District which appears to be creating 'a proliferation of gaps' in the south of the District.

With regard to the Welborne Gap some consider this land does not need to be in a settlement gap as it can be maintained undeveloped under two policies: namely Policy SP3 and Policy WK3 as Open Space and fails the criterion included in Policy NE7. An other respondent also refers to this gap and queries both its function and extent and references in the supporting text (para 7.60/7.64) in terms of the PfSH Spatial Position Statement, adoption of the Welborne Plan by Fareham Borough Council and the PfSH Designation for Gaps Guidance 2008, requesting the supporting text needs to be reviewed in the context that only Fareham BC can only plan for land in its area and not the extent of the gap in Winchester. It is incorrect to state that the settlement gap at Wickham and Knowle is designated to service the Welborne Garden Village – which is not the case. A further rep also questions why this gap was not subject of a review in the Settlement Gap Review Report (July 2024), others also take issue with the review as the scope of the purpose and assessment undertaken lacks clarity. Fareham BC support Policy NE7 and the retention of the settlement gaps (viii) Whiteley-Fareham/Fareham Western Wards (the Meon Gap) and (ix) Knowle, Wickham and Welborne.

Some representations refer to settlement gaps being of crucial importance in retaining the integrity of historic villages and should be retained to prevent urban spread and the destruction of the rural character of the land.

This policy should be supported by a map to make clear where these settlement gaps are.

Representation Numbers (Statutory consultees in bold and named)

ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/75/NE7

ANON-AQTS-3B6N-J/8/NE7

ANON-AQTS-3BSY-T/98/NE7

ANON-AQTS-3B44-P - Otterbourne Parish Council/3/NE7

ANON-AQTS-3278-D/5/NE7

ANON-AQTS-32CU-P/6/NE7

ANON-AQTS-3B5A-4/9/NE7

ANON-AQTS-3296-D/1/NE7

ANON-AQTS-32CD-5 - Colden Common Parish Council/52/NE7

ANON-AQTS-3299-G/18/NE7

ANON-AQTS-3BX6-V/6/NE7

ANON-AQTS-32UZ-D/5/NE7

ANON-AQTS-329E-V/6/NE7

ANON-AQTS-32U5-8/8/NE7

ANON-AQTS-32T1-3/2/NE7

ANON-AQTS-32G7-V/17/NE7

ANON-AQTS-32TQ-3/3/NE7

ANON-AQTS-32SB-K - Defence Infrastructure Organisation/10/NE7

ANON-AQTS-3BB1-1/2/NE7

ANON-AQTS-32N7-3 - Twyford Parish Council/4/NE7

BHLF-AQTS-32EE-8/4/NE7

BHLF-AQTS-32EY-V/8/NE7

BHLF-AQTS-32EK-E - Test Valley Borough Council/6/NE7

BHLF-AQTS-3267-B/11/NE7

BHLF-AQTS-3266-A - Fareham Borough Council/8/NE7

BHLF-AQTS-32Y5-C/1/NE7

BHLF-AQTS-32YJ-1/2/NE7

BHLF-AQTS-3288-E/8/NE7

BHLF-AQTS-328Q-7/18/NE7

BHLF-AQTS-3287-D/1/NE7

BHLF-AQTS-328W-D/6/NE7

BHLF-AQTS-3284-A/20/NE7

BHLF-AQTS-328G-W/20/NE7

BHLF-AQTS-328H-X/2/NE7

BHLF-AQTS-32QY-8/13/NE7

ANON-AQTS-32N-2 – Sparsholt Parish Council/1/NE7

Main issues raised in representations received in regulation 19 consultation

- Requests for gaps to be deleted/amended/created to allow for development
- The need to clarify the role and function of settlement gaps in terms of achieving sustainable development and meeting housing needs and unmet needs
- Clarity in terms of the positioning of Policy NE7 in the Natural Environment section of the local plan rather than the Spatial Strategy
- Legitimacy of defining gaps in context of NPPF
- Request for clear maps to define the extent of the gaps
- Specific reference to the Welborne Gap in the context of the adopted Welborne Plan and its function with settlements in Winchester District
- Seeking clarification as to why some gaps were [reviewed](#) and others not.
- Request for policy alternations to include reference to active travel and that such routes would be permissible through a defined gap

Policy/Evidence base document	NE7
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/75/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>1. WCC consider settlement gaps as an important tool in identifying and protecting areas which could potentially be at risk of coalescence and help settlements maintain their separate identities. Development within areas identified as gaps must retain the open and undeveloped nature and ensure that settlements retain their identity. The Policy includes a gap between Winchester and Littleton.</p> <p>2. The policy as drafted does not provide the same clear policy framework as that set out in Policy CP18 of the adopted Joint Core Strategy 2013. Policy NE7 wording only seeks to restrict development which does not undermine the function of the gap and its intended role. Policy CP18 is much clearer on the form of development which would not be acceptable: 'Within these areas only development that does not physically or visually diminish the gap will be allowed.'</p> <p>The supporting text of para 9.43 goes further</p> <ul style="list-style-type: none"> • it would not diminish the physical and/or visual separation of settlements; and • it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. <p>The proposals map for the Sir John Moore Barracks includes the boundary of the settlement gap as currently defined in the adopted local plan. At the same time, it shows land within the gap proposed for housing. Clearly the land cannot perform both the function of a settlement gap and be allocated for development at the same time.</p> <p>3. The Parish Council is concerned that the boundary of the Winchester-Littleton settlement gap is not clearly defined in the Plan. Officers have advised both the Parish Council, and WCC councillors at formal meetings, that the boundary of the gap, as it would apply to the Sir John Moore Barracks would be determined through the masterplan process under Policy W2 after the extent of development had been determined. This is considered to be the wrong approach. The extent of the Winchester-Littleton Gap should have been assessed as part of the review of gaps commissioned by WCC and shown on the proposals map. The delineation of the boundary would then have informed the assessment of the capacity of the site in terms of scale of development. However, it was excluded from the review as the masterplan process would determine the extent of built development within the site which in turn would inform a future review of the gap, ref paragraph 1.8 of the Settlement Gap Review Topic Paper July 2024.</p>

	<p>3. This approach is contrary to the approach set out in the PUSH Policy Framework for Gaps referred to in the Topic Paper, July 2024 which is that the designation of gaps is a tool for shaping the pattern of settlements rather than development determining where gaps should be defined, which is the WCC approach. It is vital that the designation of settlement gaps, given their importance in the overall spatial strategy, should be fully defined in the Plan and shown on the proposals map. It is not a matter to be delegated to a masterplan prepared by the landowner/developer which has no planning status. Support Policy NE7 and the inclusion of a gap between Winchester and Littleton.</p> <p>Object to Policy NE7. The boundary of the Winchester-Littleton settlement gap should be identified on the proposals map of the Plan.</p> <p>Object to Policy NE7. The policy should be re-drafted as follows ‘Development within settlement gaps would only be allowed if it</p> <ul style="list-style-type: none"> • would not diminish the physical and/or visual separation of settlements; and • would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Amend the proposals map to show the extent of the proposed Winchester-Littleton Settlement Gap.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>The policy should be re-drafted as follows ‘Development within settlement gaps would only be allowed if it</p> <ul style="list-style-type: none"> • would not diminish the physical and/or visual separation of settlements; and • would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes Letter (commenting on policies)</p>

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Philip Greenish
Personal reference number	ANON-AQTS-3B6N-J
Full reference number	ANON-AQTS-3B6N-J/8/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The principle of Settlement Gaps, as explained in paragraphs 7.60 to 7.65 and Policy NE7, is strongly supported. In particular, the southern boundary of the Winchester District abuts extensive urban development in the borough of Fareham which could, in time, swamp historic villages close to the boundary. Paragraph 7.64 is noteworthy in drawing Particular attention to the gap between the 6000 dwelling development at Welborne (in the borough of Fareham) and the settlements of Wickham and Knowle. Such gaps are of crucial importance in retaining the integrity of historic villages and should be retained to prevent urban spread and the destruction of the rural character of the land.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	Proposed additional wording in para 7.65 offered IN CAPITALS below: It has been necessary to undertake a careful review of the Settlement Gaps in the Local Plan to ensure the gaps perform the function for which they were intended. An independent review of the Strategic Gaps provides an assessment of the existing Gaps and recommends proposed changes to the boundaries. THESE CHANGES HAVE BEEN INCORPORATED INTO THE PLAN. Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained. THE GAPS AS DEFINED IN THE PLAN MEET THE CONDITIONS OF THE POLICY FRAMEWORK FOR GAPS IN FULL.
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?	No

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/98/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Parish Clerk
Personal reference number	ANON-AQTS-3B44-P - Otterbourne Parish Council
Full reference number	ANON-AQTS-3B44-P - Otterbourne Parish Council/3/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Otterbourne Parish Council supports Policy NE7 item iv. the retention of the Otterbourne-Southdown settlement gap.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Mr Andrew Macleod
Personal reference number	ANON-AQTS-3278-D
Full reference number	ANON-AQTS-3278-D/5/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	As far as I was aware there was a settlement gap agreed a few years back on the land currently occupied by Mayles farm. Extending from Mayles Lane across to Hoads Hill. This was negotiated by Wickham Parish Council & WCC as a measure to separate the Historic village of Wickham from the Welbourne development immediatly south of the village.
What modification(s) are necessary to make the policy legally compliant or sound?	As I am not an expert on these matters I cannot advise of any modification
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Carl Dixon
Personal reference number	ANON-AQTS-32CU-P
Full reference number	ANON-AQTS-32CU-P/6/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	I support the intent of Policy NE7 Settlement Gaps, and consider that the existing draft captures this very well. As a local resident, I am particularly pleased and relieved to see the clear expression of a requirement to preserve a settlement gap between Wickham, Knowle and Welborne. Preservation of the undeveloped nature of this area is particularly important because it is the 'thinnest' band of such landscape which presently separates and defines Wickham and Knowle from neighbouring developments.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Nia Powys
Personal reference number	ANON-AQTS-3B5A-4
Full reference number	ANON-AQTS-3B5A-4/9/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>BSP object to the principle of Policy NE7. The WCC Settlement Gap Review (June 2024) acknowledges that: 'The Government's National Planning Policy Framework (NPPF) does not provide specific policy on the use of settlement gaps in local plans, nor are settlement gaps explicitly defined within NPPF. There is also no reference to gaps within Planning Practice guidance (PPG). In addition, there are no specific requirements within NPPF to identify settlement gaps as part of the plan-making process.'</p> <p>It is noted that the PfSH Spatial Position Statement sets some context for the use of settlement gap policy within the sub-region, but this policy approach was first employed in the Hampshire Structure Plan, many years ago, and is untested in the context of existing and emerging development needs. It is right to consider whether a settlement gap policy remains valid.</p> <p>Further, and in any event, it is notable that the LUC Review takes the approach that 'Any development should not cause harm to the character and landscape of the area.' Clearly, that is not the purpose of settlement gaps, and this statement is at odds with the strategy, which is not to protect valued landscapes or their character, but rather to secure settlement separation and identity. The misconceived approach would, and has, undoubtedly led to the inclusion of more land than within gaps than is necessary, and cannot be allowed to continue if the district is to respond positively to its own needs and unmet needs across the sub-region. The inclusion and/or wording of the policy is particularly important given the position expressed at paragraph 9.17 of the plan, suggesting that the considerable level of unmet need from PfSH (see comments on H1) might be addressed through a Development Plan Document rather than review of the plan, in which case Policy NE7 of the Local Plan would set some unnecessary policy direction and significant 'landscape led' constraints.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Either the policy should be deleted, or it should be clarified.
What is your suggested wording or text for the policy?	Either the policy should be deleted, or it should be clarified as follows: Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten

	the generally open and undeveloped nature of the gap and avoid coalescence, if it is demonstrated that it contributes to the role of the settlement gap.'
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Peter Nicholas Homes
Personal reference number	ANON-AQTS-3296-D
Full reference number	ANON-AQTS-3296-D/1/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent represents Furzeley Golf Course /Denmead Driving Range and Furzehill Farm. The respondent states that both sites fall within the settlement gap between Denmead and Waterlooville identified in the adopted local plan and re-inforced in Policy NE7 of the emerging local plan. The respondent highlights that there are areas in the current settlement gap that do not contribute to openness and its undeveloped character and should not be included in the gap. In this context, it could be said to be not fulfilling the function required of it by Policy NE7. Although it lies entirely within the Denmead/Waterlooville settlement gap it represents a logical southern extension to Denmead and it is considered that development could be brought forward in a landscape led manner that protects the separate identities of Denmead and Waterlooville, enhances the quality and accessibility of the space between the settlements and assists at a strategic level with providing for additional housing. 4.7 Most of the site is included in the SHELAA as DEN 22 and DEN 23. A large part of it is identified as being deliverable/developable. The proposed extensive green infrastructure proposals set out in the Vision Document in Appendix II would help to reinforce and maintain the gap and facilitate improved public access and enjoyment of it.. 4.8 It is submitted that Furzeley Village should come forward as a strategic allocation in the emerging plan in the form of a settlement extension, rather than being left to the much slower, piecemeal and less certain Neighbourhood Planning process. The non inclusion of the site as a strategic allocation in the emerging plan and the reliance on a Neighbourhood Plan process that has been limited in scope to 100 units is considered both a flaw and unjustified. Although it sits in the Denmead/Waterlooville settlement gap it cannot be considered to be contributing to its open and undeveloped nature.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting document 1 (Commenting on policies and policies map) Supporting document 2 (Vision document - Furzeley Village, Denmead)

Policy/Evidence base document	NE7
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/52/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Gleeson Land
Personal reference number	ANON-AQTS-3299-G
Full reference number	ANON-AQTS-3299-G/18/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Notwithstanding the fact that the PfSH 'Policy Framework for Gaps' December 2008 (referenced in the supporting text) has no statutory status and does not form part of the development plan, it states that "In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation." In the context of the gap between Waltham Chase and Swanmore, the gap is substantially excessive. It further states that "the land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence".</p> <p>Firstly, the extent of the gap proposed for protection is so vast it includes significant existing built development along New Road, Forest Road, Brickyard Road and The Lakes. Policy NE7 states that "The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps", but in the case of Waltham Chase and Swanmore this is not true; there is already significant development in this gap.</p> <p>Secondly, the policy goes on to say that "Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence". The extent of the gap is so large, that it would be possible for development on the edge of either settlement to come forward and still maintain a gap such that the settlement did not merge physically or 'threaten' the general open and undeveloped nature of the remaining gap. In other words, it would still be possible in travelling to 'leave' Waltham Chase, perceive oneself to be within an open and undeveloped area between settlements, before 'arriving' at the Swanmore. This would also be true in the other direction.</p> <p>Thirdly, it is possible to develop at the edges of Waltham Chase without eroding the character of the settlement. The policy seeks to retain the separate identity of settlements, development along New Road at SHELAA reference SWA05, could assist with this. The site can deliver a 150 dwellings housing scheme which is entirely designed around the landscape, green and blue infrastructure. There is a natural extent of development denoted in this location by the presence of FZ2/3 which lends itself perfectly to a natural extension to the Swanmore Recreation Ground. This would be a significant benefit as 'The Open Spaces Assessment' in the local plan evidence base identifies shortfalls in sports grounds, play areas and informal green space in Shedfield Parish, and much of the open space in the parish is located to the south and not in</p>

	Waltham Chase. This clearly demonstrates there is clear scope to develop in this gap and not impact on the visual separation of two settlements. This emphasises that the gap as denoted is excessive in size.
What modification(s) are necessary to make the policy legally compliant or sound?	Notwithstanding our earlier points concerning the failure of this local plan to sufficiently plan for the unmet housing needs of the PfSH, the application of such a restrictive policy in a sustainable location for growth around a 'larger' and 'intermediate' rural community is not positively prepared or justified. These locations are exactly where small-scale development should be coming forward to help meet localised housing needs.
What is your suggested wording or text for the policy?	The gap as defined on the policy map should be reduced, the scale is currently excessive.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Mr David Ellrich and The Milligan Trust
Personal reference number	ANON-AQTS-3BX6-V
Full reference number	ANON-AQTS-3BX6-V/6/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Representation on Policy NE7 Settlement Gaps</p> <p>Paragraphs 7.60 to 7.65 set out the background to the policy on Settlement Gaps. Paragraphs 7.60, 7.61 and 7.62 all refer to the Partnership of South Hampshire (PfSH) Policy Framework for Gaps.</p> <p>The PfSH Framework states at paragraph 2.1</p> <p>‘Gaps are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations.’</p> <p>‘...have been used with success in successive strategic plans to influence the settlement pattern of South Hampshire.’</p> <p>It is evident from these quotes that the Policy Framework on Gaps intends that gaps relate to settlement patterns and not to matters of nature conservation.</p> <p>This policy should not be classed as ‘NE’ in Biodiversity and the Natural Environment. The policy relates to the settlement pattern, and this should be made evident in the Plan.</p> <p>Policy NE 7 Settlement Gaps lists 9 different gaps. It is noted that the PfSH Framework states at paragraph 3.1:</p> <p>To ensure consistency across South Hampshire and to avoid any proliferation of gaps which could preclude sufficient land being made available for employment and housing development, the following criteria should be used by local planning authorities to select locations for the designation of gaps in South Hampshire:-</p> <ol style="list-style-type: none"> a) The open nature/sense of separation between settlements cannot be retained by other policy designations; b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence. c) In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation. <p>The PfSH Framework was seeking to avoid a ‘proliferation of gaps’ in South Hampshire. The contribution of Policy NE7 promoting 9 gaps in Winchester District appears to be creating just that ‘a proliferation of gaps.’</p> <p>In respect of the gap at Knowle, Wickham and Welborne the Gap fails the above criteria.</p> <p>The Welborne Gap is shown on page 459 as Open Space (Policy WK3) and Settlement Gap (Policy NE7).</p> <p>This land does not need to be in a settlement gap as it can be maintained undeveloped under two policies:</p>

	<p>namely Policy SP3 Development in the Countryside and Policy WK3 as Open Space. It does not need to be a designated gap, and it fails the criterion:</p> <p>a) The open nature/sense of separation between settlements cannot be retained by other policy designations Turning to the second of the criteria regarding ‘separating settlements at risk of coalescence’ the land is not at risk of coalescence with either Welborne or Wickham. The northward extension of Welborne is limited by the boundary between Fareham Borough and Winchester District. The next nearest settlement is Wickham which is some 1.2km away from the administrative boundary between Fareham Borough and Winchester District. The expansion of the development at Knowle by the allocation of 200 houses at Ravenswood is a decision of Winchester City Council. It is nonsense to require a settlement gap to stop the Council from expanding the settlement under its control still further.</p> <p>Finally in respect of criterion c) the inclusion of a swathe of land 1.2km in length ‘is more than is necessary to prevent coalescence’.</p> <p>In reviewing this settlement gap regard has been taken of the Settlement Gap Review July 2024. It is noted that the Review omits to assess The Welborne Wickham gap. The review refers to: The land between Welborne and the existing settlements of Fareham, Funtley, Knowle and Wickham is designated as settlement buffers to be used as open green infrastructure, in accordance with Policies WEL5 and WEL29 (Fareham Local Plan Part 3: The Welborne Plan).</p> <p>It is not evident why the above explanation justifies no assessment of the proposed gap as the gap is in Winchester District not Fareham Borough. This seems to underline that fact that this gap is unnecessary. In conclusion to make this Plan sound Policy NE7 should not be defined as a policy under the Natural Environment. It is a settlement policy and always has been. In the Local Plan Part 1, adopted in 2013 the policy was under the heading ‘High Quality Environment’. It should be removed from the Natural Environment section of the Plan.</p> <p>The application of this policy to the Open Space allocation at Welborne does not meet with the guidelines of the Partnership for South Hampshire Framework for Gaps. The gap status should be removed from this land.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Representation on Policy NE7 Settlement Gaps</p> <p>Paragraphs 7.60 to 7.65 set out the background to the policy on Settlement Gaps. Paragraphs 7.60, 7.61 and 7.62 all refer to the Partnership of South Hampshire (PfSH) Policy Framework for Gaps.</p> <p>The PfSH Framework states at paragraph 2.1 ‘Gaps are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations.’ ‘...have been used with success in successive strategic plans to influence the settlement pattern of South Hampshire.’</p> <p>It is evident from these quotes that the Policy Framework on Gaps intends that gaps relate to settlement patterns and not to matters of nature conservation.</p> <p>This policy should not be classed as ‘NE’ in Biodiversity and the Natural Environment. The policy relates to the settlement pattern, and this should be made evident in the Plan.</p>

Policy NE 7 Settlement Gaps lists 9 different gaps. It is noted that the PfSH Framework states at paragraph 3.1:

To ensure consistency across South Hampshire and to avoid any proliferation of gaps which could preclude sufficient land being made available for employment and housing development, the following criteria should be used by local planning authorities to select locations for the designation of gaps in South Hampshire:-

- a) The open nature/sense of separation between settlements cannot be retained by other policy designations;
- b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence.
- c) In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.

The PfSH Framework was seeking to avoid a 'proliferation of gaps' in South Hampshire. The contribution of Policy NE7 promoting 9 gaps in Winchester District appears to be creating just that 'a proliferation of gaps.' In respect of the gap at Knowle, Wickham and Welborne the Gap fails the above criteria.

The Welborne Gap is shown on page 459 as Open Space (Policy WK3) and Settlement Gap (Policy NE7). This land does not need to be in a settlement gap as it can be maintained undeveloped under two policies: namely Policy SP3 Development in the Countryside and Policy WK3 as Open Space. It does not need to be a designated gap, and it fails the criterion:

- a) The open nature/sense of separation between settlements cannot be retained by other policy designations
- Turning to the second of the criteria regarding 'separating settlements at risk of coalescence' the land is not at risk of coalescence with either Welborne or Wickham. The northward extension of Welborne is limited by the boundary between Fareham Borough and Winchester District. The next nearest settlement is Wickham which is some 1.2km away from the administrative boundary between Fareham Borough and Winchester District. The expansion of the development at Knowle by the allocation of 200 houses at Ravenswood is a decision of Winchester City Council. It is nonsense to require a settlement gap to stop the Council from expanding the settlement under its control still further.

Finally in respect of criterion c) the inclusion of a swathe of land 1.2km in length 'is more than is necessary to prevent coalescence'.

In reviewing this settlement gap regard has been taken of the Settlement Gap Review July 2024. It is noted that the Review omits to assess The Welborne Wickham gap. The review refers to:

The land between Welborne and the existing settlements of Fareham, Funtley, Knowle and Wickham is designated as settlement buffers to be used as open green infrastructure, in accordance with Policies WEL5 and WEL29 (Fareham Local Plan Part 3: The Welborne Plan).

It is not evident why the above explanation justifies no assessment of the proposed gap as the gap is in Winchester District not Fareham Borough. This seems to underline that fact that this gap is unnecessary.

In conclusion to make this Plan sound Policy NE7 should not be defined as a policy under the Natural Environment. It is a settlement policy and always has been. In the Local Plan Part 1, adopted in 2013 the

	<p>policy was under the heading 'High Quality Environment'. It should be removed from the Natural Environment section of the Plan.</p> <p>The application of this policy to the Open Space allocation at Welborne does not meet with the guidelines of the Partnership for South Hampshire Framework for Gaps. The gap status should be removed from this land.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>Representation on Policy NE7 Settlement Gaps</p> <p>Paragraphs 7.60 to 7.65 set out the background to the policy on Settlement Gaps. Paragraphs 7.60, 7.61 and 7.62 all refer to the Partnership of South Hampshire (PfSH) Policy Framework for Gaps.</p> <p>The PfSH Framework states at paragraph 2.1</p> <p>'Gaps are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations.'</p> <p>'...have been used with success in successive strategic plans to influence the settlement pattern of South Hampshire.'</p> <p>It is evident from these quotes that the Policy Framework on Gaps intends that gaps relate to settlement patterns and not to matters of nature conservation.</p> <p>This policy should not be classed as 'NE' in Biodiversity and the Natural Environment. The policy relates to the settlement pattern, and this should be made evident in the Plan.</p> <p>Policy NE 7 Settlement Gaps lists 9 different gaps. It is noted that the PfSH Framework states at paragraph 3.1:</p> <p>To ensure consistency across South Hampshire and to avoid any proliferation of gaps which could preclude sufficient land being made available for employment and housing development, the following criteria should be used by local planning authorities to select locations for the designation of gaps in South Hampshire:-</p> <ul style="list-style-type: none"> a) The open nature/sense of separation between settlements cannot be retained by other policy designations; b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence. c) In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation. <p>The PfSH Framework was seeking to avoid a 'proliferation of gaps' in South Hampshire. The contribution of Policy NE7 promoting 9 gaps in Winchester District appears to be creating just that 'a proliferation of gaps.'</p> <p>In respect of the gap at Knowle, Wickham and Welborne the Gap fails the above criteria.</p> <p>The Welborne Gap is shown on page 459 as Open Space (Policy WK3) and Settlement Gap (Policy NE7).</p> <p>This land does not need to be in a settlement gap as it can be maintained undeveloped under two policies: namely Policy SP3 Development in the Countryside and Policy WK3 as Open Space. It does not need to be a designated gap, and it fails the criterion:</p> <ul style="list-style-type: none"> a) The open nature/sense of separation between settlements cannot be retained by other policy designations <p>Turning to the second of the criteria regarding 'separating settlements at risk of coalescence' the land is not at risk of coalescence with either Welborne or Wickham. The northward extension of Welborne is limited by the boundary between Fareham Borough and Winchester District. The next nearest settlement is Wickham</p>

	<p>which is some 1.2km away from the administrative boundary between Fareham Borough and Winchester District. The expansion of the development at Knowle by the allocation of 200 houses at Ravenswood is a decision of Winchester City Council. It is nonsense to require a settlement gap to stop the Council from expanding the settlement under its control still further.</p> <p>Finally in respect of criterion c) the inclusion of a swathe of land 1.2km in length 'is more than is necessary to prevent coalescence'.</p> <p>In reviewing this settlement gap regard has been taken of the Settlement Gap Review July 2024. It is noted that the Review omits to assess The Welborne Wickham gap. The review refers to: The land between Welborne and the existing settlements of Fareham, Funtley, Knowle and Wickham is designated as settlement buffers to be used as open green infrastructure, in accordance with Policies WEL5 and WEL29 (Fareham Local Plan Part 3: The Welborne Plan).</p> <p>It is not evident why the above explanation justifies no assessment of the proposed gap as the gap is in Winchester District not Fareham Borough. This seems to underline that fact that this gap is unnecessary.</p> <p>In conclusion to make this Plan sound Policy NE7 should not be defined as a policy under the Natural Environment. It is a settlement policy and always has been. In the Local Plan Part 1, adopted in 2013 the policy was under the heading 'High Quality Environment'. It should be removed from the Natural Environment section of the Plan.</p> <p>The application of this policy to the Open Space allocation at Welborne does not meet with the guidelines of the Partnership for South Hampshire Framework for Gaps. The gap status should be removed from this land.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>No, I don't want to take part in a hearing session</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE7
Name of respondent (or client)	Sandra McLaren
Personal reference number	ANON-AQTS-32UZ-D
Full reference number	ANON-AQTS-32UZ-D/5/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	I absolutely agree that the local planning authority should retain the generally open and undeveloped nature of the defined Settlement Gap between Winchester and Littleton.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Thomas Hutchinson
Personal reference number	ANON-AQTS-329E-V
Full reference number	ANON-AQTS-329E-V/6/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Settlement Gap between Denmead and Waterloooville is supported. Any major development here would erode the identify of these separate communities.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Church Commissioners for England
Personal reference number	ANON-AQTS-32U5-8
Full reference number	ANON-AQTS-32U5-8/8/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	This policy should be supported by a map to make clear where these settlement gaps are. Clarification should be included that development proposed on site allocations have been accepted in principle as not undermining the function of the settlement gap.
What modification(s) are necessary to make the policy legally compliant or sound?	Clarification should be included that development proposed on site allocations have been accepted in principle as not undermining the function of the settlement gap.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Buckland Development Ltd
Personal reference number	ANON-AQTS-32T1-3
Full reference number	ANON-AQTS-32T1-3/2/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Buckland consider Policy NE7: Settlement Gaps to comply with the Duty to Cooperate, be legally complaint, and to be sound. However, we do have some observations surrounding the supporting text of the policy, which would merit adjustment for clarificatory purposes.</p> <p>The supporting text of Policy NE7: Settlement Gaps at 7.60 refers to the Partnership for South Hampshire (PfSH) guidance for designation of gaps (Policy Framework for Gaps, PUSH), which was published in December 2008. PfSH has subsequently published several documents which supersede the details provided in the Policy Framework for Gaps, the most recent of which is the Spatial Position Statement 2023, which did not use the 2008 report as part of its evidence base. Buckland acknowledges that the position statement is not an upper tier plan with which future local plans needs to conform, however, it is considered that the most up-to-date evidence should be used to support the plan.</p> <p>The supporting text further states at 7.64 that ‘following adoption of the Welborne Plan by Fareham Borough Council in 2015 the boundaries of the gap within Winchester are confirmed’. It is our view that this wording is unclear. Whilst the Welborne Plan confirmed the boundaries of Welborne, it did not confirm the ‘boundaries of the gap within Winchester’ as this text suggests, as FBC could only plan for areas within its own jurisdiction. As such, it is Policy NE7 (and policy map) which confirms the boundary of this Gap, not the Welborne Plan. This wording should be reviewed in this context.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	NE7
Name of respondent (or client)	Bargate Homes
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/17/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Bargate Homes acknowledge that strategic and local gap designations have been used across Hampshire as a tool that to assist in minimising the potential for coalescence between built-up areas. However, given the scale of growth required and national planning policy guidance it is now questionable whether such an approach remains necessary and justified, noting that it provides an additional layer of policy constraint against otherwise potentially sustainable development.</p> <p>Although it is noted by draft policy NE7, that some development can still take place within gaps without undermining their overall function, the starting point for any new gap policy should be a thorough review of the existing gap, to identify whether the land originally designated for this purpose continues to fulfil this function, or whether parts of the gap are no longer required, to ensure that any remaining gap includes no more land than is strictly necessary. Furthermore, as outlined further in the accompanying response to the Settlement Gap Topic Paper which forms part of the Regulation 19 evidence base, there are concerns regarding the proposed approach and methodology, which undermines the basis for Policy NE7 as currently drafted.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The policy should ensure that application of settlement gaps are assessed in a flexible manner, and on a case-by-case basis, to ensure it is soundly based.
What is your suggested wording or text for the policy?	<p>The policy wording “The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps” should be amended to:</p> <p>“The local planning authority will review planning applications on a case-by-case basis, with consideration of the following defined settlement gaps.”</p> <p>The policy wording “within these areas only development that does not undermine the function of the gap and its intended role” should be amended to:</p> <p>“Within these areas, applications should be assessed on a case-by-case basis to understand how it relates the function of the gap and its intended role.”</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE7
Name of respondent (or client)	Laura Cornborough
Personal reference number	ANON-AQTS-32TQ-3
Full reference number	ANON-AQTS-32TQ-3/3/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	4Whilst Foreman Homes recognise the importance of Settlement Gaps in order to define and retain the separate identity of settlements, the Otterbourne-Southdown Gap should be removed, or simply narrowed to only include the woodland east of Otterbourne Road. WCC's Settlement Gap Review recognises that in terms of the Otterbourne – Southdown Gap, “development in the field and nursery forming the western part of the defined gap would narrow an already fragile gap, but merger of Otterbourne and Southdown would not significantly change the semi-rural character or setting of either.”
What modification(s) are necessary to make the policy legally compliant or sound?	Remove or reduce the Settlement Gap between Otterbourne and South Down.
What is your suggested wording or text for the policy?	Remove Criterion (iv).
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	Yes Supporting information (comments on policies)

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Defence Infrastructure Organisation
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/10/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We support the approach within Policy NE7 to retain the open and undeveloped nature of defined settlement gaps but note that this policy establishes a policy presumption against large scale development within them. The “Littleton Gap” includes around a third of the SJMB site (to the south of the SJMB site) which already contains numerous substantial buildings on it with the extent of the gap seemingly being based on an arbitrary boundary which cuts across part of the SJMB built up area without regard to any logical topographical or infrastructure (such as roads) features to define the edge of the ‘gap’ there. We request that a new Settlement Gap is drawn and DIO would be pleased to discuss and agree an amendment to the gap with officers from WCC in due course. The existing green infrastructure to the western SJMB boundary with Littleton, and to the southern SJMB boundary (including an existing SINC) with Harestock could be retained to continue to perform a buffer function to these adjoining settlements. Our proposal is illustrated on the attached plan. The proposed revisions would correctly align the policy framework to the allocation site, and provide appropriate policy function to maintain an appropriate settlement gap with Littleton drawn to appropriate features and characteristics of the site.</p> <p>As a minimum, the settlement gap should be amended to remove the part of the site that already has numerous large substantial buildings on it.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>We support the approach within Policy NE7 to retain the open and undeveloped nature of defined settlement gaps but note that this policy establishes a policy presumption against large scale development within them. The “Littleton Gap” includes around a third of the SJMB site (to the south of the SJMB site) which already contains numerous substantial buildings on it with the extent of the gap seemingly being based on an arbitrary boundary which cuts across part of the SJMB built up area without regard to any logical topographical or infrastructure (such as roads) features to define the edge of the ‘gap’ there. We request that a new Settlement Gap is drawn and DIO would be pleased to discuss and agree an amendment to the gap with officers from WCC in due course. The existing green infrastructure to the western SJMB boundary with Littleton, and to the southern SJMB boundary (including an existing SINC) with Harestock could be retained to continue to perform a buffer function to these adjoining settlements. Our proposal is illustrated on the attached plan. The proposed revisions would correctly align the policy framework</p>

	<p>to the allocation site, and provide appropriate policy function to maintain an appropriate settlement gap with Littleton drawn to appropriate features and characteristics of the site.</p> <p>As a minimum, the settlement gap should be amended to remove the part of the site that already has numerous large substantial buildings on it.</p>
What is your suggested wording or text for the policy?	See modification response and additional supporting information and emailed response which includes a map showing the suggested changes to the extent of the Littleton 'Gap'.
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
<p>Have you submitted supporting information?</p> <p><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p>Letter (commenting on policies)</p>

Policy/Evidence base document	NE7
Name of respondent (or client)	Charles William Bone
Personal reference number	ANON-AQTS-3BB1-1
Full reference number	ANON-AQTS-3BB1-1/2/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	I cannot comment on the legality of the policy. It is important to protect the area to the south of Olivers Battery. An application to build houses on South Winchester Golf Course, when it was in the construction phase, was turned down by the then Secretary of State in 1989. (Departments of the Environment and Transport letter APP/L1765/A/88/105300 dated 1st Jun 1989, signed by Miss J R Pool for Secretary of State) This was in respect of the Appeal by Leading Leisure PLC in respect of Planning Application No W/3548/11. It was noted in this letter that the siting of 30 houses would be contrary to the relevant Structure Plan and Winchester Area Local Plan, which I believe included a Settlement Gap between Olivers Battery and Hursley/Compton.
What modification(s) are necessary to make the policy legally compliant or sound?	A Settlement Gap Olivers Battery/ Badger Farm Road to Compton/Hursley needs to be introduced. This would prevent the Coalescence of Settlements.
What is your suggested wording or text for the policy?	A Gap should be added to Policy NE 7 and Para7.63: Olivers Battery, Badger Farm Road to Hursley and Compton.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

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



Policy/Evidence base document	NE7
Name of respondent (or client)	Jamie Matthews .. Clerk
Personal reference number	ANON-AQTS-32N7-3 - Twyford Parish Council
Full reference number	ANON-AQTS-32N7-3 - Twyford Parish Council/4/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>The WDLP does not identify firstly the undeveloped land north of Colden Common on both sides of the B3335 as far as the boundary of the South Downs national park and secondly the land between as a settlement gaps in accordance with policy NE7.</p> <p>1. Land in North of Colden Common: This land should be included</p> <p>a. it complements Twyford neighbourhood Plan Policy LHE1.</p> <p>b. it qualifies under the criteria listed in NE7 para 7.61 as set out below .</p> <p>c. it is identified as part of a gap between the two settlements in WDLP 14.67: "The site is prominent in the landscape, providing a visual break to the nearby village of Twyford and marks the entrance to the village." and in the allocation policy itself ie. CC3: "vi. Provide landscaping to create a new settlement edge to the north of the site which retains a gap to Twyford village. "</p> <p>d. It is a necessary part of the gap identified by South Downs National Park Authority (with Twyford Parish Council) in the Twyford Neighbourhood plan(TNP) under Policy LHE 1. The built parts of Twyford and Colden Common are close together. The National Park/WCC boundary gives a small amount of undeveloped land between the two . This is under threat from development southwards from Twyford (multiple current applications) and northwards from Colden Common , as evidenced for instance by CC3. In TNP, the defined Settlement gap extends close to the boundary of the Parish which is also the National Park Boundary.</p> <p>e. The development of CC3 will change the perception of the northern part of Colden Common from one of long established ribbon development, to one of estate development in depth makes further development pressure much more likely. The Settlement gap policy for the remaining undeveloped land is the appropriate policy for control in the interests both of Colden Common.</p> <p>2.Shawford: Land to west of Itchen Navigation The TNP identifies a settlement gap between Shawford and Twyford. While most of the land needed for this gap is in Twyford parish, land to the west of the Itchen navigation and within the WDLP has the potential to affect the integrity of the gap and erode its character and effect. Some of this land is sloping and overlooks</p>

	<p>the flat valley land; a small amount is within the SDNP. All the land bordering the TNP gap needs to be considered in detail for inclusion.</p> <p>The absence of these two settlement gaps from NE7 appears to indicate a failure to cooperate in a proactive way between SDNPA and WCC and a failure to recognizing the initiative of the TNP in providing more detailed policies for this sensitive part of WCC adjacent to the National Park.</p> <p>The wording of the TNP policy LHE1 was modelled on the long established gap policies of WCC and of other District in South Hampshire. It is entirely consistent with the NE7.</p> <p>-----</p> <p>Plan of Colden Common/ Twyford Gap Plan of Shawford /Twyford Gap APPENDIX: 7.61</p> <p>In summary, the PfSH Framework advocates the following criteria for use by local planning authorities to select locations for the designation of gaps:-</p> <ul style="list-style-type: none"> • The open nature/sense of separation between settlements cannot be retained by other policy designations; • The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence; • In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>add to NE7</p> <ul style="list-style-type: none"> x. Colden Common and Twyford xi. Shawford and Twyford <p>see plans</p>
<p>What is your suggested wording or text for the policy?</p>	<ul style="list-style-type: none"> x. Colden Common and Twyford xi. Shawford and Twyford <p>see plans</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i></p>	<p>No</p>

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



Policy/Evidence base document	NE7
Name of respondent (or client)	Footstep Active Living Ltd
Personal reference number	BHLF-AQTS-32EE-8
Full reference number	BHLF-AQTS-32EE-8/4/NE7
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>We object to the extent of the settlement gap between Otterbourne and Southdown. Whilst the purpose of seeking to avoid coalescence of urban areas is acknowledged, it is considered that the land at George Beckett Nursery which fronts onto the Otterbourne Road already forms part of the urban fabric of the settlement by virtue of being located between existing built form, and its character reflecting an urban setting – buildings, hardstanding, boundary treatments, and retail/human activity. The site also represents previously developed land (PDL).</p> <p>It therefore contributes nothing to the role and function of the gap.</p> <p>The Settlement Gap Review (2024) – which is a light-touch desk-based assessment – has not specified any amendments to the Otterbourne/Southdown gap, but the strategy of the draft Local Plan is to restrict growth around these settlements, despite them being in a sustainable location.</p> <p>The 2024 Review seemingly refers to the open field and the nursery as a single entity. They are not. The field is separate to the nursery and could continue to fulfil the function of the gap in isolation.</p> <p>It is perfectly legitimate therefore for the Local Plan process to consider adjustments to the gap, subject to consideration of the impact of any changes on the function of the gap. Paragraph A.87 of the Settlement Gap Review (2024) acknowledges that “there is little sense of distinction between this area and the defined settlement edge”. Therefore, given the negligible contribution the Nursery frontage makes to the gap, it is considered that the function of the gap would be preserved if the site was removed from the gap.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Amend the extent of the Otterbourne/Southdown settlement gap to remove the Nursery frontage.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting document 1 (Location Plan) Supporting document 2 (form commenting on H3) Supporting document 3 (Form commenting on D6) Supporting document 4 (Form commenting on H4) Supporting document 5 (Form commenting on NE7)

Policy/Evidence base document	NE7
Name of respondent (or client)	George Whalley
Personal reference number	BHLF-AQTS-32EY-V
Full reference number	BHLF-AQTS-32EY-V/8/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Policy NE7 Settlement Gaps</p> <p>2.76 Through the preparation of the Local Plan, a review has been undertaken of the District settlement gaps as set out in the Settlement Gap Review 8. We object to the extent of the Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap as defined by Policy NE7.</p> <p>2.77 The proposed gap is not justified or consistent with national policy and should exclude Land at Mill Chase (SHELAA, BW11). Our response to Policy H3 sets out the justification for the allocation of the site and exclusion from the settlement gap.</p> <p>Appendix 2 of these representations also demonstrates that allocation of the site will not affect the integrity of the local gap and complies with the NPPF and Policy NE7.</p> <p>2.78 Policy NE7 defines a number of local gaps in the district which comprise generally undeveloped and open land which help to define and retain the separate identify of settlements. Settlement gaps have been established within the district in accordance with the Partnership for South Hampshire (PfSH) criteria for designation 'Policy Framework for Gaps' (December 2008).</p> <p>2.79 The NPPF states that local plans will identify the location of gaps and include policies to set out the types of development which will be permitted, based on the following principles:</p> <ul style="list-style-type: none"> • It would not diminish the physical and/or visual separation of settlements; and • It would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. <p>2.80 The Local Plan and Policy NE7 defines a number of settlement gaps which includes the Bishop's Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap.</p> <p>2.81 The exclusion of Land at Mill Chase from the local gap is consistent with the NPPF and Policy NE7 in not undermining the function of the gap and its intended role and retaining the separate identify of Bishops Waltham and Waltham Chase. The exclusion of the site from the gap will also maintain the generally open and undeveloped nature of the gap as a whole and avoid coalescence.</p>
What modification(s) are necessary to make the	

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Mary Goodwin
Personal reference number	BHLF-AQTS-32EK-E - Test Valley Borough Council
Full reference number	BHLF-AQTS-32EK-E - Test Valley Borough Council/6/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Plan includes strategic provision for local gaps (Policy NE7), in line with 2008 PfSH guidance, to help maintain the integrity, open and visual character of physical gaps between settlements. This is consistent with our own adopted plan and our emerging local plan policies for local gaps.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (copy of form - refers to letter) Letter (Commenting on policies)

Policy/Evidence base document	NE7
Name of respondent (or client)	Blenheim Strategic Partners LLP
Personal reference number	BHLF-AQTS-3267-B
Full reference number	BHLF-AQTS-3267-B/11/NE7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE7 Settlement gaps</p> <p>5.5 This policy is considered to be:</p> <ul style="list-style-type: none"> • Legally compliant • Sound • In compliance with the duty to co-operate <p>5.6 BSP fully endorse the protection of character and identity. Gaps between settlements can sometimes be extensive, emphasised by topography, natural features, or agricultural field patterns, whereas some gaps are limited to no more than the width of a small paddock or field.</p> <p>5.7 However small these gaps, settlements refuse coalescence by maintaining greenery between them, such as woodland. Once such gap exists between Kings Worthy, Headbourne Worthy and Abbots Worthy. This gap performs a critical role in aiding the retention of local distinctiveness of each village and must not be eroded by development. Any development proposals within Kings Worthy should seek to enhance the level of protection this gap affords and the development opportunity east of Lovedon Lane does this by proposing an extension to the settlement gap, reinforcing its importance. The settlement gap has been considered historically by inspectors examining the adopted Local Plan and it was concluded that the gap between Kings Worthy and Abbots Worthy was important. Within the inspectors report into the examination of the Local Plan the report stated that... 'the gap creates the separation required to maintain the distinction. The separation creating a definitive sense of leaving one settlement and having to cross the A33 and a swath of countryside before arrival at the other'. It is essential that there is not breach or infill within this gap, and equally, this gap should not be amended.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (referring to letter) Letter (commenting on policies)

Policy/Evidence base document	NE7
Name of respondent (or client)	Fareham Borough Council
Personal reference number	BHLF-AQTS-3266-A - Fareham Borough Council
Full reference number	BHLF-AQTS-3266-A - Fareham Borough Council/8/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Full response on website Policy NE7 – Settlement Gap Fareham Borough Council welcome the retention of the settlement gaps (viii) Whiteley-Fareham/Fareham Western Wards (the Meon Gap) and (ix) Knowle, Wickham and Welborne and consider the policy approach taken as set out in Policy NE7 is sound.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes Letter (commenting on policies)</p>

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Hampshire Chamber of Commerce
Personal reference number	BHLF-AQTS-32Y5-C
Full reference number	BHLF-AQTS-32Y5-C/1/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>On behalf of Hampshire Chamber of Commerce including its Planning & Transport Business Strategy Group, and Winchester & District Business Strategy Group at Hampshire Chamber of Commerce we would like to provide the following comments in regards to the Winchester Proposed Submission Local Plan (Regulation 19).</p> <p>The comments have been agreed by Ross McNally in his capacity as Chief Executive/Executive Chair at Hampshire Chamber of Commerce. We believe that NE.7 Gap Policy should be deleted. The Chamber objected to Policy NE7 at the previous stage of the Local Plan (Reg. 18).</p> <p>The deletion has become much more significant given the new government's stated objective of substantially increasing the provision of housing. The new figure for Winchester is an increase of 62% from 432 dwellings per annum to 676 dwellings per annum.</p> <p>The government has provided a provisional arrangement to proceed with previous housing figures if the Local Plan has reached the Regulation19 stage. The City Council has decided to take advantage of this concession, but it is essentially an interim position. Once the Local Plan Reg. 19 has been examined by an Inspector and approved the Council must commence a new Local Plan and the new housing and other government requirements must be addressed.</p> <p>Proposed Reforms of the National Planning Policy Framework and Other Changes to the Planning System 2</p> <p>The new government published a draft version of the NPPF seeking views on its content. It also published Consultation document that discussed the Proposed Reforms, and it sought responses to a wide range of issues.</p> <p>The Chamber has identified a number of the Reforms which, in its opinion, justified the deletion of the Gap Policy NE7 now. These extracts are quoted below:- The new Government campaigned on a mandate of reforming the planning system to enable the building of 1.5M new homes, to deliver the affordable homes we need, and to provide the employment space and infrastructure which is essential to boost our economy. To achieve this the new government has made this mandatory. Its states:- a. make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all</p>

other options; The new targets will mean councils must boost housebuilding in areas most in need, helping more people buy their own homes, removing the largest barriers to economic growth, and getting Britain building again. The government has advised that local authorities must plan for the higher figure. The government is reinforcing the “presumption” in favour of sustainable development. The Chamber supports this presumption, but it regards the “failsafe” as particularly important. f. improve the operation of ‘the presumption’ in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies; and, introducing new safeguards, to make clear that its application cannot justify poor quality development;

The Chamber recognises that there is a shortage of affordable homes. h. make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need on all housing development and that the planning system supports a more diverse housebuilding sector; The Chamber believes that communities must be involved in shaping development, but it doesn’t believe that this is compatible with the use of ‘intervention powers’ to achieve it. This will create strife. f. ensure communities continue to shape housebuilding in their areas, demanding universal local plan coverage from all local planning authorities, while making full use of intervention powers to build the houses we need if this is not achieved; The Chamber is especially supportive of the objective to increase the use of brownfield land to achieve all forms of development. This accords with the government objective below:- 5. We have been clear that brownfield land must be the first port of call. We want to make clear that the principle of development should not be in question on brownfield land, and so we are consulting on an amendment to paragraph 124c out of the current NPPF, reinforcing the expectation that development proposals on previously developed 3

land are viewed positively. This makes clear that the default answer to brownfield development should be yes. The Chamber supports the government’s objective of increasing the provision of small sites. It is considered that the criteria should be modified, and, in addition, the Council should make specific allocations for small sites based upon the modified criteria.

Making the small site allocation mandatory 15. Small and medium sized builders are essential to meeting our housing expectations and supporting local economies. They also build out the majority of small sites. Their business models often rely on identifying and securing small sites and building them out quickly. The Government is concerned that SME housebuilders are not able to access the small sites that they need, and that local planning authorities are not bringing forward small sites in their plans to the level set out in the NPPF. The Chamber has set out its support for the development of small sites in a separate comment to the Local Plan.

GAP Policy CP18 now NE7 in the emerging Local Plan

Hampshire Chamber of Commerce objected to Policy NE7 at the previous stage of the Local Plan. There have been some significant developments recently and the Council agreed that a site in Whiteley Lane, Whiteley for two dwellings did not affect the function of the Gap (24/01343/OUT).

	<p>An Inspector's Decision with regards to a site in School Lane, Kingsworthy for one dwelling also did not affect the function of the Gap (APP/L1765/W/22/3310078). The same reasoning should have applied to a site in Lower Chase Road, Swanmore ((APP/L1765/W/17/3174240). This appeal was dismissed on grounds of conflict with the infilling criteria (6 dwellings) and conflict with the Swanmore to Bishops Waltham Gap. Can you clarify why Gaps are retained in these situations, and what is the meaning of not affecting the function of the Gap? And what then is the purpose of the Gap?</p> <p>The principal objective of the Gap Policies is to prevent development, but it applies to settlements that are the most sustainable and it mainly affects small sites, the large sites are often supported to meet the housing requirement.</p> <p>It is concluded that Gap Policy NE7 is an unjustified extra hurdle for the development of small sites and the Policy should be deleted.</p> <p>For these reasons, the Local Plan is regarded as "unsound".</p> <p>see additional info PDF</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (refers to letter) Letter (commenting on NE7) Letter (commenting on small sites policy)</p>

Policy/Evidence base document	NE7
Name of respondent (or client)	Graham Moyse
Personal reference number	BHLF-AQTS-32YJ-1
Full reference number	BHLF-AQTS-32YJ-1/2/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Policy NE7 aims to preserve the generally open and undeveloped nature of identified settlement gaps. It lists nine gaps, carried forward from the current Local Plan. The Regulation 19 consultation is supported by a Settlement Gap Review (July 2024), conducted by LUC. Regarding the Knowle- Wickham- Welborne Gap, the review states:</p> <p>“The remaining two settlement gaps – between Knowle, Wickham and Welborne, and between Winchester and Littleton – have not been assessed. The Welborne settlement gap has not been included in the Settlement Gap Review because planning permission has already been granted for the Welborne development at Fareham. The land between Welborne and the existing settlements of Fareham, Funtley, Knowle, and Wickham is designated as settlement buffers for open green infrastructure, in accordance with Policies WEL5 and WEL29 (Fareham Local Plan Part 3: The Welborne Plan). This existing designation and planning framework ensure that the separation and integrity of these settlements are maintained, making further study of this settlement gap unnecessary at this moment in time.”</p> <p>Our client has significant concerns that the decision to exclude the Knowle-Wickham-Welborne settlement gap from the Settlement Gap Review lacks clear justification and accordingly the gap as drawn cannot be said to be justified and effective. We would therefore urge the Council to expand the review to include the Knowle, Wickham and Welborne gap, and the Winchester and Littleton gap for the same reason.</p> <p>The justification given for excluding the Knowle, Wickham and Welborne gap from the review are policies contained with the Fareham Local Plan. These are:</p> <p>Policy WEL5 – Maintaining Settlement Separation – specifically applies to the Welborne allocation. It requires development proposals to respect and maintain the physical and visual separation of Welborne from adjoining settlements (Fareham, Funtley, Knowle, and Wickham), protecting the individual character and identity of each settlement. For settlements in Winchester District, Policy WEL5 of the Fareham Local Plan includes the following provisions:</p> <p>Knowle: Land within the Welborne Plan boundary, adjacent to Knowle and Ravenswood House Hospital, with a minimum width of 50 metres, is allocated as a settlement buffer. Development adjacent to this buffer will only be permitted if it maintains the integrity of the buffer and protects the ancient woodland remnants at the boundary of Knowle Triangle. Fareham Borough Council and Winchester City Council will collaborate to</p>

ensure that the Knowle Triangle serves as both green infrastructure and a settlement buffer in a way consistent with the Winchester Local Plan.

Wickham: Land within the Welborne Plan boundary, comprising Blakes Copse, the rear of properties on Hoads Hill, and the northernmost edge of the Welborne site (50 metres in width), is allocated as a settlement buffer.

Policy WEL29 relates to on-site green infrastructure and does not impact settlement gaps within Winchester District.

Neither policy in the adopted Fareham Local Plan has any relevance to the extent of a settlement gap within Winchester District. Therefore, the justification provided is totally insufficient.

Considering the importance of undertaking a full and comprehensive review of settlement gaps, it is worth reflecting on the Inspector's findings during the examination of the Eastleigh Local Plan (2011-2029). In his Post Hearing Note 3 – Other Matters to the Council, the Inspector raised concerns about the settlement gap policy, noting:

“I have seen nothing in the Council's evidence base that justifies, on a rigorous and comprehensive basis, the need for a gap designation, the choice of gap locations, or the extent of the designated areas.”

The Inspector further noted that even if the principle of settlement gaps is accepted, the criteria in Policy 15 of the South Hampshire Strategy would be a reasonable starting point for determining their extent. Policy 15 asserts that no more land than necessary to prevent coalescence should be included in settlement gaps. Although further guidance has since been published by the Partnership for South Hampshire (PfSH), the principles remain consistent. Notably these are set out in paragraph 7.61 of the Regulation 19 Local Plan. The Settlement Gap Review explains that LUC's approach is based on past experience in settlement gap studies and aligns with the roles of settlement gaps as outlined in PfSH's 2023 Spatial Position Statement and the 2008 Policy Framework for Gaps. The review includes a robust methodology, analysing factors such as settlement setting, physical and visual separation, and urbanising influences, to determine the extent to which land is distinct from urban areas. This analysis identifies key factors that preserve settlement separation, offering recommendations for which land should be included in each designated gap to prevent coalescence. This approach is supported by our client. However, the decision not to assess the Knowle-Wickham-Welborne Gap in this study lacks technical rigor and is unjustified and so our client strongly objects to Policy NE7 in its current form.

Notably, the Knowle-Wickham-Welborne Gap was defined in Local Plan Part 2 (LPP2) before the application at Welborne had been determined and therefore prior to knowing its form, layout and design. As a result, the settlement gap conditions at the time of designation may not reflect today's circumstances. The initial gap designation was likely larger than necessary, reflecting a precautionary approach due to the uncertainties surrounding Welborne's exact parameters.

We also have concerns that the reliance on outdated evidence to justify settlement gaps is also inconsistent with the Local Plan's reliance on windfall development to meet housing needs. As noted by previous representations, windfall sites within settlement boundaries are a diminishing resource.

	<p>Table H2 of the PSLP shows that after existing completions, planning permissions and other commitments, the remaining requirement totals 4,770 new dwellings to be delivered through the plan. Of this, only 2,875 dwellings will be provided through additional local plan allocations. This equates to 60% of the remaining requirement while 1,985 dwellings will be delivered through windfall development. This equates to 40% of the remaining requirement and demonstrates an even greater reliance on windfall development than that proposed through the Regulation 18 plan. Our client strongly objects to this strategy. This is because without allowing for some expansion of settlement boundaries, suitable windfall development opportunities will become increasingly limited, prejudicing the Council's ability to fulfil this strategy. In the case of Knowle and Wickham where there is a windfall requirement of 50 dwellings, the decision not to review the settlement boundary compounds this issue and emphasises the need to undertake a full review of the proposed gap. Therefore, our client strongly objects to the inclusion of settlement gaps without a full up-to-date, evidence-based assessment to justify their designation, location, and extent.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>It is crucial that the Knowle-Wickham-Welborne Gap is reviewed with the same rigor as other settlement gaps in Winchester District. This will ensure that the extent of the gap is both justified and effective, and importantly that no more land than is necessary to prevent the coalescence of settlements is included to maintain their physical and visual separation.</p> <p>In addition, the specific wording of Policy NE7 is overly restrictive in its reference to the "open and undeveloped nature" of gaps. This phrasing is not considered consistent with national policy or justified. Modifications are needed to clearly define settlement gaps within Winchester District. We recommend rewording the policy to adopt a positive, criteria-based approach to development within settlement gaps. This would ensure the policy focuses on the key functions of settlement gaps, grounded in proportionate and up-to-date evidence, making it both justified and effective.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>In the absence of a comprehensive review, our client contends that the Knowle-Wickham-Welborne settlement gap is unjustified, as it includes more land than is necessary to prevent settlement coalescence and maintain physical and visual separation between the settlements. Figure 1 below shows our suggested amendments to the settlement that are considered necessary.</p> <p>SEE FIGURE 1 in REP</p> <p>Land west of Mayles Lane</p> <p>The inclusion of Site KN1 (Ravenswood) is a key consideration to the suggested amendments above. Since the previous Local Plan defined the settlement boundary, the northern boundary of Knowle village has been substantially extended. As a result, the land to the northwest of Knowle and west of the Ravenswood allocation has become isolated from the wider settlement gap, diminishing its contribution to the gap's function compared to when it was originally assessed.</p> <p>Furthermore, the Meon River and the associated vegetation along its banks provide a robust and defensible boundary that would better define the western edge of the settlement gap. The land beyond the river is located entirely within the countryside, separated from the settlement boundaries of Knowle and Wickham by the watercourse and intervening vegetation. While this land may have some visual connection to the area</p>

east of the Meon, the existing countryside policies are considered sufficient to preserve the character of the area without the need to include this land within the settlement gap, thus preventing any dilution of its purpose.

Finally, the land west of Mayles Lane and south of Wickham Lodge, which follows the northern boundary of the Ravenswood development and the alignment of existing overhead power lines, comprises a mix of established uses, including commercial operations (such as our client's business at Pogles Wood and other businesses at Meon Valley Landscapes), Growing Places Children's Nursery, and a sewage treatment facility. These land uses create a developed character that aligns more closely with the defined settlement boundary of Knowle. This area is now disconnected from the wider settlement gap and no longer plays a significant role in defining settlement character or in maintaining the separation of settlements, making its inclusion in the settlement gap unnecessary.

Land at Dean Villas

The land at Dean Villas should be excluded from the designated settlement gap as it is physically and functionally distinct from the land known as Knowle Triangle and relates more closely to the defined settlement boundary of Knowle. Unlike the wider settlement gap, which plays a critical role in preventing coalescence between Knowle and surrounding settlements, this site is separated from the core open space that constitutes the Knowle Triangle and is effectively integrated with the adjacent built-up area. Its exclusion from the settlement gap would not undermine the overall function of the gap, as the revised eastern boundary would align with the established domestic curtilages of the residential properties that border the site. This adjustment would preserve the primary purpose of the settlement gap in maintaining physical and visual separation between settlements.

Moreover, the inclusion of the Dean Villas site within the settlement boundary for Knowle would provide a logical extension to the village, aligning with existing development patterns and creating opportunities for windfall development. The Regulation 19 Local Plan for Winchester relies on such windfall sites to meet its housing targets, and expanding the settlement boundary to incorporate this site would help ensure a sustainable supply of new homes. Given the diminishing availability of windfall sites within existing settlement boundaries, this adjustment would contribute positively to housing delivery without compromising the strategic objectives of settlement gap policies. Accordingly, we recommend that the settlement boundary for Knowle be expanded to include the Dean Villas site, supporting both local development needs and the overarching goals of the Local Plan.

Finally, we recommend rewording the policy to adopt a positive, criteria-based approach to development within settlement gaps. This would ensure the policy focuses on the key functions of settlement gaps, grounded in proportionate and up-to-date evidence, making it both justified and 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?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies) Letter (commenting on policies)

Policy/Evidence base document	NE7
Name of respondent (or client)	Bargate Homes Jonathan Quarrell
Personal reference number	BHLF-AQTS-3288-E
Full reference number	BHLF-AQTS-3288-E/8/NE7
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Paragraph 7.65 confirms that “It has been necessary to undertake a careful review of the Settlement Gaps in the Local Plan to ensure the gaps perform the function for which they were intended. An independent review of the Strategic Gaps provides an assessment of the existing Gaps and recommends proposed changes to the boundaries. Gaps provide a key opportunity to provide green infrastructure around the district, in addition to shaping and maintaining the settlement pattern. They are a valuable tool and the principle of maintaining gaps in these locations is retained.”</p> <p>5.6 We object to this, and must stress that Strategic Gaps do not provide a key opportunity to provide green infrastructure around the district. Designation of land as open space would, yes, but the Council would first need to buy land for open space. Instead, there should be recognition that planned development that includes open space is the most likely method of providing green infrastructure around the district.</p> <p>5.7 A new development which offered new open space on what was previously private inaccessible land is a very good way of securing green infrastructure in perpetuity.</p> <p>5.8 We remain concerned with an apparent obsession in the Hampshire area to avoid and prevent the so-called coalescence of settlements. This obsession stems from the introduction of ‘gaps’ in the days of Regional Plans and the South-East Plan.</p> <p>5.9 Times have changed, we are in the midst of a housing crisis and the Government has signalled its intentions to deliver the homes we need. Now is not the time to simply repeat the status quo. There must be a real and credible review of gaps.</p> <p>5.10 Paragraph 7.60 advises that the separate identity of settlements is an aspect highly valued by many communities, and the concept of gaps is an established spatial planning tool locally with policy included in the current Local Plan. It is also an important element sub-regionally with continued advocacy by PfSH.</p> <p>5.11 Our client has commissioned tor & co to review the matter, and their findings are provided at Appendix 1 of these Representations.</p> <p>29</p> <p>5.12 In our view, it is not right that because gaps are set out in the Adopted Local Plan that this somehow permits their automatic re-use in the Local Plan. Furthermore, the work of PfSH is non-statutory and the NPPF should take precedence.</p>

	<p>5.13 In our considered opinion, gaps are used by WCC and PfSH to prevent development and they have been very good at throttling growth. The substantial unmet need is a testament to this.</p> <p>5.14 Most worryingly, in our opinion, the Council has made no attempt to review or test whether or not the settlement gaps are fit for purpose, and test whether they would still meet their desired and intended purposes overall if they were adjusted to remove poorly performing areas of the settlement gaps that make no positive contribution to the gap.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies and evidence base) Letter (commenting on policies and evidence base - includes pictures and tables) Supporting document 1 (Map of site - Land at Winchester Road) Supporting document 2 (Briefing note - Winchester Settlement Gap)</p>

Policy/Evidence base document	NE7
Name of respondent (or client)	Georgina Cox
Personal reference number	BHLF-AQTS-328Q-7
Full reference number	BHLF-AQTS-328Q-7/18/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Gladman understand the use of policy NE7 is to maintain the separate identities between communities. The settlement gap is used as a spatial planning tool to prevent development merging nearby settlements together and diluting the individual characters of the areas.</p> <p>It is important for the plan to adhere to the sub-regional guidance and the Partnership for South Hampshire (PFSH) Framework. The PFSH states in its criteria for Councils designating settlement gaps in 'defining the extent of the gap, no more land than necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.'</p> <p>We therefore support the use of a settlement gap in the plan to the north of Otterbourne which separates the settlement from the South Downs development in Shawford. The gap is not excessive in scale and performs its purpose effectively.</p>
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? <i>All relevant information related to the specific policy or</i>	<p>Yes</p> <p>Form (refers to letter)</p> <p>Supporting information (commenting on policies and proposed site)</p>

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

Policy/Evidence base document	NE7
Name of respondent (or client)	VIVID Housing
Personal reference number	BHLF-AQTS-3287-D
Full reference number	BHLF-AQTS-3287-D/1/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>However, we also have concerns over the review of the settlement gaps in the Local Plan evidence base 1. The scope of the assessment appears unclear. The district-wide LUC Review gives no commentary or reassessment of the previous settlement gap assessments undertaken to inform Policy CP18 of the 2013 Local Plan.</p> <p>The report does not clarify whether all or part of the current settlement gaps perform in accordance with the 'definition' of a settlement gap in order to make judgements as to whether the boundaries should be adjusted, either expanding or reducing.</p> <p>Neither does the LUC Review include field work but appears to be a map-based exercise. This contrasts to other settlement gap reviews in neighbouring South Hampshire authorities, including Test Valley and Eastleigh. We conclude that this is the reason why only broad-brush considerations about gap alterations are given.</p> <p>Noting that Denmead has a requirement for housing sites from the Local Plan, and several of the SHELAA sites are in the Denmead-Waterlooville Settlement Gap, we would have expected that the LUC Review would have looked in greater detail at this gap, in line with Policy NE7, at how it functions, and whether there is capacity to adjust boundaries to facilitate sustainable development opportunities, such as Site DE22 in the Denmead-Waterlooville gap.</p> <p>For the Denmead-Waterlooville Gap2, only general comments are given. For example, the relevance of Hambledon Road is noted, which provides a direct link between the settlements, and that there is a risk of development along this route harming the function of the gap. In principle this is agreed. However, Site DE22 includes the northern most section of this road (on the southern edge of Denmead) and VIVID's vision for the development of the site includes reinforcing the green boundary along the road whilst also integrating the public open space at Goodman's Fields to improve pedestrian accessibility. The LUC Review has not considered this development concept, which was submitted at Draft Local Plan (Regulation 18) stage. Overall, therefore, we have concerns that the LUC Review is not at level of detail that it needs to be to positively inform the development strategy, not least for growth opportunities at Denmead.</p> <p>We also have concerns over the assessment of Site DE22 in the IIA. It has been assessed as having a 'major negative' score on heritage (IIA Objective 11[a] Heritage Impact). According to the IIA methodology, 'major</p>

	negative' means risk to heritage assets. This is at odds with the SHELAA, despite the IIA specifically stating that it uses the SHELAA for the assessment of Objective 11. . Reference to the SHELAA assessment for DE22 shows that there are no heritage impacts (all 'Historical Constraints' are categorised as 'green', as is Archaeology). The IIA scoring for DE22 is therefore inaccurate and should be reviewed. It should be recorded as "Negligible" (which is the most positive option in the IIA methodology for the heritage objective).
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies and evidence base)

Policy/Evidence base document	NE7
Name of respondent (or client)	Macra Ltd
Personal reference number	BHLF-AQTS-328W-D
Full reference number	BHLF-AQTS-328W-D/6/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Policy NE7 – Settlement Gaps</p> <p>The designation of settlement gaps is an accepted spatial planning tool to prevent settlements from merging with each other. With respect to those designated in Winchester City Council's plan area, the origins of these date back to the South and Mid Hampshire Structure Plans (1988 and 1989). There were subsequently carried forward into the Hampshire County Structure Plan 1994 and the Hampshire County</p> <p>45</p> <p>Structure Plan 1996-2011 and more recently have been a feature of the Local Development Plan. Winchester Council have identified a total of nine areas within the district where it is considered that the physical separation of distinct settlements within with district require specific protection to ensure that there is no risk of coalescence of those settlements which would diminish their separate identities.</p> <p>These areas of land are proposed to be formally designated as 'settlement gaps' on the basis that the Council consider these to be generally undeveloped and comprising open land. The majority of these allocations represent a continuation from the previous adopted Winchester Local Plan Part 1: Core Strategy (2013). The designation of such gaps is still considered important on a sub-regional basis as the PSLP confirms, with specific guidance on the criteria for designation of an open gap set out within the Partnership for Southern Hampshire (PfSH) document titled 'Policy Framework for Gaps' (December 2008).</p> <p>As the PfSH Policy Framework for Gaps confirms, settlement gaps 'are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations'.</p> <p>In this respect, they have little functionality in terms of providing green infrastructure or in increasing access for the public to greenspace on the periphery of their settlement. However, that is not to say that this cannot be a mutually performed role of such land and indeed at Paragraph 7.65 of the PSLP, the Council indicate that 'strategic gaps provide a key opportunity to provide green infrastructure around the district'. In order for this opportunity to be realised however, it is necessary to make it attractive and viable for landowners to make their land available for such purposes. There is no realistic likelihood of landowners giving up their land within settlement gaps for green infrastructure and open space without reasonable incentive.</p> <p>Where however opportunities do exist, such as at Wickham with the potential to allocate Land at Mayles Farm, Wickham, bringing forwards this site for housing development would enable publicly accessible green</p>

infrastructure to be secured in perpetuity, it is clear that this opportunity would accord specifically with the direction of the PSLP.

The PfSH Policy Framework for Gaps also confirms that, in defining the extent of a gap 'no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation'.

In this respect, the extent of the strategic gap designation between Wickham, Knowle and Welborne, appears excessive. The land which is included washes over existing dwellinghouses and built development along Hoad's Hill, which has a clear and established built character, and moreover substantially exceeds what is reasonably necessary to prevent coalescence. As discussed previously, per the 'Wickham Built Edge and Settlement Gap Plan' appended at ABs2, with the designation of Land at

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Mayles Farm, Wickham for housing development, the developed area of the allocation would simply round off Wickham settlement and still retain a significant open swathe of land which would serve equally well as a strategic gap without prejudice to its function and moreover would be provided in a manner that it could be protected and kept permanently open by taking the open greenspace into public ownership and providing a cohesive and connected network of greenspaces between Wickham, Knowle and Welborne Garden Village. This indeed accords with one of the fundamental aims of the PSLP at Policy WK3.

It is clear that previous settlement gap designations have been reviewed as part of new Local Plan making processes. This is indeed the case with respect to Knowle settlement, and the designation of the Ravenswood, Knowle site, which is to be released from the settlement gap for housing development, alongside open greenspace. The function of the removal of this land from the settlement gap is to reduce its extent, but for the same reason we consider that the release of Land at Mayles Farm, Wickham, is justified, the Council have considered that this would not prejudice the settlement gap. The estimated extent of the proposed built area at Ravenswood, Knowle is shown (ORANGE) on the adopted policies map excerpt below for reference.

Excerpt – Adopted Policies Map - Knowle

It should be noted that the designation of settlement gaps is not based on any National Planning Policy guidance or mechanism set out within the NPPF or statutory legislation. There is no requirement for such gaps to be identified, and indeed, it is not a feature of most strategic development plans.

This does not mean that the designation of strategic gaps is inappropriate, however there is a question whether this is reasonably necessary given the role of other statutory planning guidance and policy within the NPPF which serves to protect the character of existing settlements in any event.

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The Council have undertaken a fundamental review of the proposed settlement gaps within the evidence base document titled 'Settlement Gap Review – Winchester City Council' dated July 2024 ('the SGR'), which is intended to have informed its decision making in relation to the proposed settlement gaps within the PSLP.

There appears to be at the least a notable policy rub between the statements made within the SGR when read alongside the PfSH Policy Framework for Gaps, whereby the SGR discusses the settlement gaps as a means of identifying and protecting local landscapes including where these are sensitive, however the Policy Framework for Gaps confirms, settlement gaps 'are spatial planning tools designed to shape the pattern of settlements - they are not countryside protection or landscape designations'.

Indeed, the purpose of the settlement gap should be solely to prevent coalescence and it should not be used as a tool to protect what are considered to be sensitive landscapes or particular landscape character areas. There are other policy mechanisms set out within the NPPF that enable such protections.

The SGR confirms that the 'Welborne Gap' between the settlements of Wickham and Knowle and the Welborne Garden Village was first introduced within the Winchester Local Plan Part 1: Core Strategy (2013), under Policy CP18. The purpose of the designation of the settlement gap was noted to be:

To protect the individual character and identity of those settlements adjoining the proposed strategic development area at North Fareham, an area of open land is identified as a Gap to be maintained between the strategic development area and Knowle and Wickham (see Policy SH4). Development which would threaten the open and undeveloped character of this area will be resisted and the land should be managed to secure the long-term retention of its rural character

It is clear from the SGR that whilst seven of the nine settlement gaps across with Winchester Plan Area have been reviewed, that no review has been undertaken of the settlement gap between Wickham, Knowle and Welborne. Indeed, beyond confirming that this settlement gap remains in place, there is no meaningful discussion of these at all.

The SGR states that this has not been reviewed as permission has been granted for Welborne Garden Village and moreover that it is intended that the settlement gap will be used as open green space and infrastructure. This however is not quite correct. The Welborne Plan (2015) specifically designates buffer zones at the northern and western edges of the strategic allocation that are to comprise greenspace buffers to the Winchester Plan Area boundary and the settlements of Wickham and Knowle. The policy that governs these gaps is Policy WEL5 of The Welborne Plan (2015) and indeed this does not relate at all to the land outside of Fareham Borough Council's plan area. Policy WEL29 of The Welborne Plan governs the provision of open space and green infrastructure as part of the allocation, and likewise does not apply to land outside of the Fareham Borough Council plan area.

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It is incorrect to state that the settlement gap at Wickham and Knowle is designated to service the Welborne Garden Village. This is simply not the case.

There is little rationale for not reviewing the settlement gap and Wickham, Knowle, and indeed considering whether there are opportunities which will enable the land to actually be brought forwards for open greenspace, alongside an appropriate pattern of housing development, in a manner which will not prejudice the function and role of the gap, should have been fundamental to Winchester Council's consideration of the approach to development at Wickham and Knowle.

	<p>There has clearly been some thought given to this approach for Knowle, whereby the designation of the Ravenswood, Knowle allocation will enable an area of open greenspace to be permanently secured which forms part of the settlement gap, but this logical approach has not been extended to Wickham, indeed it appears to have expressly been dismissed without consideration.</p> <p>There is clear and demonstrable public benefit which would be gleaned from the allocation of Land at Mayles Farm, Wickham, and the securing of significant areas of open greenspace which would provide a connected pattern of green infrastructure between Wickham, Knowle and Welborne Garden Village, alongside the meeting of the housing needs of Wickham in a sustainable way.</p> <p>We do not consider that the PSLP is sound in this regard. The Council have not properly considered this important opportunity in a complex part of the Plan Area where there is significant opportunity to deliver a clear and sustainable vision for the communities of Wickham and Knowle, and a joined up approach with the Welborne Garden Village.</p> <p>We ask that the EIP Inspector give due consideration to introducing a specific hearing session in relation to Wickham settlement, the settlement gap between Wickham, Knowle and Welborne and indeed the omission site Land at Mayles Farm, Wickham.</p> <p>see PDF for further detail</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>Yes Form (listing policies and submitted document) Letter (commenting on Policies and Evidence base) Supporting documents (Landscape Appraisal and Maps)</p>

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Andy Key
Personal reference number	BHLF-AQTS-3284-A
Full reference number	BHLF-AQTS-3284-A/20/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Fails on being effective.</p> <p>This policy is not consistent with the Transport policies as it stands, nor with national policy. Many of the named gaps divide satellite settlements from larger villages or towns which contain employment and services that residents of the satellite settlements need to access.</p> <p>The Transport policies aim to provide safe, usable active travel routes between these locations. To be consistent, this policy should therefore make it clear that it does not preclude the creation of high-quality, well-surfaced, appropriately-lit active travel routes across the settlement gaps.</p> <p>Without this exception, there is a danger that policy NE7 will be used as an excuse for developers (and the highway authority) to avoid contributing to active travel routes between settlements, resulting in a failure to deliver on the Plan.</p> <p>Example: Hampshire County Council is currently seeking funding to build a high-quality, lit, cycle route between Winchester and Kings Worthy along the Worthy Road. This is vital for active travel aspirations in the Winchester area as it would enable residents of the Worthys to travel by cycle/e-bike to the services, educational establishments and employment areas of Winchester. As currently written, this policy would result in the rejection of the county council's plans.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	To be consistent with the Transport policies and national policy, this policy should make it clear that it does not preclude the creation of high-quality, well-surfaced, appropriately-lit active travel routes across the settlement gaps.
What is your suggested wording or text for the policy?	<p>Additional paragraph:</p> <p>"The Council will, however, support the development of high-quality active travel corridors (to LTN 1/20 standard) across these gaps with the aim of reducing motor traffic on the connecting roads."</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies) Letter (commenting on policies)

Policy/Evidence base document	NE7
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-328G-W
Full reference number	BHLF-AQTS-328G-W/20/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Wates understands the principle of Strategic Gaps and acknowledges the role that they play in preventing the coalescence of settlements. However, these Gaps risk becoming too much of a restriction to development. Typically, the purpose of having a 'gap' is to ensure that settlements are physically separated, and each retains its own character and identity. This is achieved through:</p> <ul style="list-style-type: none"> • Conserving the countryside between settlements • Maintaining the open (undeveloped) character • Recognising the distinctive character of the settlements and their setting. <p>Wates suggests that Land at Pudding Farm could be removed from the Winchester – Kings Worthy/ Headbourne Worthy Gap, without it having any material effect on the role of the Gap. Please see Pudding Farm Gap Review at Appendix B of this report.</p> <p>Land at Pudding Farm is located on the Winchester settlement edge. Bringing forward the site for residential development would not result in the coalescence of settlements, and subject to careful masterplanning and landscape mitigation, would not compromise the perception of the gap between the settlements.</p> <p>When the land at Pudding Farm is brought forward for development, it will deliver significant landscaping benefits. These benefits include accessible green space, which could be delivered alongside development at the edge of Winchester, plus improvements such as better accessibility to the surrounding landscape, longer-range foot and cycle paths, biodiversity, landscape and environmental enhancements, and improved management opportunities.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Necessary modification to the Policy</p> <p>7.13 The Council should review the general extent of its proposed "Settlement Gaps" to ensure that they are performing only a landscape function and are not an unjustified Green Belt (by another name). Specifically, Wates strongly believes that Land at Pudding Farm should be removed from the Winchester – Kings Worthy/ Headbourne Worthy Gap, without it having any material effect on the role of the Gap, to allow for its allocation as a development site.</p>

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

Policy/Evidence base document	NE7
Name of respondent (or client)	Whiteley Developments Ltd
Personal reference number	BHLF-AQTS-328H-X
Full reference number	BHLF-AQTS-328H-X/2/NE7
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website including attachments.</p> <p>Introduction</p> <p>1.1 The deletion of Policy NE7 has become much more significant given the new government's stated objective of substantially increasing the provision of housing. The new figure for Winchester requires an increase of 62% from 676 dwellings per annum to 1099 dwellings per annum.</p> <p>1.2 The government has provided a provisional arrangement to proceed with previous housing figures if the Local Plan has reached the Regulation 19 stage. The City Council has decided to take advantage of this concession, but it is essentially an interim position. Once the Local Plan Reg. 19 has been examined by an Inspector and adopted the Council must commence a new Local Plan and the new housing and other government requirements must be addressed.</p> <p>2.0 Proposed Reforms of the National Planning Policy Framework and Other Changes to the Planning System</p> <p>2.1 The new government published a draft version of the NPPF seeking views on its content. It also published a Consultation document that discussed the Proposed Reforms, and it sought responses to a wide range of issues. I have identified a number of the Reforms which, in my opinion, justify the deletion of the Gap Policy NE7 now. These extracts are quoted below:-</p> <p>The new Government campaigned on a mandate of reforming the planning system to enable the building of 1.5M new homes, to deliver the affordable homes we need, and to provide the employment space and infrastructure which is essential to boost our economy.</p> <p>2.2 To achieve this the new government is seeking to make this mandatory. Its states:-</p> <p>a. make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options; The new targets will mean councils must boost housebuilding in areas most in need, helping more people buy their own homes, removing the largest barriers to economic growth, and getting Britain building again.</p> <p>2.3 The government has advised that local authorities must plan for the higher figure. The government is reinforcing the "presumption" in favour of sustainable development. This "failsafe" is particularly important.</p>

improve the operation of 'the presumption' in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies; and, introducing new safeguards, to make clear that its application cannot justify poor quality development;

2.4 The shortage of affordable homes is recognised.

h. make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need on all housing development and that the planning system supports a more diverse housebuilding sector;

2.5 It is recognised that "communities must be involved in shaping development", but it doesn't believe that this is compatible with the use of 'intervention powers' to achieve it. This will create strife. This is supported in principle, but residents need more guidance on how they can shape their communities. This tends to be a means of opposing development rather than guiding it.

f. ensure communities continue to shape housebuilding in their areas, demanding universal local plan coverage from all local planning authorities, while making full use of intervention powers to build the houses we need if this is not achieved;

2.6 Neighbourhood Plans are an obvious demonstration of this. The figures proposed by the local authority tend to be low and the residents even oppose the low figure. The Denmead Neighbourhood Plan was required to provide 100 dwellings by the LPA. This is a settlement that could support at least a 1000 dwellings without breaching any significant constraints but the Steering Committee is opposed to even to 100 dwellings.

2.7 I am supportive of the objective to increase the use of brownfield land to achieve all forms of development. However, reviews of sites reveal that nothing is taking place. The former John Lewis building in Southsea was sold to a developer in 2021 but it has stood empty ever since. This accords with the government objective below:-

5. We have been clear that brownfield land must be the first port of call. We want to make clear that the principle of development should not be in question on brownfield land, and so we are consulting on an amendment to paragraph 124c out of the current NPPF, reinforcing the expectation that development proposals on previously developed land are viewed positively. This makes clear that the default answer to brownfield development should be yes.

2.8 The objective of increasing the provision of small sites is supported. It is considered that the criteria should be modified, and in addition, the Council should make specific allocations for small sites based upon the modified criteria.

Making the small site allocation mandatory 15. Small and medium sized builders are essential to meeting our housing expectations and supporting local economies. They also build out the majority of small sites. Their business models often rely on identifying and securing small sites and building them out quickly. The Government is concerned that SME housebuilders are not able to access the small sites that they need, and that local planning authorities are not bringing forward small sites in their plans to the level set out in the NPPF. 2.9 A separate representation has been made to the Local Plan in support for the development of small sites.

3.0 THE PFSH GUIDANCE

3.1 The organisation known as the Partnership for Urban South Hampshire (PUSH) prepared a document in 2008 that was intended to ensure a consistent approach to the provision of Gaps. The PUSH guidance was published in 2008. It established the following criteria.

- The open nature/sense of separation between settlements cannot be retained by other policy designations;

- The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;

- In defining the extent of the gap, no more land than is necessary to prevent coalescence of settlements should be included having regard to maintaining their physical and visual separation.

3.2 It is evident from Appeal Decisions that most of the 9 Gaps in the Winchester Local Plan fail these tests. GAP Policy CP18 now NE7 in the emerging Local Plan

3.3 BJC Planning objected to Policy NE7 at the previous stage of the Local Plan. There have been some significant developments recently. For example the Council agreed that a site in Whiteley Lane, Whiteley for two dwellings did not affect the function of the Gap (24/01343/OUT).

4.0 LAND ADJOINING LODGE GREEN, WHITELEY LANE, WHITELEY

4.1 Objections the Gap Policy at three Local Plans were rejected. However, two Inspectors in respect of successive planning appeals confirmed that the site was not in conflict with the Gap Policy and awarded costs on that point. However, the Council hasn't taken any action to recognise these decisions until very recently.

Planning Appeal Decision: APP/L1765/W/16/3153276

4.2 The Appeal Decision was received on 12th January 2017. This should have been a major breakthrough for the appellants as Inspector Ms Gibbons concluded emphatically that the appeal site was not in conflict with the Policy CP18 Settlement Gap. She stated that:-

The ridgeline and enclosed nature of the appeal site means that it cannot be viewed in the context of the separation of the two settlements. The position of development at Skylark Meadow which is between the settlements has isolated the appeal site in Strategic Gap terms. The site is a very small parcel of land within a large Strategic Gap and it does not assist in the intended role to define and retain the separate identity of settlements. These are characteristics which seem to me to be very particular to the appeal site. As a result of these factors, I consider that site no longer performs a role in the visual and physical separation of Whiteley and Fareham and the proposal would not diminish the Strategic Gap. For these reasons, I conclude that the proposal would not be in conflict with Policy CP18 of the LPP1. (paragraph 12).

4.3 The Inspector made a Partial Award of Costs in respect of the Gap Policy.

4.4 It is evident that the Local Plan was out of date by the time it was adopted in April 2017 because

Inspector Gibbons in her Appeal Decision dated January 2017 confirmed that the site was not in conflict with

the Gap Policy CP18 and her associated Cost Decision in March 2017 when she made a Partial Award of Costs on that point.

4.5 The Appeal and Cost Decisions in 2017 were not mentioned in the Committee Report when the subsequent application for two dwellings was considered in June 2019.

The Inspector's Appeal and Costs Decisions: February 2021

4.6 Inspector Robert Parker also confirmed that the site was not in conflict with the Policy CP18 Settlement Gap and he also awarded costs.

Planning Application: Erection of two detached dwellings and garages: (Ref:- 24/01343/OUT)

4.7 Another planning application was submitted in July 2024. The Officers' Report states that "Having regard to the conclusions reached previously in relation to the impact the proposed development (on the same site) would have upon the settlement gap and the more recent Settlement Gap Review, no conflict with LPP1 Policy CP18 has been identified to warrant a reason for refusal on this basis."

4.8 This means that after 20 years the Council has admitted that it has been wrong all along and that the Gap Policy CP18 is irrelevant.

I asked the Council to explain its decision to the local residents in Whiteley Lane and the other people who objected on the grounds that the site was in the Gap because I do not believe that this is my responsibility. However, the Case Officer, Liz Young has refused to do this.

4.10 She stated that:-

"It is not the role of the planning authority as decision maker to influence the content of any third party representations and therefore we do not intend to contact those who have made representations. They will be aware that full details of the application are published on the public access pages of our web-site, along with the delegated report and decision notice.

4.11 I do not believe that this advice is correct. It means that the Objectors may not realise that the Council has conceded that the site is not in conflict with the Gap Policy. Some of them might object to the Local Plan on the grounds that the site is in the Gap. These people have been misled.

5.0 THE ALPINES, SCHOOL LANE, KINGSWORTHY

5.1 An Inspector's Decision with regards to a site in School Lane, Kingsworthy for one dwelling also did not affect the function of the Gap. (APP/L1765/W/22/3310078).

5.2 The failure to review the Council's policy position when there is a clear issue with policies is not unique to Whiteley Lane. The planning application for one dwelling on a site in Kingsworthy was refused planning permission. One of the reasons quoted was that the site was contrary to the Gap Policy. However, the Inspector concluded in her decision that the proposal did not affect the functioning of the Gap (Appeal Decision 12 September 2023 The Alpines, School Lane, Kingsworthy (APP/L1765/W/22/3310078)).

5.3 An Article in the Hampshire Chronicle records the debate by Members of the Planning Committee. The Article states that:-

"Civic chiefs have refused plans for a new house to be built in a rural area near Winchester. The city council's planning committee had concerns over the location, in an area defined as a 'settlement gap' in the local plan.

... City council planning officers recommended that the plans be refused on the grounds of it being in the settlement gap.

Cllr Jane Rutter said: "I'm very happy to support the officer's recommendation. Kings Barton make it more important that we preserve the settlement gap."

Cllr Chris Edwards said: "I find it hard to accept the comment Cllr Rutter has made. It's in the settlement gap, but these houses are now in an established area of development."

The committee chairman, Cllr Therese Evans said: "It's an important strip of land as it separates settlements. The new local plan will stress the importance of local gaps. Building a house here will demolish the gap, visually and physically.

An enormous amount of effort has been put into the new local plan. I strongly believe the officer's recommendation is correct."

The committee voting in favour of refusing the application, with eight for and one abstention."

5.4 The Inspector agreed with Cllr Chris Edwards, who stated that:-

Therefore, the proposal would not encroach into the visual and physical gap created, in part, by Barton Meadows. As such it would maintain an important gap between developed areas and not harm that gap's open and undeveloped nature, as required, amongst other things, by LPP1 Policy CP18.

5.5 The Officers recommended refusal on the Gap issue. This misled the Members of the Planning Committee who gave strong support for the Gap Policy. The Members voted 8 in support of refusing planning permission with one abstention. The local residents had supported the application.

5.6 In this case, Landscape advice was set out in the Committee Report. It stated:-

Service Lead for Community - Landscape

Comment - The site is well screened from public view points, but lies in a designated gap between Headbourne Worthy and Winchester and therefore development within this area should be refused. However the policy does state that 'Within these areas only development that does not physically or visually diminish the gap will be allowed'.

5.7 The author of this 'Comment' was a Landscape Officer who claimed that the site was in the Gap. However, the same Landscape Officer was clearly in the best position to advise Members if the site 'physically or visually' diminished the gap or not. Perhaps he was unwilling to explain to Members that the site was not in conflict with the Gap Policy.

5.8 This is another case where an Inspector concluded that the development did not harm the functioning of the gap. It means that the Objectors may not realise that the Council has conceded that the site is not in conflict with the Gap Policy. The residents are in same predicament as those in Whiteley. Some of them might object to the Local Plan on the grounds that the site is in the Gap. These people have been misled.

5.9 The Council has made no attempt to consider the implications of this decision It is evident that the same situation exists in Whiteley Lane. The development would not harm the functioning of the gap.

6.0 Land adjoining Alexandra Cottage Lower Chase Road, Swanmore (APP/L1765/W/17/3174240)

6.1 This appeal was dismissed on grounds of conflict with the infilling criteria (6 dwellings) and conflict with the Swanmore to Bishops Waltham Gap. The same principle should have been applied to this case. The development did not harm the functioning of the gap.

6.2 The Swanmore to Bishops Waltham Gap also failed the tests in the Gap Policy. It was much longer than the 1250 metres in the Policy. There was no intervisibility which was another criterion. It was evident in this case too that the development would not harm the functioning of the gap.

7.0 ONLY GAP IN THE AREA THAT IS OF “SUBREGIONAL STRATEGIC SIGNIFICANCE”

7.1 The most extraordinary decision was the creation of the new ninth Gap – the Knowle-Wickham-Welborne Gap. This new Gap was added after Local Plan Part 2 was adopted in 2017. Inspector Payne had agreed to a new Policy SH4 which it was ostensible introduced to protect the area between Wickham and the Welborne SDA. The area extended as far as the Meon Gap.

7.2 The decision to introduce a Gap Policy in 2004 created issues of definition. The gaps introduced had widely varying characteristics. This was confusing. Inspector Nigel Payne presiding at the Examination of Local Plans Part 1 and 2 managed to add to the confusion. The County Council prepared a number of discussion papers on separate issues. HCC Policy Paper 15 referred specifically to the review of the role of Strategic Gaps and this Paper also recognised the issue that was raised by the concept of ‘sub regional gaps’.

7.3 Inspector Nigel Payne recognised that this may have been the “only gap in the area that is of subregional strategic significance” but it could not possibly be a settlement gap. It didn’t satisfy any of the tests in the PUSH Guidance. The Council and Inspector Payne should have created a separate subregional gap instead of setting aside all of the criteria and calling it a settlement gap.

7.4 This issue was compounded by the decision of Inspector Payne to agree to convert the seven local gaps in the Local Plan Review (Policy CE.2) to Settlement Gaps. These had different characteristics and shouldn’t have been covered by the same Policy. The Gap Policy covering the ‘subregional gap’ is now a vast area greater than the total area of the Welborne SDA. On the other hand, the distance was minimal in the case of Otterborne-Shawford Gap and it backed on to the M3 and on the western side. The ‘open’ area was very small and the contrast with the Meon Gap could hardly be greater. There is no consistency.

7.5 In 1993, the Panel examining the County Structure Plan drew attention to these issues. They were very critical of the number and extent of strategic and local gaps proposed in South Hampshire. Paragraph 3.101 expresses clearly the problems with the policy, it states:-

“We were particularly concerned by what appeared to us to be a tendency to identify as strategic, gaps which were of purely local, if any, significance, or gaps which were not gaps at all but substantial tracts of land, or gaps simply as a means of preventing development. We were further concerned by the way in which many of these gaps were delineated in Local Plan, frequently tight against existing built up areas”. (my italics).

7.6 Inspector Nigel Payne didn’t need to read the Report published in 1993 to appreciate that the Gaps in Winchester District were simply a means of preventing development. There was no evidence that there was

any ‘threat of coalescence’. Inspector Payne should have realised that the same criteria could not apply to a gap of “subregional strategic significance” with the upgraded local gaps?

7.7 This also led to the extraordinary decision to create a new strategic gap based on the new Policy SH4. This became the ninth Gap in the Emerging Local Plan but this Gap had a common boundary with the Meon Settlement Gap to create a vast area of protection – a ‘mini’ Green Belt! (see BJC Plan 4 Emerging Local Plan Reg 18 showing the two gaps).

7.8 The new ninth gap, now known as the Knowle - Wickham - Welborne Gap has been added to the list of Gaps. The Whiteley – Fareham/Fareham Western Wards (the ‘Meon Gap’) has been retained but the boundary has been moved. How can a boundary be moved? The River Meon has been replaced by the Eastleigh to Fareham railway line. This Line now forms the eastern boundary (contrary to the PUSH guidance and HDC 11 that refer to natural and manmade barriers).

7.9 The western boundary of the new ninth Gap is also the Eastleigh to Fareham railway line. The two Gaps have a common boundary! This is simply ridiculous. It cannot be possible to have two gaps with a common boundary. It is really one vast area, but it cannot be described as a gap. I do not believe that it can be justified. It certainly isn’t a settlement gap, so it needs a new name just as the Report on the County Structure Plan Paper 15 proposed in 1993! Obviously, there are no settlements at risk of coalescence because there is no land or settlements between the two gaps.

7.10 Paper 15 recognized that the ‘Scale of Strategic Gaps’ could lead to confusion. Some may “encompass ..huge tracts of countryside” where “the use of the strategic gap label would be potentially confusing Then “it may be better that they should be called something like regional or sub-regional gaps”.

7.11 Inspector Nigel Payne failed to appreciate this point when he discussed the Meon and Knowle-Wickham-Welborne proposal. He referred to the issue of ‘sub-regional gaps’ but he decided to create two large co-joined settlement gaps without distinguishing them from other gaps. The Council has set aside the guidance to create this bizarre situation.

7.12 The northern boundary of the new ninth gap is Wickham Village. This is 1.77 kms from the railway line. This was contrary to the EiP Panel’s rejection of the proposed Meon Strategic Gap, which stated that:- The Meon Valley Gap clearly serves a strategic purpose in separating the major built-up areas in South Hampshire, with Southampton to the west and Fareham and Gosport to the east. But it too is very extensive and takes in some 6km of coastline where the risk of coalescence is virtually nil notwithstanding the other coast and countryside policies in the HCSPR. Winchester City Council suggest that the gap should be extended northwards beyond the railway and reach up to Wickham. This is a case of extending a gap to find a settlement when the motorway, let alone railway, is an appropriate physical barrier to curtail development.

7.13 The Meon Gap and the land identified in SH4 failed every principle in the EiP Reports, the PUSH guidance and even the tests in the Policy CP18 itself. If the Council wanted to protect character and identity of settlements in the vast area between Whiteley and the SDA, surely it should have created a new site specific Policy. It has simply ignored its own guidance.

	<p>8.0 OTHER POINTS</p> <p>8.1 It is not clear what 'not affecting the function of the Gap' means? Should the Gap be amended. What then is the purpose of the Gap?</p> <p>8.2 The principal objective of the Gap Policies is to prevent the coalescence of development, but it often applies to settlements that are the most sustainable and it mainly affects small sites, the large sites are often supported to meet the housing requirement.</p> <p>8.3 Why is Policy NE7 included in the Section on Nature and Environment Policy?</p> <p>8.4 It must be recognised that Gap Policy NE7 is an unjustified extra hurdle for the development of small sites and the Policy should be deleted. It is in conflict with the guidance on sustainability.</p> <p>9.0 SOUNDNESS</p> <p>9.1 The Gap Policy should be deleted. Two Inspectors have concluded that two sites are not in conflict with the Policy and the Council in respect of a recent planning application has finally reached the same conclusion.</p> <p>Local Plans must be prepared in accordance with the National Planning Policy Framework (NPPF). 9.2 The NPPF states that a Local Plan is 'sound' if it meets the following tests:- Positively prepared 9.3 I do not believe that the Local Plan was positively prepared. The Gap Policies should have been deleted before it was published. It is misleading because it didn't address the decisions that found that the sites were not contrary to the Policy. It is not guided by sustainability.</p> <p>Justified 9.4 I do not believe that the Gap Policy is justified and it should have been deleted. Effective 9.5 The Local Plan has a very short timeframe as it needs to be reviewed immediately after it is approved by an Inspector. In effect, this is an "Interim Local Plan". Consistent with national policy 9.6 The Local Plan does not enable the delivery of sustainable development in accordance with the emerging policies of the National Planning Policy Framework and other statements of national planning policy. Local Residents 9.7 Local residents should have been advised that the Gap Policy was not relevant to development in three areas, Whiteley and Kingsworthy and probably Swanmore. This is exceptionally misleading. The Local Plan should be withdrawn so that these residents can be reconsulted.</p> <p>Appendices</p> <ol style="list-style-type: none"> 1. Planning Appeal Decision: APP/L1765/W/16/3153276 2. Planning Appeal Decision: The Alpines, School Lane, Kingsworthy 3. Planning Appeal Decision: Land adjoining Alexandra Cottage Lower Chase Road, Swanmore (APP/L1765/W/17/3174240) 4. Decision Notice dated 5 September 5. Officers Report 6. HDC Document on Gaps published in 2016 7. Plan 4: showing the relationship between the Meon Gap and the Knowle-Wickham-Welborne Gap
<p>What modification(s) are necessary to make the</p>	<p>Please delete this policy</p>

<p>policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (NE7 - refers to letter) Form (small sites) Letter 1 (Comments on NE7) Letter 2 (Comments on H3 and H4) Letter 3 (re Land adjoining Lodge Green, Whiteley Lane) Supporting Document 1 (Landscape appraisal - Figures) Supporting Document 2 (Landscape and visual impact appraisal)</p>

Policy/Evidence base document	NE7
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/13/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Harding Holdings supports the Settlement Gaps policy. The Policy maps does show these gaps, but there is no mention of this with the supporting text or policy wording. The Bishops Waltham settlement gap is fairly extensive, and it would be beneficial for readers of the plan to be directed to an inset plan or the interactive policies map.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (Commenting on policies and evidence base) Supporting information (Map)

Policy/Evidence base document	NE7
Name of respondent (or client)	Cllr Sue Wood
Personal reference number	ANON-AQTS-32NV-2 - Sparsholt Parish Council
Full reference number	ANON-AQTS-32NV-2 - Sparsholt Parish Council/1/NE7
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Sparsholt Parish Council have considered the REG19 Consultation and have no issues. However there was no place in the consultation to add additional comments.</p> <p>We are again asking that you consider our request for Sparsholt to be added to the Strategic Gaps within the New Local Plan. A map of our proposed area is attached.</p> <p>We are fully aware that we have had no allocations for new housing but a major Developer is presently consulting the public for 200plus houses on Land at Lanham Lane which does border our boundary. This land is currently not on your list for development, However with the new government set to insist on many more developments we are feeling extremely vulnerable. We hope that you are able to support this not unreasonable request.</p>
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? <i>All relevant information related to the specific policy or allocation has already been</i>	Yes

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE8 South Downs National Park	
Total Number of Representations received	10	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	7	1
Sound	4	5
Complies with Duty to Cooperate	8	0
<p>Summary of Representations Some representations support the policy.</p> <p>Others request clearer policy wording, with regard to the ambiguity of terms like ‘in close proximity,’ which leads to inconsistencies with the National Planning Policy Framework (NPPF) para 182. Suggest this is replaced with ‘the setting of’ to better align with national guidelines. Respondents also emphasise the importance of defining policy aims clearly to enhance clarity and effectiveness. There is also a strong emphasis on ensuring developments respect and conserve the Park’s unique qualities.</p> <p>The additional paragraph included at the end of Policy NE8 should also be deleted as policy to protect National Parks is already set out in the NPPF.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3B6N-J/2/NE8 ANON-AQTS-3BSY-T/60/NE8 ANON-AQTS-3BPH-6/6/NE8 ANON-AQTS-32CU-P/2/NE8 ANON-AQTS-32CD-5 - Colden Common Parish Council/34/NE8 ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/7/NE8 ANON-AQTS-32N8-4 - Badger Farm Parish Council/1/NE8 ANON-AQTS-329Q-8/29/NE8 BHLF-AQTS-328K-1/12/NE8 BHLF-AQTS-32QZ-9/5/NE8</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • The need to clarify terms used within the policy to ensure that the policy is effective and can be applied consistently. • Policy needs to align more with NPPF. 		

Policy/Evidence base document	NE8
Name of respondent (or client)	Philip Greenish
Personal reference number	ANON-AQTS-3B6N-J
Full reference number	ANON-AQTS-3B6N-J/2/NE8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Policy NE8 is strongly supported
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE8
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/60/NE8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	National Parks are very important and should be protected at all costs.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE8
Name of respondent (or client)	ReAssure Limited c/o Legal & General Real Assets
Personal reference number	ANON-AQTS-3BPH-6
Full reference number	ANON-AQTS-3BPH-6/6/NE8
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>As set out in our representations to the Regulation 18 Consultation, the policy requires development adjoining the National Park to accord with the statutory purposes and duty for National Parks, as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 and which are summarised at paragraph 7.68 of the current Regulation 19 Consultation.</p> <p>However, we maintain our position that it is unclear how the development of sites outside of the Park can be required to accord with the statutory purposes and duty for the National Park themselves. It is clear from the Council's Consultation Comments that the intention of the policy is to ensure that development on land adjoining the National Park should not affect or conflict with the ability of the Park to continue to carry out its statutory purposes / duty. It is therefore recommended that the Policy itself be amended to make that clear, rather than requiring development sites to accord with the statutory purposes and duty, which they themselves cannot.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>As set out in our representations to the Regulation 18 Consultation, the policy requires development adjoining the National Park to accord with the statutory purposes and duty for National Parks, as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 and which are summarised at paragraph 7.68 of the current Regulation 19 Consultation.</p> <p>However, we maintain our position that it is unclear how the development of sites outside of the Park can be required to accord with the statutory purposes and duty for the National Park themselves. It is clear from the Council's Consultation Comments that the intention of the policy is to ensure that development on land adjoining the National Park should not affect or conflict with the ability of the Park to continue to carry out its statutory purposes / duty. It is therefore recommended that the Policy itself be amended to make that clear, rather than requiring development sites to accord with the statutory purposes and duty, which they themselves cannot.</p>
What is your suggested wording or text for the policy?	As set out in our representations to the Regulation 18 Consultation, the policy requires development adjoining the National Park to accord with the statutory purposes and duty for National Parks, as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 and which are summarised at paragraph 7.68 of the current Regulation 19 Consultation.

	<p>However, we maintain our position that it is unclear how the development of sites outside of the Park can be required to accord with the statutory purposes and duty for the National Park themselves. It is clear from the Council's Consultation Comments that the intention of the policy is to ensure that development on land adjoining the National Park should not affect or conflict with the ability of the Park to continue to carry out its statutory purposes / duty. It is therefore recommended that the Policy itself be amended to make that clear, rather than requiring development sites to accord with the statutory purposes and duty, which they themselves cannot.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (Commenting on policies)</p>

Policy/Evidence base document	NE8
Name of respondent (or client)	Carl Dixon
Personal reference number	ANON-AQTS-32CU-P
Full reference number	ANON-AQTS-32CU-P/2/NE8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	I support this policy as drafted
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE8
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/34/NE8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE8
Name of respondent (or client)	South Downs National Park Authority (SDNPA)
Personal reference number	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)
Full reference number	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/7/NE8
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	The National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act 2023, requires all relevant bodies – including Winchester City Council (WCC) – to seek to further the purposes of the South Downs National Park (SDNP). The National Park purposes are: 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. We welcome the retention of this policy and its update to include references to conserving and enhancing the intrinsic quality of the South Downs International Dark Sky Reserve. However, to ensure that the policy is effective and consistent with national policy, we request that: Paragraph 7.68 and the policy wording is updated in light of the enactment of Section 245 of the Levelling Up & Regeneration Act 2023 and its strengthened wording; and the policy wording is amended to replace “close proximity” with “the setting of” to align with NPPF Paragraph 182.
What modification(s) are necessary to make the policy legally compliant or sound?	The National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act 2023, requires all relevant bodies – including Winchester City Council (WCC) – to seek to further the purposes of the South Downs National Park (SDNP). The National Park purposes are: 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. We welcome the retention of this policy and its update to include references to conserving and enhancing the intrinsic quality of the South Downs International Dark Sky Reserve. However, to ensure that the policy is effective and consistent with national policy, we request that: Paragraph 7.68 and the policy wording is updated in light of the enactment of Section 245 of the Levelling Up & Regeneration Act 2023 and its strengthened wording; and the policy wording is amended to replace “close proximity” with “the setting of” to align with NPPF Paragraph 182.
What is your suggested wording or text for the policy?	The National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act 2023, requires all relevant bodies – including Winchester City Council (WCC) – to seek to further the purposes of the South Downs National Park (SDNP). The National Park purposes are: 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

	<p>We welcome the retention of this policy and its update to include references to conserving and enhancing the intrinsic quality of the South Downs International Dark Sky Reserve. However, to ensure that the policy is effective and consistent with national policy, we request that: Paragraph 7.68 and the policy wording is updated in light of the enactment of Section 245 of the Levelling Up & Regeneration Act 2023 and its strengthened wording; and the policy wording is amended to replace “close proximity” with “the setting of” to align with NPPF Paragraph 182.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>No, I don't want to take part in a hearing session</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Email (Commenting on NE8) Letter (Commenting on policies) Email correspondence (Re policy NE8)</p>

Policy/Evidence base document	NE8
Name of respondent (or client)	Mrs. Christine Howe, Clerk/Responsible Finance Officer to Badger Farm Parish Council
Personal reference number	ANON-AQTS-32N8-4 - Badger Farm Parish Council
Full reference number	ANON-AQTS-32N8-4 - Badger Farm Parish Council/1/NE8
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE8 – South Downs National Park. In seeking to limit the scope of policy NE8 to “development in close proximity” to the South Downs National Park, it is not in accordance with the NPPF, which requires that development within the “setting” of National Parks “should be sensitively located to avoid or minimise adverse impacts”. While on first reading seemingly minor, the limiting of the consideration of potential adverse impacts to development that is in close proximity risks significant harm to the protected landscape of the National Park as this takes no account of the scale or potential intrusiveness of any proposed development. Furthermore, while Policy NE8 makes reference to amendments to the National Parks and Access to the Countryside Act 1949 by the Environment Act 1995, it does not reference the significant change to Part 2, Section 11A introduced by the Levelling Up and Regeneration Act 2023. Part 12, Section 245 of the Levelling Up and Regeneration Act 2023 amended the National Parks and Access to the Countryside Act 1949 to strengthen the duty of relevant authorities towards National Parks, the amended text stating: “In exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority ... must seek to further the purposes specified in section 5(1) and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.” (Part 2, Section 11A, National Parks and Access to the Countryside Act 1949) While the change in the policy from the Regulation 18 draft, which sought to restrict the application of the policy to “development adjoining”, to the current “in close proximity” is welcomed, Badger Farm Parish Council considers the current proposed policy unsound as currently drafted due to its divergence from National Planning Policy and its failure to reflect legislative change since the publication of the Regulation 18 draft plan. The Parish Council consider that the policy can be made sound by altering the proposed text from “Development in close proximity the South Downs National Park ...” to read “Development within the setting of the South Downs National Park ...”.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (copy of form - response detailed in letter) Letter (commenting on policies)

Policy/Evidence base document	NE8
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/29/NE8
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The revised policy provides more detailed guidance and expectations compared to the previous iteration within the regulation 18 plan. The regulation 19 policy introduces additional details about development proposals being "expected to take account of the National Park assessments of landscape and tranquillity" and that they should "demonstrate how a proposal conserves and enhances the special qualities of the Park." Bloor Homes agrees that development within the setting of the National Park should be sensitively located and designed. However, the policy text as currently wording goes beyond this, referring instead to the statutory purposes of National Parks.</p> <p>The policy as drafted does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p>It should be amended as follows:</p> <p>‘Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas and take account of the national park’s status as an International Dark Sky Reserve.’</p> <p>Whilst the draft allocation Land at Mill Lane, Wickham (Policy WK5) is close to the South Downs National Park, it is outside this designation and will be appropriately designed to avoid or minimise impacts on the national park, as required by the NPPF.</p> <p>The previously submitted masterplan submitted with Bloor’s regulation 18 representation includes land to the north of draft allocation WK5, in proximity to the national park. The masterplan responds to this by identifying the northern area as an open area, thus minimising impacts on the national park. A new copse and tree planting could act as a landscape buffer along the northern boundary of the residential development to further strengthen the containment of the site, protecting the setting of the National Park.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The revised policy provides more detailed guidance and expectations compared to the previous iteration within the regulation 18 plan. The regulation 19 policy introduces additional details about development proposals being "expected to take account of the National Park assessments of landscape and tranquillity" and that they should "demonstrate how a proposal conserves and enhances the special qualities of the Park."

	<p>Bloor Homes agrees that development within the setting of the National Park should be sensitively located and designed. However, the policy text as currently wording goes beyond this, referring instead to the statutory purposes of National Parks.</p> <p>The policy as drafted does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p>It should be amended as follows:</p> <p>‘Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas and take account of the national park’s status as an International Dark Sky Reserve.’</p> <p>Whilst the draft allocation Land at Mill Lane, Wickham (Policy WK5) is close to the South Downs National Park, it is outside this designation and will be appropriately designed to avoid or minimise impacts on the national park, as required by the NPPF.</p> <p>The previously submitted masterplan submitted with Bloor’s regulation 18 representation includes land to the north of draft allocation WK5, in proximity to the national park. The masterplan responds to this by identifying the northern area as an open area, thus minimising impacts on the national park. A new copse and tree planting could act as a landscape buffer along the northern boundary of the residential development to further strengthen the containment of the site, protecting the setting of the National Park.</p>
What is your suggested wording or text for the policy?	<p>The revised policy provides more detailed guidance and expectations compared to the previous iteration within the regulation 18 plan. The regulation 19 policy introduces additional details about development proposals being "expected to take account of the National Park assessments of landscape and tranquillity" and that they should "demonstrate how a proposal conserves and enhances the special qualities of the Park."</p> <p>Bloor Homes agrees that development within the setting of the National Park should be sensitively located and designed. However, the policy text as currently wording goes beyond this, referring instead to the statutory purposes of National Parks.</p> <p>The policy as drafted does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p>It should be amended as follows:</p> <p>‘Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas and take account of the national park’s status as an International Dark Sky Reserve.’</p> <p>Whilst the draft allocation Land at Mill Lane, Wickham (Policy WK5) is close to the South Downs National Park, it is outside this designation and will be appropriately designed to avoid or minimise impacts on the national park, as required by the NPPF.</p> <p>The previously submitted masterplan submitted with Bloor’s regulation 18 representation includes land to the north of draft allocation WK5, in proximity to the national park. The masterplan responds to this by identifying the northern area as an open area, thus minimising impacts on the national park. A new copse and tree</p>

	planting could act as a landscape buffer along the northern boundary of the residential development to further strengthen the containment of the site, protecting the setting of the National Park.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)

Policy/Evidence base document	NE8
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/12/NE8
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Winchester College did not make representations at the Regulation 18 consultation stage and is now making comments directly related to changes to the wording of this Policy at the Regulation 19 stage.</p> <p>Policy NE8 has been amended to require development ‘in close proximity’ to the South Downs National Park to be expected to take account of the National Park assessments of landscape and tranquillity and demonstrate how a proposal conserves and enhances the special qualities of the Park.</p> <p>Winchester College objects to the amendment to Policy NE8, which changes the text from ‘adjoining’ to ‘in close proximity’ to the South Downs National Park. The policy and supporting text do not define what is meant by ‘in close proximity’ therefore, the policy is ambiguous, and it is not clear how this policy should be applied. In addition, the wording ‘in close proximity’ is not consistent with the National Planning Policy Framework (NPPF) which refers to development in the ‘setting’ of National Parks ‘should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas’ (NPPF 2023, paragraph 182). The additional paragraph included at the end of Policy NE8 should also be deleted as policy to protect National Parks is already set out in the NPPF.</p> <p>The College, therefore, requests that the policy is amended as follows (suggested additional text is underlined):</p> <p>Amendments to policy Development in the setting of the South Downs National Park will only be permitted where it would be in accordance with the statutory purposes and duty for National Parks as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	...’Non-residential development (excluding change of use) should meet the BREEAM
What is your suggested wording or text for the policy?	The College requests that the policy is amended as follows (suggested additional text is underlined): Amendments to policy Development in the setting of the South Downs National Park will only be permitted where it would be in accordance with the statutory purposes and duty for National Parks as specified in the

	National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)

Policy/Evidence base document	NE8
Name of respondent (or client)	Croudace Homes (Alison Walker)
Personal reference number	BHLF-AQTS-32QZ-9
Full reference number	BHLF-AQTS-32QZ-9/5/NE8
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This policy is of concern for Croudace. Winchester CC, in this policy, fails to recognise that just because a site is in close proximity (undefined distance) that it contributes to the setting of the protected landscape.</p> <p>5.9 It is recommended that the policy wording is more akin to the following (Horsham District Council proposed policy Strategic Policy 16: Protected Landscapes Submission Version): Proposals within land that contributes to the setting of the South Downs National Park should be consistent with National Park purposes and have regard to the South Downs Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan and any other relevant document and updates. In particular, proposals should not cause harm to the special qualities (including dark skies), local distinctiveness or sense of place, by negatively affecting views into and out of the National Park. Proposals will be required to set out any proposed mitigation or compensation measures needed to address any harm.</p> <p>5.10 It is felt that the current policy wording is not appropriate or specific. The above suggested policy wording recognises that not all land will contribute to the setting of the SDNP. Croudace object to the current wording of the policy.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	reword policy
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

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (refers to letter) Letter (commenting on policies and evidence base) Supporting document 1 (Vision Document) Supporting document 2 (Map - Land east of Highbridge Road, Colden Common) Supporting document 3 (Indicative layout)</p>
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WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to Policy NE8 and paragraphs 7.68, 7.69, 7.70, 7.71, 7.72 as agreed with the South Downs National Park Authority

Local Plan Reference or document	Policy NE9 Landscape Character	
Total Number of Representations received	10	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	6	2
Sound	4	5
Complies with Duty to Cooperate	7	1
<p>Summary of Representations Support is expressed for the policy and in particular references to the key management strategies outlined in the Landscape Character Assessment (LCA) and the protection of Fort Southwick and Fort Nelson.</p> <p>Request that criterion vi) should include some flexibility such that where it is necessary to amend green or blue corridors to achieve greater sustainability benefits, then an appropriate scheme of compensation will be required, prioritising other opportunities for these corridors within the site.</p> <p>Policy lacks protection for valued landscapes - the need to protect valued landscapes is recognised in proposed Policy NE1 paragraph 7.22 which states that that "Valued landscapesshould be protected and enhanced", following the wording of NPPF 180(a). However this recognition is not carried forward to the text of the Policy itself.</p> <p>A respondent objects to the changes to the policy in the Reg 19 version of the local plan and inclusion of the requirement for 'A Landscape Visual Appraisal' (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development must be provided in order to assess potential harm to the character of the area'. The policy needs to identify which scale and type of development this is applicable to, as it is not proportionate to require all minor development proposals to provide a Landscape Visual Appraisal' (LVA) or a Landscape Visual Impact Assessment (LVIA).</p>		
<p>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/6/NE9 ANON-AQTS-3BRX-R/1/NE9 ANON-AQTS-3BSY-T/11/NE9 ANON-AQTS-32CD-5 - Colden Common Parish Council/8/NE9 ANON-AQTS-329Q-8/4/NE9 ANON-AQTS-32G7-V/2/NE9 BHLF-AQTS-32EU-R - Hursley Parish Council/1/NE9</p>		

BHLF-AQTS-3267-B/2/NE9

BHLF-AQTS-328K-1/3/NE9

BHLF-AQTS-32Q2-1 – Portsmouth City Council/3/NE9

Main issues raised in representations received in regulation 19 consultation

- Need to clarify policy to be proportionate to different scales and forms of development
- Policy lacks flexibility in terms of green or blue corridors and the need for these to be adjusted to allow for other benefits.
- Policy should reflect valued landscapes

Policy/Evidence base document	NE9
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Email correspondence (between officers and Historic England) Email correspondence (between officers and Historic England re: suggested changes)

Policy/Evidence base document	NE9
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/6/NE9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The landscape of the district is very important to its character and function. The policy permits new development where it protects and enhances the district's distinctive landscape character. The Parish Council supports the policy. Support Policy NE9
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	NE9
Name of respondent (or client)	Christopher Napier
Personal reference number	ANON-AQTS-3BRX-R
Full reference number	ANON-AQTS-3BRX-R/1/NE9
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>See comments and submission re Policy NE1: CPRE Hampshire considers Policy NE1 with Policy NE9 is not justified or consistent with national policy for the reasons set out below:</p> <p>1) these policies do not provide for protection of "valued landscapes"</p> <p>It is clear from the Vision that enhancement of the natural environment is key strategy of this Local Plan, including specifically natural beauty, biodiversity and cultural heritage. This strategy has our strong support. Accordingly, our strong support is given also to the Objectives designed to achieve those aspirations, notably; by prioritising the development of brownfield land (Objective ii); to conserve and enhance Winchester Districts valuable environments including both the urban and rural areas as well as the built, historic and natural environments (Objective iii); and to ensure that development does not have an adverse impact on landscape character or the unique and special characteristics of the national park (Objective iv).</p> <p>We note also proposed Policy NE1 paragraphs 7.6 and 7.7 stating the need to protect the countryside from unplanned and large-scale development, recognising the intrinsic character and beauty of the countryside (as required per NPPF), and noting that one of the key aims of the Local Plan is to concentrate development within the most sustainable locations and to protect the countryside from unnecessary development. In implementing the Objectives outlined above, these aims have our strong support.</p> <p>It has long been a key strategy of the Council to protect and enhance the natural beauty of the area before and after the advent of the South Downs National Park. Natural beauty encompasses landscape and scenic quality, relative tranquillity and natural heritage features. This key strategy is rightly carried forward to this Plan in the manner set out above in the Vision, Objectives, and the wording of proposed Strategic Policy NE1.</p> <p>However, as regards landscape the 2023 NPPF paragraph 180(a) states:</p> <p>180. Planning policies.....should contribute to and enhance the natural and local environment by:</p> <p>a) protecting and enhancing valued landscapes,(in a manner commensurate with their.....identified quality in the development plan).</p> <p>The wording of this paragraph is not proposed to be altered in the current proposed amendments to the NPPF.</p>

The meaning of "valued landscapes" is not defined within the NPPF, but it has become established and accepted by way of court judgments and Inspectors and Secretary of State decisions that a 'valued landscape' is a landscape outside a "designated landscape" (i.e., national park or AONB) that is more than 'mere countryside' but is a landscape that has sufficient demonstrable physical attributes to take it beyond ordinary landscape or 'out of the ordinary'. It is similarly established and accepted that development in a valued landscape should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused, and that this is a material consideration to be taken into account in the decision-making process.

This need to protect valued landscapes is recognised in proposed Policy NE1 paragraph 7.22 which, states that that "Valued landscapesshould be protected and enhanced", following the wording of NPPF 180(a). However this recognition is not carried forward to the text of the Policy itself.

While Policy NE9 on Landscape Character has our support, the process of Landscape Character Assessment which underpins Policy NE9 has the object only of identifying what makes one area "different" or "distinct" from another. Often it also identifies relevant issues and planning considerations but it is nevertheless a separate process from landscape evaluation, which concentrates on relative value. Landscape Character Assessment does not identify any landscape as "valued" and so Policy NE9 makes no specific provision for protecting and enhancing "valued landscapes" as required by the NPPF.

The fact that the landscape of the plan area (ie outside the national park) contains landscape of high value is acknowledged within the wording of the Plan along with the need for a key strategy to protect and enhance its natural beauty. Also the specific reference to valued landscapes in Policy NE1 paragraph 7.22. It is confirmed by the fact that at the link below is a Policies Map from the 1999 Local Plan showing areas designated as Areas of Special Landscape Quality.

[ASLQ-Designation.pdf \(cprehampshire.org.uk\)](https://www.cprehampshire.org.uk/ASLQ-Designation.pdf)

Such local landscape designations were discouraged by central government in England and so not carried forward into the current Local Plan; but CPRE Hampshire can assert from its own knowledge that, on the whole, the quality of these areas of landscape remains high and if reassessed would qualify as "valued landscape". Indeed, in assessing landscape in planning applications, it is acknowledged that some landscape is "valued landscape" and that this is a material consideration. For example, see the Officers Report to the Planning Committee in 23/01025/FUL (Land South Of Crabwood, Sarum Road, Sparsholt, Hampshire) in which it is acknowledged that "the higher test as set out in para 180(a) NPPF applies".

In its analysis of the comments made in the Regulation 18(2) consultation which called for protection for "valued landscape" (including from CPRE Hampshire) the Council considered that the case law on the subject is contradictory, and accordingly it would not be appropriate to add this protection. CPRE Hampshire disagrees with this analysis and it would be helpful to understand which case law it is referring to.

While it is sometimes suggested that the words "(in a manner commensurate with their..... identified quality in the development plan)", added to the NPPF in 2018, requires valued landscape to be identified in the development plan, eg by way of a policies map, this is by no means a universal view and has not been

	<p>endorsed by court judgment. While CPRE Hampshire would prefer such mapped identification, we consider it essential only to have a specific policy to protect and enhance valued landscapes, both to be consistent with the NPPF and as a critical part of implementing the key Plan strategy to enhance the natural environment, There is clear precedent for a specific policy to protect and enhance valued landscapes within Hampshire. We note, by way of example, that Policy 5 in the submitted version of the Hampshire Minerals and Waste Plan provides:</p> <p>3. Minerals and waste development which is considered to be within a valued landscape shall only be permitted where they meet the above criteria, and where it protects and where possible, enhances the landscape with particular regard to:</p> <ul style="list-style-type: none"> i. The intrinsic landscape character and quality; ii. The visual setting (including key views); iii. The landscape’s role in natural capital and ecological networks; iv. The local character and setting of built development (including historical significance); and v. Natural landscape features (including ancient woodland, trees, hedgerows, and water courses etc). <p>and the Basingstoke and Dean Local Plan consultation version provides:</p> <p>Landscapes of particularly high value outside of the National Landscape are identified as Valued Landscapes on the Policies Map. Development proposals will only be permitted in these areas where they protect and enhance features that contribute to the character, quality and interpretation of these landscapes</p> <p>And, where Areas of Special Landscape Quality are stated to be valued landscapes, the adopted Fareham Local Plan provides;</p> <p>Areas of Special Landscape Quality have been identified in the Borough and are shown on the Policies map. Development proposals shall only be permitted in these areas where the landscape will be protected and enhanced.</p> <p>Accordingly, CPRE Hampshire submits that the Plan is not consistent with national policy in the form of NPPF paragraph 180(a) and is not an appropriate strategy to implement the key strategy of protecting and enhancing the natural beauty of the plan area, taking into account the reasonable alternative of including a specific policy to protect valued landscapes</p> <p>References CPRE-Hampshire-Position-Statement-Landscape-and-Valued-Landscapes-V2-Aug23.docx (live.com) Defining-Valued-Landscapes-CPRE-Hampshire-Briefing-Document-Sept-2021.pdf (cprehampshire.org.uk)</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>See comments and submission re Policy NE1: Include a Policy compliant with NPPF paragraph 180(a) Further, CPRE Hampshire considers it appropriate for the Council to give a commitment to identify valued landscape within the plan area as part of the next Local Plan Review.</p>

<p>What is your suggested wording or text for the policy?</p>	<p>See comments and submission re Policy NE1: Development which is considered to be within a valued landscape shall only be permitted where it protects and, where possible, enhances the landscape with particular regard to:</p> <ul style="list-style-type: none"> i. The intrinsic landscape character and quality; ii. The visual setting (including key views); iii. The landscape's role in natural capital and ecological networks; iv. The local character and setting of built development (including historical significance); and v. Natural landscape features (including ancient woodland, trees, hedgerows, and water courses etc). <p>Such a policy would not preclude appropriate development within a valued landscape, but would ensure appropriate consideration is given to the need for the proposed development to be within a valued landscape and, if so, its location within that landscape and its design so as to protect the landscape and comply with NPPF paragraph 180(a).</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE9
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/11/NE9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE9
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/8/NE9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We support 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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE9
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/4/NE9
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Bloor Homes supports the principle of permitting new development where it protects and enhances the district's landscape character. In particular, this includes where development proposals have been informed by the existing landscape character.</p> <p>The proposal at Mill Lane, Wickham has been developed through careful analysis of the landscape features and character of the site and its surroundings. The site provides a gateway to both Wickham and the adjacent South Downs National Park, and in the event that the draft allocation were to be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal, the northern part of the site would be retained as open space, with new copse and tree planting to act as a landscape buffer along the northern boundary of the residential development.</p> <p>Existing woodland around the edge of the site and individual trees around the site perimeter are the subject of tree preservation orders. Proposed development at the site will retain these trees, respecting their root protection areas.</p> <p>The requirement to provide a Landscape and Visual Appraisal or a Landscape and Visual Impact Assessment as currently worded applies to all proposed development. This is considered excessive and should only be required for major developments or in sensitive areas.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Bloor Homes supports the principle of permitting new development where it protects and enhances the district's landscape character. In particular, this includes where development proposals have been informed by the existing landscape character.</p> <p>The proposal at Mill Lane, Wickham has been developed through careful analysis of the landscape features and character of the site and its surroundings. The site provides a gateway to both Wickham and the adjacent South Downs National Park, and in the event that the draft allocation were to be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal, the northern part of the site would be retained as open space, with new copse and tree planting to act as a landscape buffer along the northern boundary of the residential development.</p> <p>Existing woodland around the edge of the site and individual trees around the site perimeter are the subject of tree preservation orders. Proposed development at the site will retain these trees, respecting their root protection areas.</p>

	<p>The requirement to provide a Landscape and Visual Appraisal or a Landscape and Visual Impact Assessment as currently worded applies to all proposed development. This is considered excessive and should only be required for major developments or in sensitive areas.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>Bloor Homes supports the principle of permitting new development where it protects and enhances the district's landscape character. In particular, this includes where development proposals have been informed by the existing landscape character.</p> <p>The proposal at Mill Lane, Wickham has been developed through careful analysis of the landscape features and character of the site and its surroundings. The site provides a gateway to both Wickham and the adjacent South Downs National Park, and in the event that the draft allocation were to be expanded to include the land at the junction of Mill Lane, Wickham (WI06), which was part of the original masterplan proposal, the northern part of the site would be retained as open space, with new copse and tree planting to act as a landscape buffer along the northern boundary of the residential development.</p> <p>Existing woodland around the edge of the site and individual trees around the site perimeter are the subject of tree preservation orders. Proposed development at the site will retain these trees, respecting their root protection areas.</p> <p>The requirement to provide a Landscape and Visual Appraisal or a Landscape and Visual Impact Assessment as currently worded applies to all proposed development. This is considered excessive and should only be required for major developments or in sensitive areas.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p>Letter (commenting on policies, policies map and evidence base)</p> <p>Vision document (Land At Mill Lane, Wickham)</p>

Policy/Evidence base document	NE9
Name of respondent (or client)	Bargate Homes
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/2/NE9
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	Bargate Homes consider that criterion vi) should include some flexibility such that where it is necessary to amend green or blue corridors to achieve greater sustainability benefits, then an appropriate scheme of compensation will be required, prioritising other opportunities for these corridors within the site.
What modification(s) are necessary to make the policy legally compliant or sound?	Amend criterion vi) to acknowledge that amendments to existing green and blue corridors may be necessary if compensation is required.
What is your suggested wording or text for the policy?	vi. Green and blue corridors will be safeguarded, unless deemed necessary compensation is provided. Development proposals should identify and take opportunities to create and connect green and blue corridors.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE9
Name of respondent (or client)	David Killeen
Personal reference number	BHLF-AQTS-32EU-R - Hursley Parish Council
Full reference number	BHLF-AQTS-32EU-R - Hursley Parish Council/1/NE9
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Hursley Parish Council broadly supports the draft Local plan but considers Policy NE1 with Policy NE9 is not justified or consistent with national policy. They do not provide for the protection of 'valued landscapes'. The need to protect valued landscapes is recognised in proposed Policy NE1 paragraph 7.22 which states that that "Valued landscapesshould be protected and enhanced", following the wording of NPPF 180(a). However this recognition is not carried forward to the text of the Policy itself. There is clear precedent for a specific policy to protect and enhance valued landscapes within Hampshire. There is significant land within Hursley Parish which is designated as Valued Landscape by CPRE Hampshire.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Form (commenting on policies) Letter (commenting on policies)

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



Policy/Evidence base document	NE9
Name of respondent (or client)	Blenheim Strategic Partners LLP
Personal reference number	BHLF-AQTS-3267-B
Full reference number	BHLF-AQTS-3267-B/2/NE9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE9 Landscape character</p> <p>5.8 This policy is considered to be:</p> <ul style="list-style-type: none"> • Legally compliant • Sound • In compliance with the duty to co-operate <p>5.9 BSP acknowledges the importance of landscape character and distinctiveness when considered in the context of development. The vision for the site on land east of Lovedon Lane embeds a landscape-led approach and the design has been informed by the existing character and context.</p> <p>5.10 The landscape-led strategy for the site achieves the following:</p> <ul style="list-style-type: none"> • Continuation of the undeveloped edge of Kings Worthy to respect the immediate setting of the South Downs National Park and ensure that the settlements of Kings Worthy and Abbots Worthy retain their identities as distinct and separate communities. • Green 'gateway' to Kings Worthy, to complement the existing settlement, with the inclusion of a community orchard which has multiple benefits in terms of Green Infrastructure functionality and health. • Sustainable Urban Drainage, creating a new character to the open space provision on the settlement edge and enhancing Green Infrastructure functionality. • New woodland planting within the north-east of the site to ensure longevity of the dominant characteristics within this part of the site. • Connecting the existing POS to the south with new POS to connect communities both physically and perceptually ensuring community cohesion.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (referring to letter) Letter (commenting on policies)

Policy/Evidence base document	NE9
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/3/NE9
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Winchester College did not make representations at the Regulation 18 consultation stage and is now making comments directly related to changes to the wording of this Policy at the Regulation 19 stage.</p> <p>Winchester College objects to the amendment to Policy NE9, which includes the requirement for ‘A Landscape Visual Appraisal’ (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development must be provided in order to assess potential harm to the character of the area’.</p> <p>The policy does not identify which scale and type of development this is applicable to – clarification is sought. It is not proportionate to require all minor development proposals to provide a Landscape Visual Appraisal’ (LVA) or a Landscape Visual Impact Assessment (LVIA). It would not be appropriate to require proposals for the change of use of an existing building to provide a LVA or LVIA. For clarification, the College requests that the wording of the policy distinguishes between new development and changes of use.</p> <p>The College, therefore, requests that the policy is amended as follows (suggested additional text is underlined):</p> <p>A Landscape Visual Appraisal (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development (other than for change of use) must be provided in order to assess potential harm to the character of the area.’</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>To make the policy sound Policy NE9 should be modified as per the text changes set out. Winchester College did not make representations at the Regulation 18 consultation stage and is now making comments directly related to changes to the wording of this Policy at the Regulation 19 stage.</p> <p>Winchester College objects to the amendment to Policy NE9, which includes the requirement for ‘A Landscape Visual Appraisal’ (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development must be provided in order to assess potential harm to the character of the area’.</p> <p>The policy does not identify which scale and type of development this is applicable to – clarification is sought. It is not proportionate to require all minor development proposals to provide a Landscape Visual Appraisal’ (LVA) or a Landscape Visual Impact Assessment (LVIA). It would not be appropriate to require proposals for the change of use of an existing building to provide a LVA or LVIA. For</p>

	<p>clarification, the College requests that the wording of the policy distinguishes between new development and changes of use.</p> <p>The College, therefore, requests that the policy is amended as follows (suggested additional text is underlined):</p> <p>A Landscape Visual Appraisal (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development (other than for change of use) must be provided in order to assess potential harm to the character of the area.'</p>
<p>What is your suggested wording or text for the policy?</p>	<p>The College requests that the policy is amended as follows (suggested additional text is underlined):</p> <p>A Landscape Visual Appraisal (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development (other than for change of use) must be provided in order to assess potential harm to the character of the area.'</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)</p>

Policy/Evidence base document	NE9
Name of respondent (or client)	Tom Bell
Personal reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council
Full reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council/3/NE9
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	The City Council supports the inclusion of Policy NE9 which focuses on protecting and enhancing the District's distinctive landscape character as defined by the Landscape Character Assessment (LCA) 2022. Portsdown Hill runs along the southernmost edge of Winchester District and forms a distinctive boundary with Portsmouth (as outlined in LCA19 of the LCA). PCC supports the key management strategies as outlined in the LCA, which focuses on protecting, maintaining and restoring farmland, agricultural processes, the rural character and panoramic views all while respecting the setting of Fort Southwick and Fort Nelson. The protection of these heritage assets is vital and therefore PCC further support Policy HE6 of the emerging Local Plan setting out the evidence required as part of an application that has the potential to impact a scheduled monument. We look forward to working with WCC on the protection of Portsdown Hill and its important character and features.
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 supporting information? <i>All relevant information related to the specific policy or</i>	Yes Letter (commenting on policies)

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE10 Protecting Open Areas	
Total Number of Representations received	10	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	3
Sound	4	6
Complies with Duty to Cooperate	7	1
<p>Summary of Representations Criticism for the lack of designation of Local Green Spaces (LGS), as various sites have been suggested by local communities. Respondents express concern that the policy does not meet the requirements of the NPPF, and that a number of spaces have been suggested to be designated as LGS to be included in the local plan and shown on the policies map.</p> <p>Concern in regard to the proposed loss of open areas which are valuable for biodiversity, heritage and recreation.</p> <p>The County Council consider it crucial to recognise the ability for school playing fields to be disposed of for alternative uses as a policy exception - to be able to secure funding for recreational and education improvements - or used to accommodate school expansions.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BDP-2/4/NE10, ANON-AQTS-3BR1-H/5/NE10, ANON-AQTS-3BSY-T/71/NE10, ANON-AQTS-3B52-N/1/NE10, ANON-AQTS-3BBZ-A/1/NE10, ANON-AQTS-32CD-5 - Colden Common Parish Council/41/NE10, ANON-AQTS-32NK-Q/1/NE10, ANON-AQTS-32ZS-B/5/NE10, BHLF-AQTS-328R-8 - Hampshire County Council/21/NE10, BHLF-AQTS-328K-1/14/NE10</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Need to retain open areas that have biodiversity, heritage and recreational importance • Lack of flexibility to allow for the disposal of school playing fields as an exception • Lack of designation of Local Green Spaces as suggested by various local communities. 		

Policy/Evidence base document	NE10
Name of respondent (or client)	E Back
Personal reference number	ANON-AQTS-3BDP-2
Full reference number	ANON-AQTS-3BDP-2/4/NE10
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE10 is not sound as it has not been positively prepared and it is not consistent with national policy. Paragraph 7.78 acknowledges that the NPPF provides for local communities to identify Local Green Space of importance to them. It goes on to state that while consultation on this Local Plan has highlighted the importance of retaining open space, "no Local Green Space designations have been suggested". This is inaccurate, untrue and misleading.</p> <p>The Regulation 18 consultation responses identified many areas of open space that need protection. The responses to policy NE10 specifically included 60 comments asking for Local Green Space (LGS) designation for specific sites/areas of open space or for open space in general. In addition, the responses to policy NE10 included 7 other comments asking for protection of specific sites or areas of open space in general without specifically mentioning the phrase Local Green Space/LGS. Several responses on other sections/policies within the Regulation 18 Local Plan asked for LGS protection for open spaces (general or specific) as well.</p> <p>Such LGS designation is needed due to the fact that several open spaces that were "protected" by relevant policies (e.g. DM5) in the current Local Plan Part 2 have since been developed. Furthermore, other open spaces that are so protected have been put forward for development under other policies in this Regulation 19 Local Plan – e.g. the sports ground on Harestock Road that is protected by current Local Plan policy DM5 is part of the Sir John Moore Barracks development (see policy W2) and has been earmarked for non-sporting use as part of consultations on that site.</p> <p>Such LGS designation is also needed due to the fact that the Local Plan evidence base document "Open Space Assessment 2022" shows an existing deficit of publicly accessible open spaces for sport and recreational use across the Winchester Town wards, relative to population-based open space standards (Winchester Local Plan policy CP7 as cited in the Open Space Assessment 2022). For example, St Paul has a shortfall of 7.48 hectares of sports grounds and 4.54 hectares of parks and recreation grounds, while St Barnabas has a shortfall of 5 hectares of sports grounds and 4.7 hectares of parks and recreation grounds, according to the Open Space Assessment 2022.</p>
What modification(s) are necessary to make the	The local authority should consider each of sites proposed for Local Green Space designation in response to the Regulation 18 consultation, with a presumption that sites will be so designated prior to finalisation of the

<p>policy legally compliant or sound?</p>	<p>Local Plan. Where sites have been put forward by the community through the Local Plan consultation, they should be mapped, with surrounding communities notified of the proposed LGS designation, so that any barriers and issues for consideration prior to such designation can be identified and discussed and if needs be consulted on further.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>The importance of retaining open spaces has been highlighted through the process of consulting local communities on their needs and aspirations, and [number] Local Green Space designations have been suggested. Where the suggested designations relate to sites with amenity, biodiversity, recreational and/or heritage value as set out in the Open Space Assessment 2022, these sites will be mapped and local communities will be notified that Local Green Space designation is proposed for them. Unless a specific barrier to such designation is identified by the local community, each of these sites will be designated as Local Green Space in the Local Plan.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE10
Name of respondent (or client)	Lois Gravely
Personal reference number	ANON-AQTS-3BR1-H
Full reference number	ANON-AQTS-3BR1-H/5/NE10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	I agree that sites of recreational, biodiversity, amenity and heritage value should be protected (Para 7.76). Bushfield Camp qualifies on all of these values and it's protection from development should be immediate.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE10
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/71/NE10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	It is essential to protect open 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?	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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE10
Name of respondent (or client)	KAREN MARGARET BIRD
Personal reference number	ANON-AQTS-3B52-N
Full reference number	ANON-AQTS-3B52-N/1/NE10
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Paragraph 7.78 states, 'The National Planning Policy Framework (NPPF) provides for local communities to identify 'Local Green Space' of particular importance to them. The importance of retaining open spaces has been highlighted through the process of consulting local communities on their needs and aspirations, but no Local Green Space designations have been suggested'.</p> <p>The statement that no Local Green Space designations have been suggested is untrue. In March and April 2021, during the Regulation 18 Consultation, in excess of four hundred people lobbied Winchester City Council to designate the land comprising the settlement gap between Waltham Chase and Shedfield (referred to as land at Five Oaks Farm) as a Local Green Space, on grounds of its beauty, historic significance, recreational value, tranquillity, and richness of wildlife.</p> <p>The draft Local Plan misstates the position and ignores the Shedfield community's suggestion for a designated Local Green Space between Waltham Chase and Shedfield. This will be brought to the attention of the Inspector at the examination.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The statement at paragraph 7.78 should disclose that, during the Regulation 18 Consultation, in excess of four hundred requests were received to designate the land between Waltham Chase and Shedfield (referred to as Land at Five Oaks Farm) as a Local Green Space. The Policies Map and the Open Space Assessment should show the land as designated, or, otherwise, state the impediment and reason why the local community's proposal for a Local Green Space has not been met.
What is your suggested wording or text for the policy?	iv. Where a reasonably substantial number of representations, in compliance with the National Planning Policy Framework, for designation of a Local Green Space are received, they will be given due consideration and, where possible, the land designated as a Local Green Space.
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

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>
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Policy/Evidence base document	NE10
Name of respondent (or client)	Julie Johns
Personal reference number	ANON-AQTS-3BBZ-A
Full reference number	ANON-AQTS-3BBZ-A/1/NE10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>I believe that any development next to Lanham Lane would not meet the 'Protecting Open Areas' policy and I am commenting here as there does not seem to be a clear place to comment on this in the pages and pages of literature that we are expected to understand.</p> <p>If developers are planning to build here the consultation is too short and there is not enough information. I could not answer the questions above as I don't have a legal degree but as they were 'required', I just said 'yes'.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE10
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/41/NE10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We support 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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE10
Name of respondent (or client)	Herbgrove Ltd
Personal reference number	ANON-AQTS-32NK-Q
Full reference number	ANON-AQTS-32NK-Q/1/NE10
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is not considered that Proposed Policy NE10 of the Plan can be considered sound in how it relates and is detailed upon the Proposals Map.</p> <p>(a) Not positively prepared in that unmet need from neighbouring areas is not being accommodated where it is practical to do so and is consistent with achieving sustainable development as is the case with the land detailed in this representation at Grange Road.</p> <p>(b) Not Justified in that the strategy under Policy NE10 is not appropriate when there is an over extensive identification of urban sites as protected open space as at Grange Road on the Proposals Map.</p> <p>(c) Not consistent with national policy in that it is considered the extent and implications of land designated on the Proposals Map under Policy NE10 conflicts with enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.</p> <p>This representation on behalf of Herbgrove Ltd seeks the removal of the protected open space designation (under Proposed Policy NE10 in the Regulation 19 consultation plan) on three small areas of land at the junction of St Cross Road with Grange Road and land on Grange Road.</p> <p>These small areas of land are incidental land remaining from my client's residential development and refurbishment of dwellings at Grange Road around 2004.</p> <p>Paragraph 102 and 103 of the NPPF requires the protection of a network of high quality open spaces which and particularly references protection of open space, sports and recreational buildings and land.</p> <p>There is a clear requirement for, and a benefit in, a Local Plan Policy which protects important areas of open space within the City as sought by the NPPF. There are significant areas of open space and recreation in the city as detailed in the Open Space Assessment (2022). This includes a number of spaces close to Grange Road including St Faiths Meadow, St Cross Meadow and St Cross Cricket Club.</p> <p>Section 4 of the Open Space Assessment concludes that there is a surplus of open space provision in the St Michael's Ward in which the sites subject of this representation are located.</p> <p>Planning policy should relate to important larger open spaces for sport and recreation, large open spaces and recreational spaces and other significant provision including protecting open spaces around the historic buildings in the centre of the city to protect their setting.</p>

	<p>The land subject to this representation is very small and much smaller than other open space area allocations in the ward and wider area.</p> <p>The land detailed on Plan 5996 comprises grass with some tree and shrub planting. The area on the site frontage is adjacent to modern housing development which backs onto St Cross Road with domestic features including close boarded fencing and a bus stop adjacent. It is not actively used and has no features to encourage active use such as seating areas or informal play. Indeed the frontage area of land is very close to the busy St Cross Road.</p> <p>A protected open space designation is onerous both in its purpose and in its application on a key route and highly sustainable location in the city which should be the focus appropriate and high quality new residential development. These sites are effectively windfall sites and any planning application should be subject to an assessment against the relevant planning policies.</p> <p>The key green open space and recreation character in this location is through the extensive area of vegetation to the south of the site fronting St Cross Road and in the open cricket ground and meadows on the opposite side of the road.</p> <p>The other two areas of land further up into Grange Road are effectively landscaping and incidental space typical of any housing area. It is not considered appropriate in the context of national policy (including in the context of the recent consultation on the NPPF and requirement to utilise brownfield land) that such areas are covered with restrictive formal open space designations.</p> <p>These small areas of land do not have an important amenity, biodiversity, heritage or recreational value that could not be maintained and potentially enhanced (such as the response to the frontage conservation area setting onto St Cross Road) through a well-considered development and reconfiguration of the sites. This land should be a focus for assessment as part of meeting demand for sustainable new housing within the city boundary.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Reconsideration and reassessment should be undertaken for the smaller sites included in the NE10 designation protecting open areas, as detailed on the Proposals Map.</p> <p>More specifically my client seeks the removal of land at St Cross Road and Grange Road (as detailed on Plan 5996) from the 'Protected Open Areas' designation on the Winchester Local Plan Proposals map and hence the requirements of Proposed Policy NE10. The land should be identified only as land within the city built up settlement boundary.</p> <p>A separate, but related, representation has been submitted in relation to the Proposals Map.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>The wording of Proposed Policy NE10 should be amended to relate to larger and important open spaces and areas of recreation in the city.</p> <p>The current policy, linked to the Proposals Map, includes sites which are too small to be the subject of protected open space designations and which prevent the potential of highly sustainable sites within the city settlement boundary, which is not in accordance with the NPPF.</p> <p>A separate, but related, representation has been submitted in relation to the Proposals Map.</p>

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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting document (map - Land at Grange Close, Winchester)

Policy/Evidence base document	NE10
Name of respondent (or client)	Andrew Craig
Personal reference number	ANON-AQTS-32ZS-B
Full reference number	ANON-AQTS-32ZS-B/5/NE10
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy NE10 must be reviewed and take into account previously provided feedback and clarification from factual previous consultations. Consequently, in its current format it is not consistent with national policy, nor has it been positively prepared.</p> <p>Paragraph 7.78 acknowledges that the NPPF provides for local communities to identify Local Green Space of importance to them. It goes on to state that while consultation on this Local Plan has highlighted the importance of retaining open space, "no Local Green Space designations have been suggested". This is inaccurate, untrue and misleading.</p> <p>The Regulation 18 consultation responses identified significant areas of open space that need protection. The responses to policy NE10 specifically included 60 comments asking for Local Green Space (LGS) designation for specific sites/areas of open space or for open space in general. Furthermore, the responses to policy NE10 included 7 other comments asking for protection of specific sites or areas of open space in general without specifically mentioning the phrase Local Green Space. Several responses on other sections within the Regulation 18 Local Plan asked for LGS protection for open spaces (general or specific) as well. Such LGS designation is needed because several open spaces that were "protected" by relevant policies (e.g. DM5) in the current Local Plan Part 2 have since been developed. Furthermore, other open spaces that are so protected have been put forward for development under other policies in this Regulation 19 Local Plan – e.g. the sports ground on Harestock Road that is protected by current Local Plan policy DM5 is part of the Sir John Moore Barracks development (see policy W2) and has been earmarked for non-sporting use as part of consultations on that site.</p> <p>Such LGS designation is also needed due to the fact that the Local Plan evidence base document "Open Space Assessment 2022" shows an existing deficit of publicly accessible open spaces for sport and recreational use across the Winchester Town wards, relative to population-based open space standards – currently identified as a shortfall deficit of 18 hectares.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	The local authority should consider each of the sites proposed for Local Green Space designation in response to the Regulation 18 consultation, with a presumption all these sites will be designated prior to finalisation of the Local Plan. Where sites were proposed by the community through the Local Plan

	consultation, they should be mapped using the Local Plan policies map, with surrounding communities notified of the proposed LGS designation.
What is your suggested wording or text for the policy?	The importance of retaining open spaces has been highlighted through the process of consulting local communities on their needs and aspirations, and [number] Local Green Space designations have been suggested. Where the suggested designations relate to sites with amenity, biodiversity, recreational and/or heritage value as set out in the Open Space Assessment 2022, these sites will be mapped and local communities will be notified that Local Green Space designation is proposed for them. Unless a specific barrier to such designation is identified by the local community, each of these sites will be designated as Local Green Space in the Local Plan.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE10
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/21/NE10
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>No – The policy as currently worded is not consistent with national policy. The County Council consider it crucial to recognise the ability for school playing fields to be disposed of for alternative uses - to secure funding for recreational and education improvements - or used to accommodate school expansions, by virtue of Section 77 of the School Standards and Framework Act 1998 and supported by Paragraph 99a of the National Planning Policy Framework (NPPF). Proposals for loss of school playing fields are sent to the Secretary of State for consent and are determined on the overall balance of benefit of the disposal against expected gains, to pupils and existing community users.</p> <p>In order to be consistent with national policy and legislation, the 1998 Act should be referenced in the main policy or supporting text; development of school playing fields under Section 77 would be considered as an exception to the policy.</p>
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?	Yes Letter (commenting on policies and evidence base)

All relevant information related to the specific policy or allocation 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	NE10
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/14/NE10
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Previous Representation made by Winchester College – Regulation 18 consultation Winchester College supports the principle of the protection of open areas however requests that only those sites with amenity, biodiversity, heritage or recreational value are protected. Kingsgate Park (Site 28 in the City Council’s Open Space Assessment) is protected as it has an amenity and recreational value. The site has limited visibility from the public realm and therefore it does not have a significant public amenity value and any recreational value is a private benefit as it is not accessible to the public. This contrasts markedly with the College playing fields (Site 29) which have both an amenity and recreational value. It is therefore requested that the open area designation is removed from Kingsgate Park.</p> <p>WCC Officer Comments in relation to the Regulation 18 consultation Comments Noted. The Kingsgate Park site of the College does still add open space value to the city and forms part of the open space assessment whether or not there is public access. We would therefore not want open space designation removed from this site.</p> <p>There are many private school and college playing fields and sports grounds in Winchester. Even though they are not generally accessible to the wider community they have always been considered worthy of protection in the local plan. They are also mapped in the Open Space Assessment (but not counted as contributing to the quantum of fully accessible recreational areas) and where they are visible from the public realm they are classed as having an amenity value in addition to their recreational value and included in the Open Space Assessment as contributing to the character and appearance of the town. Kingsgate Park is visible from Romans Road and although this is limited to a short stretch of Romans Road it is nevertheless contributing to the amenity of the area and it is therefore included in the OSA for both its recreational value and its amenity value.</p> <p>Recommended Response: no change</p> <p>Representation made by Winchester College – Regulation 19 consultation Winchester College continues to object to this policy. The NPPF (2023) provides the following definition for open space:</p>

	<p>Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity (NPPF 2023, page 73).</p> <p>Recognising the definition provided in the glossary of the NPPF, Kingsgate Park (Site 28 in the City Council's Open Space Assessment) is not an open space of public value. As set out in the Regulation 18 representations, it does not offer sport and recreation to the public, and the site has limited visibility from the public realm therefore, it does not have a significant public amenity value, and any recreational value is a private benefit as it is not accessible to the public.</p> <p>Winchester College supports the principle of the protection of open areas; however, it requests that only those sites with amenity, biodiversity, heritage or recreational value be protected. In order to be consistent with the NPPF, Site 28 should be removed from the Local Plan.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>The open area designation for Kingsgate Park should be removed.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>The open area designation for Kingsgate Park should be removed.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)</p>

WCC Response.

Commented noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to include new supporting paragraph 7.82 as agreed with Hampshire County Council.

Local Plan Reference or document	Policy NE11 Open Space Provision for New Developments	
Total Number of Representations received	8	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	7	1
Sound	4	4
Complies with Duty to Cooperate	8	0
<p>Summary of Representations Respondents raise concerns regarding the effectiveness and compliance of Policy NE11. 62% of responses have suggested that Policy NE11 is integrated into Policy NE3 to ensure shortfalls of open space and sports facilities are addressed. There are concerns that the policy is insufficient in addressing existing deficits, and respondents suggest there is a need for site allocations to contribute to these through on site provision or off site contributions. 50% of the responses provide comments on the policy to improve clarity and effectiveness. There is support for the addition to the policy to reflect the need to provide open space for specialist housing for older people.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/27/NE11 ANON-AQTS-3B44-P - Otterbourne Parish Council/2/NE11 ANON-AQTS-32CD-5 - Colden Common Parish Council/17/NE11 ANON-AQTS-3274-9/2/NE11 ANON-AQTS-32ZS-B/4/NE11 BHLF-AQTS-328X-E/5/NE11 BHLF-AQTS-3286-C/5/NE11 BHLF-AQTS-328G-W/5/NE11</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Comments that NE11 should be integrated and amalgamated as one policy for open space under Policy NE3. • Whether the policy addresses existing open space deficits. • Whether sites allocated in the Plan should provide on site provision or off site contributions. • Support for the inclusion of specialist housing for older people in the policy. 		

Policy/Evidence base document	NE11
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/27/NE11
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE11
Name of respondent (or client)	Parish Clerk
Personal reference number	ANON-AQTS-3B44-P - Otterbourne Parish Council
Full reference number	ANON-AQTS-3B44-P - Otterbourne Parish Council/2/NE11
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Otterbourne Parish Council supports policy NE11 open space provision for new developments.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE11
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/17/NE11
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE11
Name of respondent (or client)	McCarthy Stone & Churchill Living
Personal reference number	ANON-AQTS-3274-9
Full reference number	ANON-AQTS-3274-9/2/NE11
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We welcome the amendment to Policy NE11 to include reference to residential care homes and specialist housing for older people needing to provide 'adequate' amenity space.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (Commenting on policies)

Policy/Evidence base document	NE11
Name of respondent (or client)	Andrew Craig
Personal reference number	ANON-AQTS-32ZS-B
Full reference number	ANON-AQTS-32ZS-B/4/NE11
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The proposed policy NE11 for open space provision for new developments does not currently recognise that there is a requirement to recover the current shortfall of open space and sports grounds within the city of Winchester, as well as ensure the development sites meet the requirements outlined in policy NE3 for their own development criteria.</p> <p>We believe the local plan should include the provision and stated objective that all major developments within the local plan will be expected to meet policy NE3 objectives, and to assist the Winchester city area in recovering the current identified deficit of open space. The proposed Local Plan developments covered within this regulation 19 plan represents the single largest allocation of land and expansion of the city area to date and represents a unique opportunity to strategically identify and earmark land allocation for the creation of strategically needed sports facilities.</p> <p>The Plan objectives and policy should be amended to reflect this, with the requirement for each development to contribute either through land allocation or substitute funding to meet the recovery targets. Development priority should be given to those developments that can demonstrate compliance with this revised objective contained within this policy.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Recognise current existing deficiencies in the provision of sporting grounds and open spaces within the central Winchester city wards, and ensure the Local Plan has clear measurable objective to achieve compliance.
What is your suggested wording or text for the policy?	<p>Amendment to paragraph 2 of the NE11 policy to read as follows:-</p> <p>The exact form and type of open space should take into account the nature and size of the development and the specific needs in the local area, including quantitative and qualitative deficits or surpluses of open space and recreational facilities. It should also recognise and identify the existing shortfalls of open space and sports ground provision within the city and include proposals to eliminate this in line with the size of the development and strategic needs guidance provided by the Council.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE11
Name of respondent (or client)	Wates Developments Ltd
Personal reference number	BHLF-AQTS-328X-E
Full reference number	BHLF-AQTS-328X-E/5/NE11
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Wates understands the principles of proposed Policy NE11 but is unclear of its necessity as a standalone policy.
What modification(s) are necessary to make the policy legally compliant or sound?	Delete the policy and include its wording in Strategic Policy NE3.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (commenting on policies and evidence base)

Policy/Evidence base document	NE11
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-3286-C
Full reference number	BHLF-AQTS-3286-C/5/NE11
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website. Legally compliant Yes Positively prepared Yes Sound No Justified Yes Compliant with the duty to cooperate Yes Effective No Compliant with national policy No 7.9 Wates understands the principles of proposed Policy NE11 but is unclear of its necessity as a standalone policy.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Delete the policy and include its wording in Strategic Policy NE3
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? <i>All relevant information related to the specific policy or</i>	Yes Form (refers to letter) Letter (Commenting on policies)

allocation 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	NE11
Name of respondent (or client)	Wates Developments Ltd. ('Wates')
Personal reference number	BHLF-AQTS-328G-W
Full reference number	BHLF-AQTS-328G-W/5/NE11
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response on website Legally compliant Yes Positively prepared Yes Sound No Justified Yes Compliant with the duty to cooperate Yes Effective No Compliant with national policy No 7.14 Wates understands the principles of proposed Policy NE11 but is unclear of its necessity as a standalone policy.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Delete the policy and include its wording in Strategic Policy NE3.
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? <i>All relevant information related to the specific policy or</i>	<p>Yes Form (refers to letter) Letter (Commenting on policies)</p>

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

WCC Response.

Commented noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE12 Equestrian Development	
Total Number of Representations received	2	
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
Summary of Representations Support for the policy.		
Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/1/NE12 ANON-AQTS-32CD-5 - Colden Common Parish Council/1/NE12		
Main issues raised in representations received in regulation 19 consultation None		

Policy/Evidence base document	NE12
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/1/NE12
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE12
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/1/NE12
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE13 Leisure and Recreation in the Countryside	
Total Number of Representations received	5	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	4	1
Sound	2	3
Complies with Duty to Cooperate	4	0
<p>Summary of Representations Areas for sport and recreation should not be used for development.</p> <p>Whilst the policy allows for the development of new leisure and recreational facilities outside of defined settlement boundaries where a countryside location is necessary, this approach is not echoed in the Strategic Policy SP3. The policy also does not align with the principles of active travel and should refer to the need for facilities to demonstrate active travel access.</p> <p>The plan lacks policies in relation to sport or leisure facilities despite the clear strategic objective of healthy, prosperous communities contrary to NPPF.</p> <p>Request that the policy also refers to enabling development to allow for investment in new or enhanced facilities on the host site. There should also be reference to recreational public access in terms of rivers and watercourses and the benefits this can bring to both health and well being.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/100/NE13 ANON-AQTS-32CD-5 - Colden Common Parish Council/54/NE13 ANON-AQTS-32F2-P/8/NE13 BHLF-AQTS-328Y-F/13/NE13 BHLF-AQTS-3284-A/22/NE13</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Lack of alignment with Policy SP3 Development in the Countryside • Lack of reference to active travel to access sites • Clarify the role of enabling development. 		

Policy/Evidence base document	NE13
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/100/NE13
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Areas for sport and recreation should not be used for 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?	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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE13
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/54/NE13
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE13
Name of respondent (or client)	Three Maid LLP
Personal reference number	ANON-AQTS-32F2-P
Full reference number	ANON-AQTS-32F2-P/8/NE13
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Proposed Policy NE13 sets out a positive policy position for the development of new leisure and recreational facilities outside of defined settlement boundaries where a countryside location is necessary, where it is the expansion of established facilities or where it is for the use of land for leisure and recreational activities. We fully support this policy, which appears to recognise that to meet the sport and leisure needs of the existing and future population of Winchester there is a need for development outside of the existing settlement boundaries. We note, however, that this positively prepared policy is not echoed in the Strategic Policy SP3 and suggest that the following should be added to that policy:</p> <p>“viii. Recreational and Leisure uses and development in line with policy NE13”</p> <p>We are however concerned that the proposed submission local plan provides no other policies in relation to sport or leisure facilities despite the clear strategic objective of healthy, prosperous communities and the Framework’s guidance that policies should enable and support healthy lifestyles.</p>
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?	Yes Letter (commenting on Policies and Evidence Base)

All relevant information related to the specific policy or allocation 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	NE13
Name of respondent (or client)	YMCA Fairthorne Manor Group Philipa Spicer
Personal reference number	BHLF-AQTS-328Y-F
Full reference number	BHLF-AQTS-328Y-F/13/NE13
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>We would also wish to see support embedded within Policy NE13 entitled 'Leisure and Recreation in the Countryside' to acknowledge the importance of enabling forms of development and permits enabling forms of development where they will be used to provide much needed investment in new or enhanced facilities on the host site.</p> <p>5.7 Part of paragraph 7.120 also acknowledges the importance of rivers, it states "opportunities to access and enjoy rivers is important for the health and wellbeing of residents and visitors with the possibility of various recreational activities such as canoeing, fishing, walking or observing their wildlife. All development proposals alongside watercourses should maximise opportunities to enhance recreational public access, whilst ensuring biodiversity is conserved." We support this approach, and we also know that Fairthorne Manor is one of only a handful of locations in the southern part of the District that provide access to a river, and the only location enabling such good access to The Hamble.</p>
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?	<p>Yes</p> <p>Form (Table of policies)</p> <p>Letter (commenting on Policies and Evidence Base - includes vision document))</p>

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

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

Policy/Evidence base document	NE13
Name of respondent (or client)	Andy Key
Personal reference number	BHLF-AQTS-3284-A
Full reference number	BHLF-AQTS-3284-A/22/NE13
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Fails on being effective.</p> <p>To be consistent with the Travel policies, any development of this kind should provide active travel access and should contribute to the wider district active travel network.</p> <p>Developers should be able to demonstrate how potential visitors and staff working at the site can reach the facility by active travel means and/ public transport from nearby settlements.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Require developments to demonstrate active travel access.
What is your suggested wording or text for the policy?	<p>Additional paragraph after para iv:</p> <p>“v. The proposed development includes safe, convenient active travel connections (to LTN 1/20) from nearby settlements, connections to the active travel network as defined by the city and district LCWIPs, and a viable active travel route between the development and the nearest bus and railway stations. The development will be subject to the conditions of this plan’s Transport Policies section in the same way as any other development, regardless of its location.”</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	<p>Yes</p> <p>Form (commenting on policies)</p> <p>Letter (commenting on policies)</p>

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



WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE14 Rural Character	
Total Number of Representations received	8	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	1
Sound	3	4
Complies with Duty to Cooperate	5	2
<p>Summary of Representations Support for the policy.</p> <p>General concern that developments should have no impact on the rural environment, with particular reference to traffic impacts on narrow rural roads and that any assessments need to look beyond the site boundaries and take into consideration cumulative impacts to determine the true traffic impacts. Respondents suggest that the policy therefore contradicts Policy T1 and undermines the transport policies especially where rural roads that are recognised – or identified in the district LCWIP - as being part of rural active travel routes.</p> <p>Clarification is needed to allow for appropriate highways alterations that facilitate sustainable rural development without harming the overall rural character. Respondents suggest that as drafted, the wording can be interpreted such that any alteration to a rural highway is unacceptable, which is clearly unreasonable.</p> <p>Specific request to remove the sites allocated for development in the local plan from the countryside and for settlement boundaries to be amended.</p>		
<p>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/12/NE14 ANON-AQTS-3BSY-T/18/NE14 ANON-AQTS-3BFT-8 - Crawley Parish Council/3/NE14 ANON-AQTS-32CD-5 - Colden Common Parish Council/12/NE14 ANON-AQTS-32G7-V/3/NE14 ANON-AQTS-32SB-K - Defence Infrastructure Organisation/3/NE14 BHLF-AQTS-3284-A/4/NE14</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Contradiction with Policy T1 and the Plans' aim for active travel • Recognition that not all highway alterations may be unacceptable 		

- The need for traffic assessments to look more holistically at the local area and cumulative impacts of recent developments.

Policy/Evidence base document	NE14
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Email correspondence (between officers and Historic England) Email correspondence (between officers and Historic England re: suggested changes)

Policy/Evidence base document	NE14
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/12/NE14
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The aim of the policy is to protect the countryside from unnecessary new development. Where new development is justified it should not harm the rural character of the area outside settlement boundaries. The Parish Council supports the policy. Support Policy NE14
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	NE14
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/18/NE14
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Developments should have no impact on the rural environment.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE14
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/3/NE14
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	The main road (Peach Hill Lane) that runs through Crawley Village is narrow and unable to be altered due to the nature of the settlement. It is incredibly important that additional traffic generated by new developments is assessed and taken into consideration. Previous developments, especially at Three Maids Hill, have already an adverse impact on traffic running through the village. New Development traffic assessments need to cover the local network, not just the immediate area.
What modification(s) are necessary to make the policy legally compliant or sound?	Whilst we largely support the policy. When developments are agreed - commercial or domestic, traffic is only assessed per development. There should be something in the policy that measures the impact of cumulative developments. Eg. At Three Maids Hill there have been three new commercial developments which have cumulatively added a great deal more heavy traffic to local roads. If the cumulative effect of the traffic had been considered, the true impact on the local road network could have been assessed and possibly influenced the outcome of applications. A 'whole' approach would be more useful.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

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

Policy/Evidence base document	NE14
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/12/NE14
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE14
Name of respondent (or client)	Bargate Homes
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/3/NE14
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	Bargate Homes consider that clarification is needed to allow for appropriate highways alterations that facilitate sustainable rural development without harming the overall rural character. As drafted, the wording can be interpreted such that any alteration to a rural highway is unacceptable, which is clearly unreasonable.
What modification(s) are necessary to make the policy legally compliant or sound?	The policy should be amended to clarify that appropriate highways alterations that facilitate sustainable rural development without harming the overall rural character can be acceptable.
What is your suggested wording or text for the policy?	The policy should be amended to clarify that appropriate highways alterations that facilitate sustainable rural development without harming the overall rural character can be acceptable.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE14
Name of respondent (or client)	Defence Infrastructure Organisation
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/3/NE14
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We note the approach within Policy NE14 which seeks to protect the rural character of the countryside within the District. We request that the settlement boundaries should be amended to permit all of the SJMB allocation site and that the SJMB site is excluded from the current 'countryside' designation in the Reg 19 policy map.</p> <p>However, if the SJMB allocation is not to be included within a settlement boundary, we consider that Policy NE14 should be amended to ensure that there is no conflict with Policy W2. In our view, achieving the requirements of Policy NE14 would be challenging whilst delivering a large-scale residential masterplan for the site, in accordance with Policy W2</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>The wording of Policy NE14, first paragraph (P.173) should be amended as follows: Outside defined settlement boundaries, the Council will support development within the Countryside where this accords with Site Allocations within this Plan. For land that is not allocated for development, development proposals outside defined settlement boundaries which accord with the Development Plan will be permitted where they do not have an unacceptable effect on the rural character of the area, by means of visual intrusion, the introduction of incongruous features, the destruction of locally characteristic rural assets, or by impacts on the tranquillity of the environment.</p>
What is your suggested wording or text for the policy?	<p>The wording of Policy NE14, first paragraph (P.173) should be amended as follows: Outside defined settlement boundaries, the Council will support development within the Countryside where this accords with Site Allocations within this Plan. For land that is not allocated for development, development proposals outside defined settlement boundaries which accord with the Development Plan will be permitted where they do not have an unacceptable effect on the rural character of the area, by means of visual intrusion, the introduction of incongruous features, the destruction of locally characteristic rural assets, or by impacts on the tranquillity of the environment.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	NE14
Name of respondent (or client)	Andy Key
Personal reference number	BHLF-AQTS-3284-A
Full reference number	BHLF-AQTS-3284-A/4/NE14
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Fails on being justified and effective.</p> <p>“The impact resulting from the volume and type of traffic generated by the development will be assessed along with the ability of rural roads to accept increased levels of traffic without alterations that would harm their rural character.”</p> <p>This conflicts with policy T1, where developers are expected to demonstrate that their development will not add to existing traffic levels.</p> <p>This is especially important for rural roads that are recognised – or identified in the district LCWIP - as being part of rural active travel routes.</p> <p>As it stands, this policy undermines the Transport policies and contradicts national policy. The policy should be worded to guard against traffic increases on rural roads, especially (as noted above) where these would impact on rural cycle routes connecting settlements.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Delete the non-compliant paragraph and replace it with one that emphasises the need for all developments to meet the requirements of the Transport policies.
What is your suggested wording or text for the policy?	<p>Delete:</p> <p>“The impact resulting from the volume and type of traffic generated by the development will be assessed along with the ability of rural roads to accept increased levels of traffic without alterations that would harm their rural character.”</p> <p>Replace it with:</p> <p>“The development will be expected to comply with the policies in the Transport section of this Plan in the same way as any other development. In particular, it must demonstrate active travel links with the District LCWIP network and must avoid increasing motor traffic on routes currently used for walking, cycling, wheeling or horse riding.”</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies) Letter (commenting on policies)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE15 Special Trees, Important Hedgerows and Ancient Woodlands	
Total Number of Representations received	7	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	6	0
Sound	4	2
Complies with Duty to Cooperate	6	0
<p>Summary of Representations 67% of respondents support the policies focusing on environmental protection and the addition of the 15m buffer. Suggestions for a larger buffer area to protect tree root zones. Concerns arise about inconsistencies with national policies due to references to “exceptional circumstances” within the policy, suggesting a need for clearer definitions and policy criteria. Suggestions that any removal of trees should follow strict guidelines and ensure proper replacement.</p>		
<p>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/19/NE15 ANON-AQTS-32CD-5 - Colden Common Parish Council/14/NE15 ANON-AQTS-329Q-8/9/NE15 ANON-AQTS-32SB-K - Defence Infrastructure Organisation/4/NE15 ANON-AQTS-32ZM-5/2/NE15 BHLF-AQTS-3282-8 - Natural England/5/NE15</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Whether the policy goes beyond the requirements of the NPPF. • Whether a large buffer is required to accommodate root protection zones. • Whether the policy criteria should be strengthened to include guidelines for tree removal and replacement. 		

Policy/Evidence base document	NE15
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Email correspondence (between officers and Historic England) Email correspondence (between officers and Historic England re: suggested changes)

Policy/Evidence base document	NE15
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/19/NE15
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	All woodland should be protected. Trees are an essential part of the environment.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE15
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/14/NE15
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	NE15 - We fully support this policy. In regard to NE15 iii - Colden Common has had development in the past approved built very close to ancient Oak trees. This resulted in the pressure to fell or reduce the trees due to their close proximity to houses and them being blamed for subsidence issues. For this reason we strongly support the policy of a minimum buffer of 15m for any new development when close to ancient woodland or veteran trees.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE15
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/9/NE15
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Criteria i) is considered to go beyond what is set out in the NPPF, with regard to the reference to exceptional circumstances and as such is not consistent with national policy. This should be removed. The draft policy should be amended as follows:</p> <p>The removal of protected trees, groups of trees, woodland or hedgerows will only be permitted in accordance with the relevant legislation, policy and good practice recommendations and where it has been demonstrated to be unavoidable. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.</p> <p>It is noted that a minimum 15m buffer requirement for ancient woodland and veteran trees appropriately reflects national guidance and is therefore supported, but there would be concern if in practice significantly larger buffer areas are requested in the absence of specific justification as this would have significant implications for the efficient use of land and overall housing delivery.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>Criteria i) is considered to go beyond what is set out in the NPPF, with regard to the reference to exceptional circumstances and as such is not consistent with national policy. This should be removed. The draft policy should be amended as follows:</p> <p>The removal of protected trees, groups of trees, woodland or hedgerows will only be permitted in accordance with the relevant legislation, policy and good practice recommendations and where it has been demonstrated to be unavoidable. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.</p> <p>It is noted that a minimum 15m buffer requirement for ancient woodland and veteran trees appropriately reflects national guidance and is therefore supported, but there would be concern if in practice significantly larger buffer areas are requested in the absence of specific justification as this would have significant implications for the efficient use of land and overall housing delivery.</p>
What is your suggested wording or text for the policy?	<p>Criteria i) is considered to go beyond what is set out in the NPPF, with regard to the reference to exceptional circumstances and as such is not consistent with national policy. This should be removed. The draft policy should be amended as follows:</p> <p>The removal of protected trees, groups of trees, woodland or hedgerows will only be permitted in accordance with the relevant legislation, policy and good practice recommendations and where it has been demonstrated</p>

	<p>to be unavoidable. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.</p> <p>It is noted that a minimum 15m buffer requirement for ancient woodland and veteran trees appropriately reflects national guidance and is therefore supported, but there would be concern if in practice significantly larger buffer areas are requested in the absence of specific justification as this would have significant implications for the efficient use of land and overall housing delivery.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)</p>

Policy/Evidence base document	NE15
Name of respondent (or client)	Defence Infrastructure Organisation
Personal reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation
Full reference number	ANON-AQTS-32SB-K - Defence Infrastructure Organisation/4/NE15
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	We support the approach within Policy NE15 to protect special natural features and their setting, to retain visual amenity, biodiversity and heritage value. However, for clarity we consider that additional definitions should be provided (either within the supporting text to this Policy, or within the Local Plan glossary) to ensure that the policy is effective.
What modification(s) are necessary to make the policy legally compliant or sound?	<p>We consider the following definitions should be amended/added to Policy NE 15:</p> <ul style="list-style-type: none"> • Paragraph 7.107 should make a distinction between ‘Ancient Woodland’ (which should also be capitalised in the policy text) and trees of significance. Ancient Woodland is defined within the NPPF as follows and this Paragraph should include this definition i.e.: “An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)”. • Paragraph 7.107 should include a specific definition of ‘special trees’ which, in our view, should be defined as ‘Trees protected by a Tree Preservation Order”. • Paragraph 7.108 should include a specific definition of ‘important hedgerows’ which should refer to the Hedgerow Regulations definition. • A specific definition should also be included for “distinctive ground flora” which, in our view, should be defined as “typical woodland ground flora assemblage that is associated with the Ancient Woodland and Important Hedgerows”.
What is your suggested wording or text for the policy?	<p>We consider the following definitions should be amended/added to Policy NE 15:</p> <ul style="list-style-type: none"> • Paragraph 7.107 should make a distinction between ‘Ancient Woodland’ (which should also be capitalised in the policy text) and trees of significance. Ancient Woodland is defined within the NPPF as follows and this Paragraph should include this definition i.e.: “An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)”. • Paragraph 7.107 should include a specific definition of ‘special trees’ which, in our view, should be defined as ‘Trees protected by a Tree Preservation Order”. • Paragraph 7.108 should include a specific definition of ‘important hedgerows’ which should refer to the Hedgerow Regulations definition.

	<ul style="list-style-type: none"> A specific definition should also be included for “distinctive ground flora” which, in our view, should be defined as “typical woodland ground flora assemblage that is associated with the Ancient Woodland and Important Hedgerows”.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	NE15
Name of respondent (or client)	Jonathan Marmont
Personal reference number	ANON-AQTS-32ZM-5
Full reference number	ANON-AQTS-32ZM-5/2/NE15
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	I strongly support this policy and it being well applied to protect our natural environment.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE15
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/5/NE15
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Natural England welcomes point iii which require adequate buffer zones to woodland and a minimum buffer of 15 to ancient woodland. The supporting text should reference to Natural England and the Forestry Commission's standing advice on Ancient Woodland and Veteran trees. This sets out that the buffer to ancient woodland should be a minimum of 15m, however this is a minimum starting point, we recommend the policy is strengthened to require assessment of tree root protection zones and that a larger buffer may be required. The Woodland Trust has provided further advice on impacts from development in the vicinity of ancient woodland and recommended buffer zones, we recommend this is referred to in the policy supporting text.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	Yes Letter (Commenting on policies and evidence base) Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites) Form (commenting on Air Quality only)

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



WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent and The River Itchen	
Total Number of Representations received	8	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	7	1
Sound	4	3
Complies with Duty to Cooperate	7	0
<p>Summary of Representations Support from organisations such as Natural England for the delivery of nature-based solutions. Support from authorities such as Portsmouth City Council in relation to delivering a sustainable supply of nutrient mitigation. 88% of respondents are concerned over the uncertainty of the Habitats Regulations in light of current case law (CJ Fry). Respondents suggest that ‘overnight developments’ are specifically referenced in the policy to ensure clarity.</p> <p>Organisations such as Natural England support the policy but have suggested amendments for clarity. There is concern over the reliance on strategic mitigation solutions where there is a need from other local authorities within the same catchment. Some concerns over the sewage issues and flooding in Colden Common. Suggestions that the policy wording should include reference to the relevant legislation available at the time such as the LURA. Current lack of clarity on how the Council can assist developers with nutrient mitigation solutions. Comments from respondents on ensuring the LPA continues to encourage developers to agree nutrient solutions with Natural England.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/74/NE16 ANON-AQTS-3BPH-6/7/NE16 ANON-AQTS-32CD-5 - Colden Common Parish Council/42/NE16 ANON-AQTS-329Q-8/34/NE16 ANON-AQTS-3BQA-Z/19/NE16 BHLF-AQTS-326X-C - New Forest District Council/2/NE16 BHLF-AQTS-3282-8 - Natural England/13/NE16 BHLF-AQTS-328K-1/16/NE16 BHLF-AQTS-32Q2-1 – Portsmouth City Council/4/NE16</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Whether the policy should reference ‘overnight development’ to ensure correct application. • Whether the policy should reference to the relevant case law and legislation available at the time. • Lack of clarity in relation to strategic nutrient mitigation solutions available to developers. 		

- Concern over the treatment of sewerage issues at Colden Common.

Policy/Evidence base document	NE16
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/74/NE16
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE16
Name of respondent (or client)	ReAssure Limited c/o Legal & General Real Assets
Personal reference number	ANON-AQTS-3BPH-6
Full reference number	ANON-AQTS-3BPH-6/7/NE16
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>The issues arising from nutrient neutrality are essentially a matter arising from new residential development including that which results in overnight accommodation, as set out at paragraph 7.111 of the Local Plan. However the policy wording under NE16(ii) seeks to apply this to all development and is therefore inconsistent.</p> <p>We note that the Council's Consultation Comments state that references to 'residential' should change to 'overnight' development (as set out in the new supporting paragraphs 7.111 and 7.113). Our client supports this change. However, our client still objects on the basis that the Policy wording itself still applies to all development proposals, rather than those containing overnight accommodation.</p> <p>It is therefore recommended that the Policy NE16 be amended to explicitly refer to overnight development for the avoidance of any doubt as to what applications / uses will be subject to the policy.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>The issues arising from nutrient neutrality are essentially a matter arising from new residential development including that which results in overnight accommodation, as set out at paragraph 7.111 of the Local Plan. However the policy wording under NE16(ii) seeks to apply this to all development and is therefore inconsistent.</p> <p>We note that the Council's Consultation Comments state that references to 'residential' should change to 'overnight' development (as set out in the new supporting paragraphs 7.111 and 7.113). Our client supports this change. However, our client still objects on the basis that the Policy wording itself still applies to all development proposals, rather than those containing overnight accommodation.</p> <p>It is therefore recommended that the Policy NE16 be amended to explicitly refer to overnight development for the avoidance of any doubt as to what applications / uses will be subject to the policy.</p>
What is your suggested wording or text for the policy?	<p>The issues arising from nutrient neutrality are essentially a matter arising from new residential development including that which results in overnight accommodation, as set out at paragraph 7.111 of the Local Plan. However the policy wording under NE16(ii) seeks to apply this to all development and is therefore inconsistent.</p> <p>We note that the Council's Consultation Comments state that references to 'residential' should change to 'overnight' development (as set out in the new supporting paragraphs 7.111 and 7.113). Our client supports</p>

	<p>this change. However, our client still objects on the basis that the Policy wording itself still applies to all development proposals, rather than those containing overnight accommodation.</p> <p>It is therefore recommended that the Policy NE16 be amended to explicitly refer to overnight development for the avoidance of any doubt as to what applications / uses will be subject to the policy.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (Commenting on policies)</p>

Policy/Evidence base document	NE16
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/42/NE16
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Sewage flooding at Brambridge is incompatible with soundness of policy NE16 under the site allocations in SP2.</p> <p>Although WCC and Southern Water have a statement of common ground this statement is already out of date as investigations into the capacity of the rising mains shows no blockages.</p> <p>No resolutions have been defined to enable this policy to be met with site allocations for Colden Common under policy SP2</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Examination of the solution to sewage flooding at Brambridge to ensure effluent will be stopped from entering the Itchen.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE16
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/34/NE16
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is noted from paragraph 7.113 that the council has received guidance from Natural England in 2022, affecting the way the council has to assess new overnight development across the whole district in terms of calculating the impact caused by the wastewater they produce. The policy has now also been revised from the regulation 18 policy to include 'nutrient budgets' and 'nutrient credits' as a means to offset developer impacts.</p> <p>It is worth noting that the Government has sought to address nutrient neutrality through the Levelling Up and Regeneration Act (LURA), to require wastewater treatment works to be upgraded to the highest technically achievable limits. Policy wording and supporting text should include reference to the LURAI, which will supersede the requirement for individual schemes to demonstrate nutrient neutrality from 2030.</p> <p>Additionally, it should be recognised that there is significant uncertainty surrounding the methods available to achieve nutrient neutrality. While there are numerous strategic solutions, the policy fails to mention that the Local Planning Authority can play a vital role in facilitating these solutions, to support their growth strategy. The regulation 19 policy introduces a specific requirement about making positive contributions to the Local Nature Recovery Network within criterion iii, which was not previously included with the regulation 18 policy. However, there is nothing within the supporting text to explain what is required. Further explanation is needed to guide development in the district.</p> <p>Many of the larger brownfield sites which the Council is seeking to prioritise delivery of are affected by nutrient neutrality issues, including both nitrates and phosphates. Such sites are less likely to be able to easily achieve nutrient neutrality, particularly in light of the 2030 date for upgrading of wastewater treatment plants. Consideration should be therefore given to a more balanced approach to the location of development which allows greenfield sites which are less constrained by nutrient neutrality issues to come forward prior to 2030. One such site is the draft allocation at Land at Mill Lane, Wickham (Policy WK5). Additionally, we propose expanding this draft allocation to include site WI06, located at the junction of Mill Lane, Wickham. This site was included in a previously suggested masterplan and is not subject to nutrient neutrality issues. Incorporating it could significantly increase the total number of units from 40 to approximately 100.</p>
What modification(s) are necessary to make the	It is noted from paragraph 7.113 that the council has received guidance from Natural England in 2022, affecting the way the council has to assess new overnight development across the whole district in terms of

<p>policy legally compliant or sound?</p>	<p>calculating the impact caused by the wastewater they produce. The policy has now also been revised from the regulation 18 policy to include ‘nutrient budgets’ and ‘nutrient credits’ as a means to offset developer impacts.</p> <p>It is worth noting that the Government has sought to address nutrient neutrality through the Levelling Up and Regeneration Act (LURA), to require wastewater treatment works to be upgraded to the highest technically achievable limits. Policy wording and supporting text should include reference to the LURAI, which will supersede the requirement for individual schemes to demonstrate nutrient neutrality from 2030.</p> <p>Additionally, it should be recognised that there is significant uncertainty surrounding the methods available to achieve nutrient neutrality. While there are numerous strategic solutions, the policy fails to mention that the Local Planning Authority can play a vital role in facilitating these solutions, to support their growth strategy. The regulation 19 policy introduces a specific requirement about making positive contributions to the Local Nature Recovery Network within criterion iii, which was not previously included with the regulation 18 policy. However, there is nothing within the supporting text to explain what is required. Further explanation is needed to guide development in the district.</p> <p>Many of the larger brownfield sites which the Council is seeking to prioritise delivery of are affected by nutrient neutrality issues, including both nitrates and phosphates. Such sites are less likely to be able to easily achieve nutrient neutrality, particularly in light of the 2030 date for upgrading of wastewater treatment plants. Consideration should be therefore given to a more balanced approach to the location of development which allows greenfield sites which are less constrained by nutrient neutrality issues to come forward prior to 2030. One such site is the draft allocation at Land at Mill Lane, Wickham (Policy WK5). Additionally, we propose expanding this draft allocation to include site WI06, located at the junction of Mill Lane, Wickham. This site was included in a previously suggested masterplan and is not subject to nutrient neutrality issues. Incorporating it could significantly increase the total number of units from 40 to approximately 100.</p>
<p>What is your suggested wording or text for the policy?</p>	<p>It is noted from paragraph 7.113 that the council has received guidance from Natural England in 2022, affecting the way the council has to assess new overnight development across the whole district in terms of calculating the impact caused by the wastewater they produce. The policy has now also been revised from the regulation 18 policy to include ‘nutrient budgets’ and ‘nutrient credits’ as a means to offset developer impacts.</p> <p>It is worth noting that the Government has sought to address nutrient neutrality through the Levelling Up and Regeneration Act (LURA), to require wastewater treatment works to be upgraded to the highest technically achievable limits. Policy wording and supporting text should include reference to the LURAI, which will supersede the requirement for individual schemes to demonstrate nutrient neutrality from 2030.</p> <p>Additionally, it should be recognised that there is significant uncertainty surrounding the methods available to achieve nutrient neutrality. While there are numerous strategic solutions, the policy fails to mention that the Local Planning Authority can play a vital role in facilitating these solutions, to support their growth strategy. The regulation 19 policy introduces a specific requirement about making positive contributions to the Local Nature Recovery Network within criterion iii, which was not previously included with the regulation 18 policy.</p>

	<p>However, there is nothing within the supporting text to explain what is required. Further explanation is needed to guide development in the district.</p> <p>Many of the larger brownfield sites which the Council is seeking to prioritise delivery of are affected by nutrient neutrality issues, including both nitrates and phosphates. Such sites are less likely to be able to easily achieve nutrient neutrality, particularly in light of the 2030 date for upgrading of wastewater treatment plants. Consideration should be therefore given to a more balanced approach to the location of development which allows greenfield sites which are less constrained by nutrient neutrality issues to come forward prior to 2030. One such site is the draft allocation at Land at Mill Lane, Wickham (Policy WK5). Additionally, we propose expanding this draft allocation to include site WI06, located at the junction of Mill Lane, Wickham. This site was included in a previously suggested masterplan and is not subject to nutrient neutrality issues. Incorporating it could significantly increase the total number of units from 40 to approximately 100.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)</p>

Policy/Evidence base document	NE16
Name of respondent (or client)	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
Personal reference number	ANON-AQTS-3BQA-Z
Full reference number	ANON-AQTS-3BQA-Z/19/NE16
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor is generally supportive of R19 LP Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SAC) and Ramsar Sites of the Solent and the River Itchen, however note that the wording needs to be tightened with sufficient clarity currently presented on the means available to deliver nutrient neutrality, as currently it leaves too much uncertainty about how to address nutrient neutrality as part of the planning process. There is much supporting information related to the availability of nutrient credits and the importance of strategic solutions, yet the policy is lacking in the ability of the Local Planning Authority (LPA) to assist with the solutions.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor is generally supportive of R19 LP Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SAC) and Ramsar Sites of the Solent and the River Itchen, however note that the wording needs to be tightened with sufficient clarity currently presented on the means available to deliver nutrient neutrality, as currently it leaves too much uncertainty about how to address nutrient neutrality as part of the planning process. There is much supporting information related to the availability of nutrient credits and the importance of strategic solutions, yet the policy is lacking in the ability of the Local Planning Authority (LPA) to assist with the solutions.</p>
What is your suggested wording or text for the policy?	<p>PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>Bloor is generally supportive of R19 LP Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SAC) and Ramsar Sites of the Solent and the River Itchen, however note that the wording needs to be tightened with sufficient clarity currently presented on the means available to deliver nutrient neutrality, as currently it leaves too much uncertainty about how to address nutrient neutrality as part of the planning process. There is much supporting information related to the availability of nutrient credits and the importance of strategic solutions, yet the policy is lacking in the ability of the Local Planning Authority (LPA) to assist with the solutions.</p>

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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on Policies & Evidence Base) Supporting document 1 (South Winchester Vision Document) Supporting document 2 (Response to the delivery of housing) Supporting document 3 (Technical Note 1 - Sustainability & Transport) Supporting document 4 (Technical Note 2 - Transport Feasibility Report) Supporting document 5 (Statement of Common Ground between Bloor Homes & Stagecoach (South) Ltd)

Policy/Evidence base document	NE16
Name of respondent (or client)	New Forest District Council
Personal reference number	BHLF-AQTS-326X-C - New Forest District Council
Full reference number	BHLF-AQTS-326X-C - New Forest District Council/2/NE16
Legally compliant?	Yes
Sound?	
Complies with duty to co-operate?	Yes
Policy/Document comment	Full response on website. Nutrient Neutrality (draft Policy NE16) NFDC supports the inclusion of proposed Policy NE16 which sets out to ensure that development proposals demonstrate that they secure nutrient neutrality to avoid having an adverse impact on the integrity of internationally important habitats.
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Form (Copy of form - refers to letter) Letter (Commenting on policies)

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

Policy/Evidence base document	NE16
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/13/NE16
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>There are impacts on nationally and internationally designated sites in the Itchen and Solent catchments arising from excessive nutrients entering the water environment. It is Natural England's view that there is a likely significant effect on internationally designated sites in the River Itchen and Solent catchments due to an increase in wastewater from new housing.</p> <p>Policy NE16 ensures that any new development posing a likely significant effect to designated sites through wastewater will not cause an adverse effect to the integrity of the Habitats sites.</p> <p>The Plan HRA is supported by a Nutrient Topic Paper setting out the plan level budget and expected mitigation requirements across the plan period. Paragraph 5.66 relies upon policy NE16 requiring allocations and windfall development to assess nutrient impacts and provide mitigation at project level. This is conclusion is not correct and would not meet the tests of the Habitats Regulations. Natural England has advised the Council that the plan must produce a nutrient budget and expected mitigation across the plan period, this work has been set out in the supporting Nutrient Topic paper.</p> <p>Natural England have worked with the Council on agreeing the nutrient topic paper, we will continue to engage on strategic nutrient mitigation schemes as they come forward.</p> <p>The HRA should be updated to reflect this in the appropriate assessment conclusions.</p> <p>We welcome this policy supporting mitigation schemes such as tree planting or wetlands in appropriate locations. The policy should also set out that mitigation schemes coming forward should be agreed with Natural England. For wetlands in particular, they must be designed and assessed in line with the Natural England Wetland Framework if they are to be suitable for nutrient credits. Wetlands coming forward in floodplains without well characterised and controllable inflows are unlikely to be suitable as constructed wetlands to generate nutrient credits. In such circumstances a more naturalised wetland may be an appropriate alternative which would seek to generate biodiversity net gain or carbon credits but not nutrient credits. Any development coming forward in mains sewage areas which seek to install an onsite wastewater treatment works will need to seek agreement of the Environment Agency and those draining to the River Itchen will need to assess impacts to flows and loads condition targets of the River Itchen SAC both from surface water and groundwater. This is particular is relevant to policy W5 Bushfield Camp.</p> <p>The policy supporting text also states that the Local Plan may be able to help by allocating land for</p>

	<p>mitigation schemes using nature based solutions. The plan and nutrient topic paper do not set out any allocations for this purpose, we would encourage the Council to continue to engage with developers and landowners in their plan area to bring forward such schemes.</p> <p>We would also advise that paragraph 7.112 makes reference to impacts on the River Itchen SAC from nitrogen and phosphorus.</p>
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	<p>Yes</p> <p>Letter (Commenting on policies and evidence base)</p> <p>Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</p> <p>Form (commenting on Air Quality only)</p>

Policy/Evidence base document	NE16
Name of respondent (or client)	Winchester College
Personal reference number	BHLF-AQTS-328K-1
Full reference number	BHLF-AQTS-328K-1/16/NE16
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>Previous Representation made by Winchester College – Regulation 18 consultation Winchester College requests that this policy should acknowledge that the Habitats Regulations will cease to have effect at the end of 2023 and decisions on nutrient neutrality will be made based on the legislation and latest guidance in force at that time.</p> <p>WCC Officer Comments in relation to the Regulation 18 consultation Comments Noted. It is unclear whether this element will now be retained as part of the retained EU Law. Therefore, any changes will be monitored and incorporated into the policy if and when these changes take place. Recommended Response: No Change</p> <p>Representation made by Winchester College – Regulation 19 consultation The WCC Officer response acknowledges that the situation is unclear and there is a requirement to monitor and incorporate any changes into policy. It would take a period of time for the local plan policy to be updated to reflect any change in EU Law.</p> <p>For Policy NE16 to be sound, Winchester College suggest that text is added to acknowledge that decisions on nutrient neutrality will be made based on the legislation and latest guidance in force at that time.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	For Policy NE16 to be sound, Winchester College suggest that text is added to acknowledge that decisions on nutrient neutrality will be made based on the legislation and latest guidance in force at that time.
What is your suggested wording or text for the policy?	For Policy NE16 to be sound, Winchester College suggest that text is added to acknowledge that decisions on nutrient neutrality will be made based on the legislation and latest guidance in force at that time.
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

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (commenting on policies) Supporting information (Map - Blackbridge Yard)</p>
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Policy/Evidence base document	NE16
Name of respondent (or client)	Tom Bell
Personal reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council
Full reference number	BHLF-AQTS-32Q2-1 - Portsmouth City Council/4/NE16
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>The City Council supports the inclusion of Policy NE 16 addressing Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent.</p> <p>The City Council will continue to work with WCC and other partners through the PfSH Strategic Environmental Planning Team to deliver a sustainable supply of mitigation and offsetting to address Nutrient Neutrality.</p>
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 supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modification](#) to paragraphs 7.112, 7.115 to be agreed with Natural England.

Local Plan Reference or document	Policy NE17 Rivers, Watercourses and their Settings	
Total Number of Representations received	4	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	1
Sound	3	1
Complies with Duty to Cooperate	3	1
<p>Summary of Representations Some support for the policy in relation to recognising the important of rivers, watercourses and chalk streams. Suggesting that the policy should recognise natural buffer zones between developments and rivers/watercourses. Some concerns over the sewage issues and flooding in Colden Common. Concern that the policy does not adequately reflect the requirements of the Solent Wader and Brent Geese Strategy (SWBGS).</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/15/NE17 ANON-AQTS-32CD-5 - Colden Common Parish Council/9/NE17 ANON-AQTS-32UK-X - Environment Agency/5/NE17 BHLF-AQTS-3282-8 - Natural England/4/NE17</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Whether buffer zones should be reflected within the policy. • Whether the policy adequately reflects the SWBGS. 		

Policy/Evidence base document	NE17
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/15/NE17
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
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 hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	NE17
Name of respondent (or client)	Debbie Harding
Personal reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council
Full reference number	ANON-AQTS-32CD-5 - Colden Common Parish Council/9/NE17
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Please see comments on NE16: Sewage flooding at Brambridge is incompatible with soundness of policy NE16 under the site allocations in SP2.</p> <p>Although WCC and Southern Water have a statement of common ground this statement is already out of date as investigations into the capacity of the rising mains shows no blockages.</p> <p>No resolutions have been defined to enable this policy to be met with site allocations for Colden Common under policy SP2</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Examination of the solution to sewage flooding at Brambridge to ensure effluent will be stopped from entering the Itchen.
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? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

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

Policy/Evidence base document	NE17
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/5/NE17
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>We are supportive of this policy which rightly acknowledges the importance of rivers and watercourses, particularly chalk streams. However, we would suggest a minor addition as a new point within the list as shown below:</p> <p>“Adequate natural buffers zones should be provided between riverbanks/watercourse banks and any built development.”</p> <p>Buffer zones between built development and river/watercourse banks (at a minimum of 10 metres) provide multiple benefits for water quality, pollution prevention, flood risk management, habitat connection and biodiversity. These should be strongly encouraged within Local Plan policy.</p> <p>These buffer zones should be kept free of any structures to allow the natural watercourse environment to flourish.</p> <p>We note that the monitoring for this policy refers to Natural England objections only (page 519). However, it is possible that Environment Agency objections could also be forthcoming on water quality grounds.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	<p>We are supportive of this policy which rightly acknowledges the importance of rivers and watercourses, particularly chalk streams. However, we would suggest a minor addition as a new point within the list as shown below:</p> <p>“Adequate natural buffers zones should be provided between riverbanks/watercourse banks and any built development.”</p> <p>Buffer zones between built development and river/watercourse banks (at a minimum of 10 metres) provide multiple benefits for water quality, pollution prevention, flood risk management, habitat connection and biodiversity. These should be strongly encouraged within Local Plan policy.</p> <p>These buffer zones should be kept free of any structures to allow the natural watercourse environment to flourish.</p> <p>We note that the monitoring for this policy refers to Natural England objections only (page 519). However, it is possible that Environment Agency objections could also be forthcoming on water quality grounds.</p>
What is your suggested wording or text for the policy?	<p>We are supportive of this policy which rightly acknowledges the importance of rivers and watercourses, particularly chalk streams. However, we would suggest a minor addition as a new point within the list as shown below:</p>

	<p>“Adequate natural buffers zones should be provided between riverbanks/watercourse banks and any built development.”</p> <p>Buffer zones between built development and river/watercourse banks (at a minimum of 10 metres) provide multiple benefits for water quality, pollution prevention, flood risk management, habitat connection and biodiversity. These should be strongly encouraged within Local Plan policy.</p> <p>These buffer zones should be kept free of any structures to allow the natural watercourse environment to flourish.</p> <p>We note that the monitoring for this policy refers to Natural England objections only (page 519). However, it is possible that Environment Agency objections could also be forthcoming on water quality grounds.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>No, I don't want to take part in a hearing session</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	NE17
Name of respondent (or client)	Ellen Satchwell
Personal reference number	BHLF-AQTS-3282-8 - Natural England
Full reference number	BHLF-AQTS-3282-8 - Natural England/4/NE17
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy wording also states that the loss of habitats identified as in the Solent Wader and Brent Goose Strategy do not require HRA. This is incorrect, the SWBGS has mapped a network of terrestrial sites located outside of the Solent SPAs boundaries which used by SPA species (including qualifying features and assemblage species) as alternative areas for roosting and foraging. These sites support the functionality of the designated sites and are therefore protected in this context, they should be referred to as functionally linked land. Any development coming forward which will impact these sites directly or indirectly will require a HRA and should provide mitigation in line with the SWBGS mitigation guidance, this includes Low Use sites. It is also a requirement of the SWBGS that should site classification be disputed, reclassification of a site will only be considered if confirmed by three consecutive years of winter surveys to the agreed methodology, under appropriate habitat management conditions for waders and/or brent geese usage throughout the survey period. We recommend this policy is also linked to policy CN4.
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?	Yes Letter (Commenting on policies and evidence base) Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)

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

[Form \(commenting on Air Quality only\)](#)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed modifications](#) to Policy NE17 and paragraph 7.118 to be agreed with Natural England.

[Proposed modification](#) to include new policy criterion vii. and new paragraph in the supporting text agreed with the Environment Agency.