

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

### Historic 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 HE1<br>Historic Environment |           |
|---|------------------------------------|-----------|
| <b>Total Number of Representations received</b>   | 6                                  |           |
| <b>Number of respondents who confirmed they consider the policy is –</b>  | <b>Yes</b>                         | <b>No</b> |
| <b>Legally Compliant</b>  | 4                                  | 0         |
| <b>Sound</b>  | 3                                  | 1         |
| <b>Complies with Duty to Cooperate</b>  | 4                                  | 0         |
| <p><b>Summary of Representations</b><br/> A number of representations support this policy.</p> <p>Other representations refer to the need to retain and preserve distinct heritage qualities, such as boundaries and features against development pressures, to ensure each settlement/parish retains its own unique qualities</p> <p>The policy needs to allow for the upgrading of heritage buildings with modern technology to also achieve desired energy efficiency/net carbon zero aspirations to allow them a meaningful future and whilst retaining historic context, such adaptations should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>Overall, the responses reflect the need for flexible heritage policies that align historical preservation with contemporary and future needs.</p> |                                    |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)<br/> <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br/> <b>ANON-AQTS-3BTZ-V - Bishop’s Sutton Parish Council/2/HE1</b><br/> <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/53/HE1</b><br/> ANON-AQTS-3BSY-T/67/HE1<br/> <b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/17/HE1</b><br/> <b>ANON-BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/17/HE1</b></p>  |                                    |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Need for practical policies that allow meaningful, sustainable use of historic buildings without imposing economic strains; and</li> <li>• Flexibility for sustainable, climate-conscious upgrades, and installation of modern, high-tech infrastructure.</li> </ul>  |                                    |           |

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| <b>Policy/Evidence base document</b>  | HE1  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  | I suggest referring to Registered Parks and Gardens to distinguish from those historic parks that are locally listed   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   | "Currently there are 110 Scheduled Monuments, 2,271 listed buildings, 11 historic Registered parks and gardens, 37 Conservation Areas and a historic battlefield at Cheriton, which fall within the Winchester district."                    |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

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| <b>Policy/Evidence base document</b>   | HE1   |
| <b>Name of respondent (or client)</b>  | Councillor Nicola Macintyre   |
| <b>Personal reference number</b>   | ANON-AQTS-3BTZ-V - Bishop's Sutton Parish Council   |
| <b>Full reference number</b>   | ANON-AQTS-3BTZ-V - Bishop's Sutton Parish Council/2/HE1   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | Yes   |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>Whilst we agree that this wording is compliant, the village of Bishop's Sutton, which shares a boundary with New Alresford, would like to ensure that developers recognise the unique qualities of our village, which is distinct from and separate from New Alresford, and other surrounding villages.</p> <p>With reference to HE1 - Historic Environment - Strategic Environment, 8.3, "...The exceptional quality of the landscape, heritage, and built environment are some of the core reasons why people want to live, work in and visit the district...",</p> <p>and Key Issues iii : "...The location of new development must be carefully considered in order to ensure that the character and significance of heritage assets and their settings are not adversely affected...",</p> <p>we would like to ensure that the boundary between the town of New Alresford, and the village of Bishop's Sutton are not encroached by or blurred by development, thereby adversely affecting the unique characters of their historic, environmental and social differences.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |   |
| <b>What is your suggested wording or text for the policy?</b>                            |   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | No, I don't want to take part in a hearing session  |

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| <p><b>Have you submitted supporting information?</b><br/><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p> | <p>No</p> |
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|---|---|
| <b>Policy/Evidence base document</b>  | HE1   |
| <b>Name of respondent (or client)</b>   | Lisa Fielding   |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council   |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/53/HE1  |
| <b>Legally compliant?</b>   | Yes   |
| <b>Sound?</b>   | Yes   |
| <b>Complies with duty to co-operate?</b>  | Yes   |
| <b>Policy/Document comment</b>  | The heritage of an area, including in our Parish at Flowerdown, is an important part of its character. The proposed heritage policies of the local plan provide a robust framework and are supported by the Parish Council.<br>Support Strategic Policy HE1 |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |   |
| <b>What is your suggested wording or text for the policy?</b>   |   |
| <b>Do you agree with how the policy will be monitored?</b>  |   |
| <b>If no, please explain</b>  |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>  |

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|---|--|
| <b>Policy/Evidence base document</b>  | HE1  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/67/HE1                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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   |

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|--|---|
| <b>Policy/Evidence base document</b>   | HE1   |
| <b>Name of respondent (or client)</b>  | Hampshire Hospitals NHS Foundation Trust  |
| <b>Personal reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust   |
| <b>Full reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/17/HE1  |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Amend to reflect the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations and keeping historic assets in continuous use.   |
| <b>What is your suggested wording or text for the policy?</b>                            |   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | No  |



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

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| <b>Policy/Evidence base document</b>   | HE1  |
| <b>Name of respondent (or client)</b>  | Shirlene Oh  |
| <b>Personal reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust  |
| <b>Full reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/17/HE1   |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>Full response on website<br/> Strategic Policy HE1 HE2 HE8 HE9 HE14<br/> The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.<br/> The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |
| <b>What is your suggested wording or text for the policy?</b>                            |  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   |  |

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| <p><b>Have you submitted supporting information?</b><br/><i>All relevant information related to the specific policy or allocation has 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<br/><a href="#">Letter (Commenting on policies)</a></p> |
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**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

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| Local Plan Reference or document   | Policy HE2<br>All Heritage Assets (both designated and non-designated) |           |
| Total Number of Representations received   | 6  |           |
| Number of respondents who confirmed they consider the policy is –  | <b>Yes</b>   | <b>No</b> |
| Legally Compliant  | 4  | 0         |
| Sound  | 3  | 1         |
| Complies with Duty to Cooperate  | 4  | 0         |
| <p><b>Summary of Representations</b><br/> A number of representations support this policy.</p> <p>Respondents emphasise the necessity for clarity and consistency in policy wording to avoid misinterpretation, notably in relation to the setting of a heritage asset and its significance and for alignment with the NPPF.</p> <p>The policy needs to provide for flexibility and adaptability to meet modern needs, particularly in upholding energy efficiency and Net Carbon Zero targets, without compromising on historical preservation or rendering upgrades financially prohibitive.</p> |  |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)<br/> <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br/> <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/32/HE2</b><br/> ANON-AQTS-3BSY-T/45/HE2<br/> ANON-AQTS-3BQA-Z/10/HE2<br/> <b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/10/HE2</b><br/> <b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/10/HE2</b></p>   |  |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Need for clarity in policy expression in relation to its setting to ensure a consistent approach and interpretation; and</li> <li>• Flexibility for sustainable, climate-conscious upgrades, and installation of modern, high-tech infrastructure.</li> </ul>  |  |           |

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| <b>Policy/Evidence base document</b>   | HE2  |
| <b>Name of respondent (or client)</b>  | Guy Robinson   |
| <b>Personal reference number</b>   | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>   |  |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>I am not sure that the final clause of the first paragraph is needed i.e. “(the results from which needs to be submitted in a Heritage Statement)”. When the following paragraph refers to the need for a Heritage Statement, reference to a Heritage Statement in the prior paragraph feels a bit repetitive. While reference to heritage at risk in the final section of the policy is welcome, I suggest making a minor modification to clarify what is meant by “proposals for heritage assets”.</p> <p>We note the national Register currently includes several conservation areas, which are unlikely to be removed from the register under the circumstances outlined. The national Register also includes Scheduled Monuments, where the main risk is from arable ploughing, and where a broader approach is needed (often linked with land use). The core focus for this policy intent, we infer, is buildings and other structures. Also, we query the final phrase relating to removal of the asset from those registers. This is admirable but may not always be practicable.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |
| <b>What is your suggested wording or text for the policy?</b>                            | <p>“Heritage assets should be conserved in a manner appropriate to their significance. Applicants must describe the significance of any affected heritage assets, using appropriate expertise and assessment, including a desk-based assessment (where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest), and where necessary heritage impact assessment and/or field evaluation (the results from which needs to be submitted in a Heritage Statement).” “Any proposals directly affecting buildings and other structures for heritage assets included in the council’s ‘Buildings at Risk Register’, or the Historic England ‘Heritage At Risk Register’, shall include works including repairs to enable the removal of that heritage asset from those registers.”</p>   |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |

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| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE2  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding  |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council        |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/32/HE2 |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | Support Policy HE2   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session               |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>           |



|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE2  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/45/HE2                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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   |

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| <b>Policy/Evidence base document</b>   | HE2   |
| <b>Name of respondent (or client)</b>  | Abigail Heath (Savills UK LTD) on behalf of Bloor Homes   |
| <b>Personal reference number</b>   | ANON-AQTS-3BQA-Z  |
| <b>Full reference number</b>   | ANON-AQTS-3BQA-Z/10/HE2   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | Yes   |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Policy HE2 All Heritage Assets, is noted to be a conglomeration of Paragraphs 200-201 of the NPPF, setting out the requirements of applicants in relation to assessment of the significance of heritage assets. Bloor however raise concern with the wording “describing the significance of affected heritage assets and/or their settings”. It is considered that this statement runs the risk that the ‘setting’ of a heritage asset could be attributed its own significance, whereas significance of an asset may derive from its setting (NPPG Paragraph: 006 Reference ID: 18a-006-20190723). Bloor advise that the statement is amended to “describing the significance of affected heritage assets including any contribution made by their setting” which more closely reflects the language in NPPF Paragraph 200. |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>                               | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Policy HE2 All Heritage Assets, is noted to be a conglomeration of Paragraphs 200-201 of the NPPF, settin   |
| <b>What is your suggested wording or text for the policy?</b>  | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Policy HE2 All Heritage Assets, is noted to be a conglomeration of Paragraphs 200-201 of the NPPF, settin   |
| <b>Do you agree with how the policy will be monitored?</b>   |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or</i> | Yes<br><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a><br><a href="#">Supporting document 1 (South Winchester Vision Document)</a><br><a href="#">Supporting document 2 (Response to the delivery of housing)</a>   |

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

[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\)](#)

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| <b>Policy/Evidence base document</b>   | HE2   |
| <b>Name of respondent (or client)</b>  | Hampshire Hospitals NHS Foundation Trust  |
| <b>Personal reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust   |
| <b>Full reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/10/HE2  |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Amend to reflect the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations and keeping historic assets in continuous use.   |
| <b>What is your suggested wording or text for the policy?</b>                            | -   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | No  |

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

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE2  |
| <b>Name of respondent (or client)</b>  | Shirlene Oh  |
| <b>Personal reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust  |
| <b>Full reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/10/HE2   |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>Full response on website<br/> Strategic Policy HE1 HE2 HE8 HE9 HE14<br/> The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.<br/> The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |
| <b>What is your suggested wording or text for the policy?</b>                            |  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   |  |

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

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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed modifications](#) to Policy HE2 in response to comments from Historic England, after a post Regulation 19 meeting between the Council and Historic England.

[Proposed modification](#) agreed with Historic England in response to the wording of paragraph 8.4.



| Local Plan Reference or document   | Policy HE3<br>Designated Heritage Assets |           |
|--|--|-----------|
| <b>Total Number of Representations received</b>  | 4  |           |
| <b>Number of respondents who confirmed they consider the policy is –</b>   | <b>Yes</b>                               | <b>No</b> |
| <b>Legally Compliant</b>   | 3  | 0         |
| <b>Sound</b>   | 3  | 0         |
| <b>Complies with Duty to Cooperate</b>   | 3  | 0         |
| <p><b>Summary of Representations</b><br/> Support for the policy.</p> <p>Concern about repetitiveness and overlap with national policies, indicating a need for simplification to make the policy more effective.</p>  |  |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)<br/> <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br/> <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/66/HE3</b><br/> ANON-AQTS-3BSY-T/87/HE3<br/> ANON-AQTS-3BQA-Z/20/HE3</p> |  |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Overlap and repetition with national policies.</li> </ul>  |  |           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE3  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE3  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding  |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council        |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/66/HE3 |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | Support Policy HE3   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session               |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE3  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/87/HE3                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE3  |
| <b>Name of respondent (or client)</b>  | Abigail Heath (Savills UK LTD) on behalf of Bloor Homes  |
| <b>Personal reference number</b>   | ANON-AQTS-3BQA-Z   |
| <b>Full reference number</b>   | ANON-AQTS-3BQA-Z/20/HE3  |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | Yes  |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm, are reflections on paragraphs 205-208, paragraph 209 and paragraphs 210-211 of the NPPF respectively. The policies largely repeat the language of these Paragraphs (almost verbatim). Bloor consider that these policies should be amended or removed as Local Plan policies should not repeat national policy or seek to duplicate existing non-strategic process and policies. While Bloor recognise that this does not bring into the question of soundness, it makes the Local Plan longer and more complex than is necessary. |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Prote  |
| <b>What is your suggested wording or text for the policy?</b>                            | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Prote  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a><br><a href="#">Supporting document 1 (South Winchester Vision Document)</a>   |

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

[Supporting document 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\)](#)

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

| Local Plan Reference or document   | Policy HE4<br>Non-designated Heritage Assets |           |
|--|--|-----------|
| <b>Total Number of Representations received</b>  | 6  |           |
| <b>Number of respondents who confirmed they consider the policy is –</b>   | <b>Yes</b>                                   | <b>No</b> |
| <b>Legally Compliant</b>   | 4  | 1         |
| <b>Sound</b>   | 3  | 2         |
| <b>Complies with Duty to Cooperate</b>   | 5  | 0         |
| <p><b>Summary of Representations</b></p> <p>Some question whether the policy is needed due to overlap with NPPF, whilst others support a policy to conserve non-designated heritage assets. Some see local lists as being crucial. This is in terms of empowering local authorities to protect locally significant yet non-designated heritage structures effectively and improve conservation outcomes for unlisted buildings and safeguarding features of historical or architectural importance and accordingly request that the policy retains the aspiration of preparing a list of non-designated heritage assets.</p> |  |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/31/HE4</b></p> <p>ANON-AQTS-3BSY-T/44/HE4</p> <p>ANON-AQTS-329Q-8/20/HE4,</p> <p>ANON-AQTS-3BQA-Z/9/HE4</p> <p>BHLF-AQTS-326P-4/4/HE4</p>  |  |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Overlap of policy with NPPF;</li> <li>• The need to retain the aspiration to prepare a local list given the value of local lists to protect unlisted, significant buildings.</li> </ul>  |  |           |



|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE4  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE4  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding  |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council        |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/31/HE4 |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | Support Policy HE4   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session               |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE4  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/44/HE4                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |   |
|--|---|
| <b>Policy/Evidence base document</b>   | HE4   |
| <b>Name of respondent (or client)</b>  | Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)  |
| <b>Personal reference number</b>   | ANON-AQTS-329Q-8  |
| <b>Full reference number</b>   | ANON-AQTS-329Q-8/20/HE4   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | Whilst Bloor Homes supports the thrust of the policy, it should be amended to read “Where development proposals would result in harm to the significance of non- designated heritage assets, in accordance with the NPPF, a balanced judgment will be made, having regard to the scale of the harm or loss and the significance of the asset” to ensure that it is wholly compliant with paragraph 209 of the NPPF. Alternatively, given this amendment would essentially repeat the requirements of the NPPF, this policy should be removed. |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>   | Whilst Bloor Homes supports the thrust of the policy, it should be amended to read “Where development proposals would result in harm to the significance of non- designated heritage assets, in accordance with the NPPF, a balanced judgment will be made, hav   |
| <b>What is your suggested wording or text for the policy?</b>  | Whilst Bloor Homes supports the thrust of the policy, it should be amended to read “Where development proposals would result in harm to the significance of non- designated heritage assets, in accordance with the NPPF, a balanced judgment will be made, hav   |
| <b>Do you agree with how the policy will be monitored?</b>   |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b><br><i>All 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<br><a href="#">Letter (commenting on policies, policies map and evidence base)</a><br><a href="#">Vision document (Land At Mill Lane, Wickham)</a>  |

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

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE4  |
| <b>Name of respondent (or client)</b>  | Abigail Heath (Savills UK LTD) on behalf of Bloor Homes  |
| <b>Personal reference number</b>   | ANON-AQTS-3BQA-Z   |
| <b>Full reference number</b>   | ANON-AQTS-3BQA-Z/9/HE4   |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | Yes  |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm, are reflections on paragraphs 205-208, paragraph 209 and paragraphs 210-211 of the NPPF respectively. The policies largely repeat the language of these Paragraphs (almost verbatim). Bloor consider that these policies should be amended or removed as Local Plan policies should not repeat national policy or seek to duplicate existing non-strategic process and policies. While Bloor recognise that this does not bring into the question of soundness, it makes the Local Plan longer and more complex than is necessary. |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Prote  |
| <b>What is your suggested wording or text for the policy?</b>                            | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Prote  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a><br><a href="#">Supporting document 1 (South Winchester Vision Document)</a>   |

|   |  |
|---|--|
| <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><a href="#"><u>Supporting document 2 (Response to the delivery of housing)</u></a><br/><a href="#"><u>Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</u></a><br/><a href="#"><u>Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</u></a><br/><a href="#"><u>Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</u></a></p> |
|---|--|

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE4  |
| <b>Name of respondent (or client)</b>  | Tessa Robertson  |
| <b>Personal reference number</b>   | BHLF-AQTS-326P-4   |
| <b>Full reference number</b>   | BHLF-AQTS-326P-4/4/HE4   |
| <b>Legally compliant?</b>  | No   |
| <b>Sound?</b>  | No   |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | <p>Full representation on website.</p> <p>In the objections set out in our comments we contend that the current draft of the plan is unsound on the grounds either of being unjustified or ineffective and in some instances not consistent with the draft National Planning Policy Framework 2024 (NPPF).</p> <p>In the Regulation 18 consultation the Trust objected to the absence in Policy HE4 of any reference to the possibility of the local authority providing a local list of non-designated heritage assets. The Trust has, for many years, sought such a list (see City of Winchester Trust's 2018 A Vision for Winchester').</p> <p>The adopted Local Plan (LPP2) refers in supporting text 6.4.105 – 109 and in Policy DM31 the value of a local list and its possible preparation in the future. The Trust would like to see a similar wording included in Policy HE4 as it keeps alive the aspiration of a local list being produced.</p> <p>The NPPF recognizes the value of local lists as it specifically refers to these in the definition of heritage assets in the glossary.</p> <p>Para 6.4.110 of LPP2 of the current Local Plan recognizes the value of a local list with an example of when it would be helpful as follows: "Some of these buildings and structures will have historic or architectural value and the planning authority will consider whether or not there is justification to include a redundant building on the local list as an 'un-designated heritage asset.'</p> <p>Such a list would raise the visibility of such buildings and so give greater protection to significant unlisted buildings outside conservation areas which might otherwise be harmed or lost which we believe has happened in Winchester Town. It is also worth remembering that the category of non-designated heritage assets is wide and is not just limited to buildings but can extend to any feature that has heritage significance.</p> <p>The Trust re-iterates its request that the policy retains the aspiration of preparing a list of non-designated heritage assets.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |



|   |   |
|---|---|
| <b>What is your suggested wording or text for the policy?</b>   |   |
| <b>Do you agree with how the policy will be monitored?</b>  |   |
| <b>If no, please explain</b>  |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate                            |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Form (copy of form - response detailed in letter)</a><br><a href="#">Letter (commenting on policies)</a> |

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

|  |  |           |
|--|--|-----------|
| Local Plan Reference or document   | Policy HE5<br>Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm |           |
| Total Number of Representations received   | 7  |           |
| Number of respondents who confirmed they consider the policy is –  | <b>Yes</b>   | <b>No</b> |
| Legally Compliant  | 4  | 1         |
| Sound  | 3  | 3         |
| Complies with Duty to Cooperate  | 5  | 0         |
| <p><b>Summary of Representations</b></p> <p>There are concerns that Policy HE5 unnecessarily duplicates the National Planning Policy Framework (NPPF).</p> <p>The policy applies the same level of control to both designated heritage assets (irrespective of their status) and to non designated heritage assets.</p> <p>The policy requires excessive recording which should be proportionate to the asset's importance.</p> <p>The policy is unclear and inconsistent, especially concerning archaeology and historic buildings, and should be refined to provide appropriate mitigation based on the asset's value.</p> |  |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/43/HE5</b></p> <p>ANON-AQTS-3BSY-T/56/HE5</p> <p>ANON-AQTS-329Q-8/25/HE5</p> <p>ANON-AQTS-3BQA-Z/15/HE5</p> <p>ANON-AQTS-32MQ-V/4/HE5</p> <p>BHLF-AQTS-328K-1/11/HE5</p>   |  |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Policy is unclear and inconsistent and should be refined to provide appropriate/proportionate evaluation/mitigation based on the asset's value</li> <li>• Repetition with national policy; and</li> <li>• Needs to be more distinction to the approach for designated vs non-designated assets.</li> </ul>   |  |           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE5  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

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|---|--|
| <b>Policy/Evidence base document</b>  | HE5  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding  |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council        |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/43/HE5 |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | Support Policy HE5   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session               |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>           |

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| <b>Policy/Evidence base document</b>  | HE5  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/56/HE5                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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   |

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| <b>Policy/Evidence base document</b>   | HE5  |
| <b>Name of respondent (or client)</b>  | Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)   |
| <b>Personal reference number</b>   | ANON-AQTS-329Q-8   |
| <b>Full reference number</b>   | ANON-AQTS-329Q-8/25/HE5  |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | No   |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | <p>The first paragraph of the policy would benefit from being worded in a way which reflects the actual tests in the NPPF. Strictly, the circumstances in which the LPA will permit loss of whole or part of a building should not be because it is loss per se, but because the tests for substantial/less than substantial harm etc are met. The recording element of HE5 is also considered to be excessive, as not all cases where significance is harmed by consented proposals will merit recording, which is currently the implication of the text.</p> <p>Suggested revised text for HE5:</p> <p>The local planning authority will not permit the loss of the whole or part of a heritage asset unless the relevant tests set out in Policies HE3 and HE4, which reflect those in the NPPF, are met and that all reasonable steps (such as legal agreement) have been taken to ensure the new development will proceed after the loss has occurred.</p> <p>In cases where the significance of any heritage asset is harmed or lost (wholly or in part), the local planning authority may require an appropriate programme of recording to advance understanding. This recording should be carried out using appropriate expertise, be proportionate and be made publicly accessible. As a minimum, it should be provided to the local authority for inclusion in the Winchester Historic Environment Record.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | The first paragraph of the policy would benefit from being worded in a way which reflects the actual tests in the NPPF. Strictly, the circumstances in which the LPA will permit loss of whole or part of a building should not be because it is loss per se, b  |
| <b>What is your suggested wording or text for the policy?</b>                            | The first paragraph of the policy would benefit from being worded in a way which reflects the actual tests in the NPPF. Strictly, the circumstances in which the LPA will permit loss of whole or part of a building should not be because it is loss per se, b  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |

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| <b>Do you want to participate in hearing sessions for this policy?</b>  | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies, policies map and evidence base)</a><br><a href="#">Vision document (Land At Mill Lane, Wickham)</a> |



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| <b>Policy/Evidence base document</b>   | HE5  |
| <b>Name of respondent (or client)</b>  | Abigail Heath (Savills UK LTD) on behalf of Bloor Homes  |
| <b>Personal reference number</b>   | ANON-AQTS-3BQA-Z   |
| <b>Full reference number</b>   | ANON-AQTS-3BQA-Z/15/HE5  |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | Yes  |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Protecting the Significance of Heritage Assets (designated and non-designated heritage assets) and Mitigating Unavoidable Harm, are reflections on paragraphs 205-208, paragraph 209 and paragraphs 210-211 of the NPPF respectively. The policies largely repeat the language of these Paragraphs (almost verbatim). Bloor consider that these policies should be amended or removed as Local Plan policies should not repeat national policy or seek to duplicate existing non-strategic process and policies. While Bloor recognise that this does not bring into the question of soundness, it makes the Local Plan longer and more complex than is necessary. |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Prote  |
| <b>What is your suggested wording or text for the policy?</b>                            | PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.<br>Bloor note that policies HE3 Designated Heritage Assets, HE4 Non-Designated Heritage Assets and HE5 Prote  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Letter (commenting on Policies &amp; Evidence Base)</a><br><a href="#">Supporting document 1 (South Winchester Vision Document)</a>   |

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| <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><a href="#"><u>Supporting document 2 (Response to the delivery of housing)</u></a><br/><a href="#"><u>Supporting document 3 (Technical Note 1 - Sustainability &amp; Transport)</u></a><br/><a href="#"><u>Supporting document 4 (Technical Note 2 - Transport Feasibility Report)</u></a><br/><a href="#"><u>Supporting document 5 (Statement of Common Ground between Bloor Homes &amp; Stagecoach (South) Ltd)</u></a></p> |
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| <b>Policy/Evidence base document</b>   | HE5   |
| <b>Name of respondent (or client)</b>  | Union4 Planning Ltd   |
| <b>Personal reference number</b>   | ANON-AQTS-32MQ-V  |
| <b>Full reference number</b>   | ANON-AQTS-32MQ-V/4/HE5  |
| <b>Legally compliant?</b>  | No  |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>We support the general thrust and structure of policies HE1-HE4 of the Plan as proposed, which adopt a hierarchy of control that reflects the relative importance of heritage assets and broadly reflect that set out within the NPPF. We have concerns however, that policy HE5 as proposed, does not reflect the balanced approach set out in national policy and applies the same level of control to both designated heritage assets (irrespective of their status) and to non designated heritage assets. The latter may be of limited or local importance and may appropriately be recorded prior to development progressing. It is inappropriate therefore, to say within the policy that:</p> <p>‘The local planning authority will not permit the loss of the whole or part of a heritage asset without being satisfied that the harm is unavoidable....’</p> <p>This sentence should be deleted. As the policy is actually about securing appropriate mitigation, the approach to the consent of development should be left to policies HE1-HE4 and the approach to securing appropriate mitigation should be dealt with in this policy.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | <p>‘The local planning authority will not permit the loss of the whole or part of a heritage asset without being satisfied that the harm is unavoidable....’</p> <p>This sentence should be deleted.</p>  |
| <b>What is your suggested wording or text for the policy?</b>                            | <p>‘The local planning authority will not permit the loss of the whole or part of a heritage asset without being satisfied that the harm is unavoidable....’</p> <p>This sentence should be deleted.</p>  |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Letter (commenting on policies)</a>  |

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

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| <b>Policy/Evidence base document</b>   | HE5  |
| <b>Name of respondent (or client)</b>  | Winchester College   |
| <b>Personal reference number</b>   | BHLF-AQTS-328K-1   |
| <b>Full reference number</b>   | BHLF-AQTS-328K-1/11/HE5  |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  | No   |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>Representation made by Winchester College – Regulation 19 consultation</p> <p>Winchester College notes the Officer's comments, however, there appears to be an inconsistency between the intention for this policy and the policy text as drafted. The officer comments that 'the principal application of this policy will be to archaeological issues (where in the NPPF, presently non-designated archaeological remains can be of equivalent importance to designated archaeological remains (i.e. scheduled monuments), but HE5 will occasionally apply to historic buildings.' If policy HE5 is only intended to apply to archaeology, then the title and policy text should be amended accordingly. The policy cannot 'occasionally apply to historic buildings' as there are no criteria or an explanation in the policy to explain when it would be applicable to such assets. The policy as drafted is unclear and ambiguous and is therefore not sound. Winchester College refers the Council to its original objection to policy HE5, which, as worded, applies equally to all heritage assets and does not distinguish between designated and non-designated heritage assets. This is not in accordance with NPPF (2023) and National Planning Practice Guidance, which makes clear the difference between designated and non-designated heritage assets and that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset (NPPF paragraph 209).</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | additional text is underlined:   |
| <b>What is your suggested wording or text for the policy?</b>                            | If policy HE5 is only intended to apply to archaeology, then the title and policy text should be amended accordingly. The policy cannot 'occasionally apply to historic buildings' as there are no criteria or an explanation in the policy to explain when it   |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |

|   |   |
|---|---|
| <b>Do you want to participate in hearing sessions for this policy?</b>  | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate                        |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Form (commenting on policies)</a><br><a href="#">Supporting information (Map - Blackbridge Yard)</a> |

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

| Local Plan Reference or document  | Policy HE6<br>Scheduled Monuments and Nationally Important Non-Designated Assets |           |
|---|--|-----------|
| <b>Total Number of Representations received</b>   | 5  |           |
| <b>Number of respondents who confirmed they consider the policy is –</b>  | <b>Yes</b>   | <b>No</b> |
| <b>Legally Compliant</b>  | 3  | 0         |
| <b>Sound</b>  | 2  | 2         |
| <b>Complies with Duty to Cooperate</b>  | 3  | 0         |
| <p><b>Summary of Representations</b><br/>Support for policy.</p> <p>Policy needs clarity in differentiating between designated and non-designated assets. Stakeholders, including Winchester College and Historic England, point out the ambiguity in application criteria and call for clear guidelines on determining national importance for non-designated heritage assets. The need to separate and prioritise actions for avoiding harm versus minimising it is emphasised. Furthermore, clarity is sought on involving Historic England, specifically when Scheduled Monuments are concerned. One respondent queried who determines the national importance of non-designated assets.</p> <p>Another respondent supported the the protection of these heritage assets and the evidence required as part of an application that has the potential to impact a scheduled monument (Portsdown Hill).</p> <p>In summary there is a need for clearer definitions and distinctions within Policy HE6 to ensure effective and consistent application.</p> |  |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)<br/> <b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/58/HE6</b><br/> ANON-AQTS-3BSY-T/73/HE6<br/> <b>ANON-AQTS-32U8-B - Historic England/6/HE6</b><br/> BHLF-AQTS-328K-1/15/HE6<br/> <b>BHLF-AQTS-32Q2-1/5/HE6 - Portsmouth City Council</b></p>   |  |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Need for clarity in differentiating between designated and non-designated archaeological assets;</li> <li>• Need for clearer distinctions within Policy HE6 to ensure it is effective and can be applied consistently in relation to avoidance and minimization of harm; and</li> <li>• Support for the policy.</li> </ul>  |  |           |



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|---|--|
| <b>Policy/Evidence base document</b>  | HE6  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding  |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council        |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/58/HE6 |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | Support Policy HE6   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session               |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE6  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/73/HE6                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |   |
|--|---|
| <b>Policy/Evidence base document</b>   | HE6   |
| <b>Name of respondent (or client)</b>  | Guy Robinson  |
| <b>Personal reference number</b>   | ANON-AQTS-32U8-B - Historic England   |
| <b>Full reference number</b>   | ANON-AQTS-32U8-B - Historic England/6/HE6   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>We object to this policy principally because it could be read as putting minimisation of harm on a par with avoidance. For these nationally important archaeological assets, a sound approach aligning with national policy needs to underscore that avoiding harm (which tends to involve preservation in situ) is the preferred option. To bring this to the fore, we advise moving the final line to the start of the policy and splitting avoidance and minimisation into separate actions.</p> <p>Also, we recommend being clear in the title of the policy and its main text that reference to non-designated heritage assets (NDHA) are those with archaeological interest, rather than any NHDA.</p> <p>Finally, while we welcome reference to making contact with Historic England, for completeness this should cover the scenario where proposals may affect Scheduled Monuments and our view is sought on how to proceed.</p>  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |   |
| <b>What is your suggested wording or text for the policy?</b>                            | <p>Policy HE6: Scheduled Monuments and Nationally Important Non-designated Archaeological Assets<br/>Proposals should take a positive approach to archaeology, by avoiding locating development on sensitive areas and designing development that responds positively</p> <p>Policy HE6 Scheduled Monuments and Nationally Important Non-designated Archaeological Assets<br/>Proposals should take a positive approach to archaeology, by avoiding locating development on sensitive areas and designing development that responds positively to the significance of archaeological features, including their settings. Applications for planning permission which affect, or may affect a scheduled monument, or its setting, should be supported by appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm. Where harm is unavoidable, proposals should explain the reasons why and outline steps to minimise harm. Historic England should be notified where a sScheduled mMonument cConsent (SMC) is required in addition to planning permission and/or if the proposals may affect a Scheduled</p> |

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|  | <p>Monument and/or its setting. Applications which affect, or may affect, a non-designated heritage archaeological asset that is potentially of national importance will be required to provide appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm. The Winchester City Council Archaeological Advisor / Archaeologist should be consulted on proposals that have the potential</p> <p>Applications will be determined also in accordance with Policy HE3 on designated heritage assets. Additionally, proposals should take a positive approach to archaeology, by avoiding locating development on sensitive areas and designing development that responds positively to the significance of archaeological features, including their settings.</p> |
| <p><b>Do you agree with how the policy will be monitored?</b></p>  |  |
| <p><b>If no, please explain</b></p>  |  |
| <p><b>Do you want to participate in hearing sessions for this policy?</b></p>  | <p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>  |
| <p><b>Have you submitted supporting information?</b><br/> <i>All relevant information related to the specific policy or allocation has 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<br/> <a href="#">Letter (commenting on policies)</a><br/> <a href="#">Email correspondence (between officers and Historic England)</a><br/> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a></p>  |

|  |   |
|--|---|
| <b>Policy/Evidence base document</b>   | HE6   |
| <b>Name of respondent (or client)</b>  | Winchester College  |
| <b>Personal reference number</b>   | BHLF-AQTS-328K-1  |
| <b>Full reference number</b>   | BHLF-AQTS-328K-1/15/HE6   |
| <b>Legally compliant?</b>  |   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   |   |
| <b>Policy/Document comment</b>   | <p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Representation made by Winchester College – Regulation 19 consultation<br/> Winchester College seeks clarification on the Officer’s response to the objection made at the Regulation 18 stage as it is not considered that these have been addressed – particularly the criteria for determining which non-designated heritage assets are considered to be of national importance are missing, as are details of who will make this judgement. No information has been provided on this, therefore, the policy is ambiguous about how it should be applied.</p> <p>Further, it is not clear what is intended by the response ‘HE7 refers to specifically to non designated archaeological assets and therefore non designated assets are included within policy HE6.’ Winchester College maintains its original objection that is - as the City Council is proposing a separate policy - Policy HE7 which covers non-designated archaeological assets, reference to these assets can be deleted from Policy HE6.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Winchester College seeks clarification on the Officer’s response to the objection made at the Regulation 18 stage as it is not considered that these have been addressed – particularly the criteria for determining which non-designated heritage assets are c   |
| <b>What is your suggested wording or text for the policy?</b>                            | As the City Council is proposing a separate policy - Policy HE7 which covers nondesignated archaeological assets, reference to these assets can be deleted from Policy HE6.   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Form (commenting on policies)</a>  |

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

[Supporting information \(Map - Blackbridge Yard\)](#)

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| <b>Policy/Evidence base document</b>   | HE6  |
| <b>Name of respondent (or client)</b>  | Tom Bell   |
| <b>Personal reference number</b>   | BHLF-AQTS-32Q2-1 - Portsmouth City Council   |
| <b>Full reference number</b>   | BHLF-AQTS-32Q2-1 - Portsmouth City Council/5/HE6   |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | 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. |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>                               |  |
| <b>What is your suggested wording or text for the policy?</b>  |  |
| <b>Do you agree with how the policy will be monitored?</b>   |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>   | No, I don't want to take part in a hearing session   |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or</i> | Yes<br><a href="#">Letter (commenting on policies)</a>   |

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



**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed modifications](#) agreed in response to the matters raised by Historic England (Title of Policy HE6 and the wording of Policy HE6).

|   |  |           |
|---|--|-----------|
| Local Plan Reference<br>or document   | Policy HE7<br>Non-designated Archaeological Assets |           |
| Total Number of Representations received  | 4  |           |
| Number of respondents who confirmed they consider the policy is –   | <b>Yes</b>   | <b>No</b> |
| Legally Compliant   | 3  | 0         |
| Sound   | 2  | 1         |
| Complies with Duty to Cooperate   | 3  | 0         |
| <b>Summary of Representations</b><br>The policy has been well-received overall. There is concern about the repetitive nature of the text referring to development impacting archaeological sites. Policy needs to be clearer and more concise to enhance its understanding and effectiveness.   |  |           |
| <b>Representation Numbers</b> (Statutory consultees in bold and named)<br><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/9/HE7</b><br>ANON-AQTS-3BSY-T/14/HE7<br>ANON-AQTS-329Q-8/6/HE7 |  |           |
| <b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• Policy lacks clarity and is repetitive.</li> </ul>   |  |           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE7  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   |  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  | We are not convinced that the first paragraph is needed (not least because it does not make clearer when the policy applies) and could be deleted. Note the final paragraph is repeated.   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |   |
|---|---|
| <b>Policy/Evidence base document</b>  | HE7   |
| <b>Name of respondent (or client)</b>   | Lisa Fielding   |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council       |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/9/HE7 |
| <b>Legally compliant?</b>   | Yes   |
| <b>Sound?</b>   | Yes   |
| <b>Complies with duty to co-operate?</b>  | Yes   |
| <b>Policy/Document comment</b>  | Support Policy HE7  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |   |
| <b>What is your suggested wording or text for the policy?</b>   |   |
| <b>Do you agree with how the policy will be monitored?</b>  |   |
| <b>If no, please explain</b>  |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session              |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>          |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE7  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/14/HE7                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE7  |
| <b>Name of respondent (or client)</b>   | Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)   |
| <b>Personal reference number</b>  | ANON-AQTS-329Q-8   |
| <b>Full reference number</b>  | ANON-AQTS-329Q-8/6/HE7   |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | No   |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy wording repeats itself: the 'Where development affecting archaeological assets...' section is in there twice.                               |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  | The policy wording repeats itself: the 'Where development affecting archaeological assets...' section is in there twice.                               |
| <b>What is your suggested wording or text for the policy?</b>   | The policy wording repeats itself: the 'Where development affecting archaeological assets...' section is in there twice.                               |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies, policies map and evidence base)</a><br><a href="#">Vision document (Land At Mill Lane, Wickham)</a> |

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed modifications](#) agreed in response to the matters raised by Historic England (deleting text and the wording of Policy HE7)

| Local Plan Reference or document  | Policy HE8<br>Applications Affecting Listed Buildings |           |
|---|---|-----------|
| <b>Total Number of Representations received</b>   | 4   |           |
| <b>Number of respondents who confirmed they consider the policy is –</b>  | <b>Yes</b>  | <b>No</b> |
| <b>Legally Compliant</b>  | 2   | 0         |
| <b>Sound</b>  | 1   | 1         |
| <b>Complies with Duty to Cooperate</b>  | 2   | 0         |
| <p><b>Summary of Representations</b><br/> Concern in relation to the challenge of balancing the preservation of heritage buildings with the need for modernisation. There is a need to enable historical structures to remain functional through the integration of up-to-date technology and infrastructure, ensuring they contribute to energy efficiency goals such as achieving Net Carbon Zero. There is support for policies that advocate a flexible and modern approach to heritage asset management. Concern the policy stifles the adaptation of historic buildings to become more energy-efficient and sustainable. There should also be a balance between preservation and financial viability.</p> |   |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)<br/> <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br/> ANON-AQTS-3BSY-T/32/HE8<br/> <b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/5/HE8</b><br/> <b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/5/HE8</b></p>  |   |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Challenge of balancing the preservation of heritage buildings with the need for modernisation, energy efficiency and financial viability.</li> </ul>  |   |           |



|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE8  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE8  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/32/HE8                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |   |
|--|---|
| <b>Policy/Evidence base document</b>   | HE8   |
| <b>Name of respondent (or client)</b>  | Hampshire Hospitals NHS Foundation Trust  |
| <b>Personal reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust   |
| <b>Full reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/5/HE8   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Amend to reflect the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations and keeping historic assets in continuous use.   |
| <b>What is your suggested wording or text for the policy?</b>                            | -   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | No  |

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

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE8  |
| <b>Name of respondent (or client)</b>  | Shirlene Oh  |
| <b>Personal reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust  |
| <b>Full reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/5/HE8  |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>Full response on website<br/> Strategic Policy HE1 HE2 HE8 HE9 HE14</p> <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |
| <b>What is your suggested wording or text for the policy?</b>                            |  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   |  |

|   |  |
|---|--|
| <p><b>Have you submitted supporting information?</b><br/><i>All relevant information related to the specific policy or allocation has 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<br/><a href="#">Letter (Commenting on policies)</a></p> |
|---|--|

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

| Local Plan Reference or document   | Policy HE9<br>Change of Use to Listed Buildings |           |
|--|---|-----------|
| <b>Total Number of Representations received</b>  | 4   |           |
| <b>Number of respondents who confirmed they consider the policy is –</b>   | <b>Yes</b>                                      | <b>No</b> |
| <b>Legally Compliant</b>   | 2   | 0         |
| <b>Sound</b>   | 1   | 1         |
| <b>Complies with Duty to Cooperate</b>   | 2   | 0         |
| <p><b>Summary of Representations</b><br/> Comments focus on balancing heritage conservation with modern needs, ensuring buildings remain functional and economically viable. Request for flexibility that allows the integration of energy-efficient and modern technological solutions without compromising historical contexts or prohibitive costs.</p>   |   |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)<br/> <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br/> ANON-AQTS-3BSY-T/25/HE9<br/> <b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/3/HE9</b><br/> <b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/3/HE9</b></p> |   |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Challenge of balancing the preservation of heritage buildings with the need for modernisation, energy efficiency and financial viability.</li> </ul>   |   |           |



|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE9  |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE9  |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/25/HE9                            |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |   |
|--|---|
| <b>Policy/Evidence base document</b>   | HE9   |
| <b>Name of respondent (or client)</b>  | Hampshire Hospitals NHS Foundation Trust  |
| <b>Personal reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust   |
| <b>Full reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/3/HE9   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Amend to reflect the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations and keeping historic assets in continuous use.   |
| <b>What is your suggested wording or text for the policy?</b>                            | -   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | No  |

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

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE9  |
| <b>Name of respondent (or client)</b>  | Shirlene Oh  |
| <b>Personal reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust  |
| <b>Full reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/3/HE9  |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>Full response on website<br/> Strategic Policy HE1 HE2 HE8 HE9 HE14</p> <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |
| <b>What is your suggested wording or text for the policy?</b>                            |  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   |  |

|   |  |
|---|--|
| <p><b>Have you submitted supporting information?</b><br/><i>All relevant information related to the specific policy or allocation has 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<br/><a href="#">Letter (Commenting on policies)</a></p> |
|---|--|

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

|  |  |           |
|--|--|-----------|
| Local Plan Reference or document   | Policy HE10<br>Development in Conservation Areas |           |
| Total Number of Representations received   | 4  |           |
| Number of respondents who confirmed they consider the policy is –  | <b>Yes</b>                                       | <b>No</b> |
| Legally Compliant  | 2  | 0         |
| Sound  | 2  | 1         |
| Complies with Duty to Cooperate  | 2  | 0         |
| <p><b>Summary of Representations</b></p> <p>There is concern that it may not be possible to incorporate energy efficiency or energy generation measures into the design of the proposals without causing harm to the character and appearance of the area or the significance of a listed building.</p> <p>A response notes difficulties in applying the policy in terms of application of each criteria to both new developments vs alterations/extensions.</p> |  |           |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/29/HE10</b></p> <p>ANON-AQTS-3BSY-T/42/HE10</p> <p>BHLF-AQTS-328K-1/9/HE10</p>   |  |           |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Balance between historical preservation and environmental sustainability; and</li> <li>• Policy clarity and implementation required particularly with regard to its application to new buildings vs extensions/alterations in conservation areas.</li> </ul>   |  |           |



|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE10   |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |   |
|---|---|
| <b>Policy/Evidence base document</b>  | HE10  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding   |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council         |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/29/HE10 |
| <b>Legally compliant?</b>   | Yes   |
| <b>Sound?</b>   | Yes   |
| <b>Complies with duty to co-operate?</b>  | Yes   |
| <b>Policy/Document comment</b>  | Support Policy HE10   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |   |
| <b>What is your suggested wording or text for the policy?</b>   |   |
| <b>Do you agree with how the policy will be monitored?</b>  |   |
| <b>If no, please explain</b>  |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session                |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>            |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE10   |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/42/HE10                           |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |   |
|--|---|
| <b>Policy/Evidence base document</b>   | HE10  |
| <b>Name of respondent (or client)</b>  | Winchester College  |
| <b>Personal reference number</b>   | BHLF-AQTS-328K-1  |
| <b>Full reference number</b>   | BHLF-AQTS-328K-1/9/HE10   |
| <b>Legally compliant?</b>  |   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   |   |
| <b>Policy/Document comment</b>   | <p><b>This comment has been summarised – see supporting information for full response</b></p> <p>Representation made by Winchester College – Regulation 19 consultation<br/> Winchester College seek clarification from the Council in relation to the officer comment’s which state ‘To reiterate the policy refers to new buildings within conservation areas.’ However, Policy HE10 appears to be split into two parts with points i-iv referring to new buildings and points v-viii referring to ‘extensions and alterations’.</p> <p>Confirmation is required as to whether point viii applies to the development of extensions and alterations to buildings in the conservation area.</p> <p>For the avoidance of doubt, Winchester College maintains its original objection that it may not be possible to incorporate energy efficiency or energy generation measures into the design of the proposals without causing harm to the character and appearance of the area or the significance of a listed building.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Confirmation is required as to whether point viii applies to the development of extensions and alterations to buildings in the conservation area. For the avoidance of doubt, Winchester College maintains its original objection that it may not be possible t   |
| <b>What is your suggested wording or text for the policy?</b>                            | Confirmation is required as to whether point viii applies to the development of extensions and alterations to buildings in the conservation area. For the avoidance of doubt, Winchester College maintains its original objection that it may not be possible t   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Form (commenting on policies)</a>  |

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

[Supporting information \(Map - Blackbridge Yard\)](#)

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

|  |   |           |  |
|--|---|-----------|--|
| Local Plan Reference or document   | Policy HE11<br>Demolition in Conservation Areas |           |  |
| Total Number of Representations received   | 4   |           |  |
| Number of respondents who confirmed they consider the policy is –  | <b>Yes</b>                                      | <b>No</b> |  |
| Legally Compliant  | 3   | 0         |  |
| Sound  | 2   | 1         |  |
| Complies with Duty to Cooperate  | 3   | 0         |  |
| <p><b>Summary of Representations</b></p> <p>Support for the policy.</p> <p>The use of ‘exceptional circumstances’ is overly restrictive and does not relate to the circumstances in which the loss of unlisted buildings in conservation areas would actually be permitted. The issue is whether the loss will result in harm to the character and appearance of the conservation area, demonstration that a building is beyond repair and incapable of beneficial use is a consideration, but not the only determinant.</p> |   |           |  |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p><b>ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/44/HE11</b></p> <p>ANON-AQTS-3BSY-T/57/HE11</p> <p>ANON-AQTS-329Q-8/26/HE11</p>  |   |           |  |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Criteria is considered to be too restrictive; and</li> <li>• Need clarity within the policy text and alignment with heritage guidelines to ensure the policy is understood and can be consistently applied.</li> </ul>   |   |           |  |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE11   |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   |  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  | Criterion i includes an unwanted comma after “significance”.   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |



|   |   |
|---|---|
| <b>Policy/Evidence base document</b>  | HE11  |
| <b>Name of respondent (or client)</b>   | Lisa Fielding   |
| <b>Personal reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council         |
| <b>Full reference number</b>  | ANON-AQTS-3BEW-A - Littleton and Harestock Parish Council/44/HE11 |
| <b>Legally compliant?</b>   | Yes   |
| <b>Sound?</b>   | Yes   |
| <b>Complies with duty to co-operate?</b>  | Yes   |
| <b>Policy/Document comment</b>  | Support Policy HE11   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |   |
| <b>What is your suggested wording or text for the policy?</b>   |   |
| <b>Do you agree with how the policy will be monitored?</b>  |   |
| <b>If no, please explain</b>  |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session                |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a>            |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE11   |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/57/HE11                           |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE11   |
| <b>Name of respondent (or client)</b>  | Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)   |
| <b>Personal reference number</b>   | ANON-AQTS-329Q-8   |
| <b>Full reference number</b>   | ANON-AQTS-329Q-8/26/HE11   |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | No   |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | <p>Paragraph 8.34, p. 200: The use of 'exceptional circumstances' here is overly restrictive and does not relate to the circumstances in which the loss of unlisted buildings in conservation areas would actually be permitted. The more relevant consideration is whether the loss will result in harm to the character and appearance of the conservation through a positively contributing building (per NPPF, para. 213). The demonstration that a building is beyond repair and incapable of beneficial use is a consideration, not the only determinant.</p> <p>Suggested revised text for 8.34:<br/> ...Consent for demolition of such buildings will be granted only where any harm arising to the character and appearance of the conservation area is considered acceptable in line with the relevant tests set out in Policy HE3 for designated heritage assets.</p> <p>In turn, this should be reflected in the wording for Policy HE11, we'd suggest adding a fourth bullet point:<br/> iv. ...or where any harm arising to the character and appearance of the conservation area is considered acceptable in line with the relevant tests set out in Policy HE3 for designated heritage assets.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Paragraph 8.34, p. 200: The use of 'exceptional circumstances' here is overly restrictive and does not relate to the circumstances in which the loss of unlisted buildings in conservation areas would actually be permitted. The more relevant consideration i  |
| <b>What is your suggested wording or text for the policy?</b>                            | Paragraph 8.34, p. 200: The use of 'exceptional circumstances' here is overly restrictive and does not relate to the circumstances in which the loss of unlisted buildings in conservation areas would actually be permitted. The more relevant consideration i  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b>  | Yes<br><a href="#">Letter (commenting on policies, policies map and evidence base)</a>   |

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

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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed modification](#) in response to comments from Historic England

|  |  |           |
|--|--|-----------|
| Local Plan Reference or document   | Policy HE12<br>Registered Historic Parks and Gardens |           |
| Total Number of Representations received   | 2  |           |
| Number of respondents who confirmed they consider the policy is –  | <b>Yes</b>   | <b>No</b> |
| Legally Compliant  | 2  | 0         |
| Sound  | 1  | 1         |
| Complies with Duty to Cooperate  | 2  | 0         |
| <b>Summary of Representations</b><br>Policy HE12 underestimates the importance of RPGs by suggesting they hold only local significance, amendments are encouraged to reflect their broader importance, indicating their national or even international value in addition to their local relevance. |  |           |
| <b>Representation Numbers</b> (Statutory consultees in bold and named)<br>ANON-AQTS-3BSY-T/69/HE12<br><b>ANON-AQTS-32U8-B – Historic England/5/HE12</b>  |  |           |
| <b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>Clarify policy to reflect the status/value of parks and gardens.</li> </ul>   |  |           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE12   |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/69/HE12                           |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|  |  |
|--|--|
| <b>Policy/Evidence base document</b>   | HE12   |
| <b>Name of respondent (or client)</b>  | Guy Robinson   |
| <b>Personal reference number</b>   | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>   | ANON-AQTS-32U8-B - Historic England/5/HE12   |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | No   |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | The current wording seems to imply that RPGs are on a local register, which could imply there are only of local significance. This needs to be corrected. We suggest one way this might be achieved. Also, we believe the policy should be headed "Historic Parks and Gardens" to acknowledge that the policy covers more than Registered Parks and Gardens. Deleting "historic" in "Registered Historic Park and Garden" may also help to tighten this clarity.   |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>   |  |
| <b>What is your suggested wording or text for the policy?</b>  | Policy HE12 Registered Historic Parks and Gardens<br>"Proposals which accord with the Development Plan will be permitted provided they do not result in unacceptable harm to or loss of the significance or distinctive character of a Registered Historic Park and Garden or a Park and Garden identified on Local Registers (including the Hampshire Gardens Trust Register of Parks, Gardens and Green Spaces) or results in the loss or deterioration of associated designated heritage assets (in accordance with policy HE3)." |
| <b>Do you agree with how the policy will be monitored?</b>   |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation.</i> | Yes<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>   |



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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed modification](#) agreed in response to comments from Historic England (Title of the policy and the wording of Policy HE12).

|   |   |           |
|---|---|-----------|
| Local Plan Reference or document  | Policy HE13<br>Non-designated Historic Rural and Industrial Heritage Assets |           |
| Total Number of Representations received  | 3   |           |
| Number of respondents who confirmed they consider the policy is –   | <b>Yes</b>  | <b>No</b> |
| Legally Compliant   | 2   | 0         |
| Sound   | 2   | 0         |
| Complies with Duty to Cooperate   | 2   | 0         |
| <b>Summary of Representations</b><br><br>Policy is well thought out.  |   |           |
| <b>Representation Numbers</b> (Statutory consultees in bold and named)<br><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)<br>ANON-AQTS-3BSY-T/88/HE13<br><b>ANON-AQTS-3BFT-8 - Crawley Parish Council/7/HE13</b> |   |           |
| <b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• None</li> </ul>  |   |           |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE13   |
| <b>Name of respondent (or client)</b>   | Guy Robinson   |
| <b>Personal reference number</b>  | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>  |  |
| <b>Legally compliant?</b>   |  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  |  |
| <b>Policy/Document comment</b>  |  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  |  |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a> |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE13   |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/88/HE13                           |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i> | No   |

|   |  |
|---|--|
| <b>Policy/Evidence base document</b>  | HE13   |
| <b>Name of respondent (or client)</b>   | Henrietta Boucher  |
| <b>Personal reference number</b>  | ANON-AQTS-3BFT-8 - Crawley Parish Council  |
| <b>Full reference number</b>  | ANON-AQTS-3BFT-8 - Crawley Parish Council/7/HE13   |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | n/a - I don't want to respond to this question, the web site would not let me go back to the main page. Please disregard my answers on this policy |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session   |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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 HE14<br>Improvements or Alterations to Improve the Energy Efficiency of Historic Assets |           |  |
| Total Number of Representations received   | 4  |           |  |
| Number of respondents who confirmed they consider the policy is –  | <b>Yes</b>   | <b>No</b> |  |
| Legally Compliant  | 3  | 0         |  |
| Sound  | 1  | 2         |  |
| Complies with Duty to Cooperate  | 3  | 0         |  |
| <p><b>Summary of Representations</b></p> <p>A key issue is ensuring that conservation rules do not hinder necessary upgrades and retrofitting, the policy should be in line with climate emergency goals, promoting modifications that lead to energy efficiency and Net Carbon Zero achievements. Clarity is needed on the intended functions of these heritage assets to better support modernisation efforts focused on energy efficiency. This is a need for clearer terminology and guidance in policies related to heritage buildings.</p> |  |           |  |
| <p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/47/HE14</p> <p><b>ANON-AQTS-32U8-B - Historic England/2/HE14</b></p> <p><b>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/11/HE14</b></p> <p><b>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/11/HE14</b></p>   |  |           |  |
| <p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Challenge of the requirement to achieve a balance between historical preservation and environmental sustainability; and</li> <li>• Need for policy clarity to enable consistent implementation.</li> </ul>   |  |           |  |



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|---|--|
| <b>Policy/Evidence base document</b>  | HE14   |
| <b>Name of respondent (or client)</b>   | Rob Edgecock                                       |
| <b>Personal reference number</b>  | ANON-AQTS-3BSY-T                                   |
| <b>Full reference number</b>  | ANON-AQTS-3BSY-T/47/HE14                           |
| <b>Legally compliant?</b>   | Yes  |
| <b>Sound?</b>   | Yes  |
| <b>Complies with duty to co-operate?</b>  | Yes  |
| <b>Policy/Document comment</b>  | The policy is well thought-out.                    |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>  |  |
| <b>What is your suggested wording or text for the policy?</b>   |  |
| <b>Do you agree with how the policy will be monitored?</b>  |  |
| <b>If no, please explain</b>  |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>  | No, I don't want to take part in a hearing session |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has 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   |

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| <b>Policy/Evidence base document</b>   | HE14   |
| <b>Name of respondent (or client)</b>  | Guy Robinson   |
| <b>Personal reference number</b>   | ANON-AQTS-32U8-B - Historic England  |
| <b>Full reference number</b>   | ANON-AQTS-32U8-B - Historic England/2/HE14   |
| <b>Legally compliant?</b>  | Yes  |
| <b>Sound?</b>  | No   |
| <b>Complies with duty to co-operate?</b>   | Yes  |
| <b>Policy/Document comment</b>   | Aside from the typo in “alternations”, we believe criterion i merits editing to clarify the importance of understanding how the building was intended to function. We welcome the Council’s guidance document to making your historic building more energy efficient. The current wording of this policy does not fully align with this approach and thus undermines its effectiveness.  |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b>   |  |
| <b>What is your suggested wording or text for the policy?</b>  | “Any improvements or alternations that are designed to improve the energy efficiency of designated and non-designated historic assets will be supported providing that it can be clearly demonstrated that:<br>i. The proposals represent an appropriate strategy for the individual historic building, based on a whole building approach that takes account of the building’s fabric and location, as well as the needs of its occupants. Proposals should conserve or enhance key features of special interest where possible, and minimise and justify unavoidable harm an appropriate assessment and they meet the requirements of the NPPF in terms of assessing the significance of harm to the heritage asset; and |
| <b>Do you agree with how the policy will be monitored?</b>   |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate   |
| <b>Have you submitted supporting information?</b><br><i>All relevant information related to the specific policy or allocation has already been included in the representation.</i> | Yes<br><a href="#">Letter (commenting on policies)</a><br><a href="#">Email correspondence (between officers and Historic England)</a><br><a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>   |

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

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| <b>Policy/Evidence base document</b>   | HE14  |
| <b>Name of respondent (or client)</b>  | Hampshire Hospitals NHS Foundation Trust  |
| <b>Personal reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust   |
| <b>Full reference number</b>   | ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/11/HE14   |
| <b>Legally compliant?</b>  | Yes   |
| <b>Sound?</b>  | No  |
| <b>Complies with duty to co-operate?</b>   | Yes   |
| <b>Policy/Document comment</b>   | <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> | Amend to reflect the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations and keeping historic assets in continuous use.   |
| <b>What is your suggested wording or text for the policy?</b>                            | -   |
| <b>Do you agree with how the policy will be monitored?</b>                               |   |
| <b>If no, please explain</b>   |   |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   | Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate  |
| <b>Have you submitted supporting information?</b>  | No  |

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

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| <b>Policy/Evidence base document</b>   | HE14   |
| <b>Name of respondent (or client)</b>  | Shirlene Oh  |
| <b>Personal reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust  |
| <b>Full reference number</b>   | BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/11/HE14  |
| <b>Legally compliant?</b>  |  |
| <b>Sound?</b>  |  |
| <b>Complies with duty to co-operate?</b>   |  |
| <b>Policy/Document comment</b>   | <p>Full response on website<br/> Strategic Policy HE1 HE2 HE8 HE9 HE14</p> <p>The Trust supports the aspiration for a 'positive Policy' when dealing with heritage assets, but subject to such Policy recognising that such assets must 'make a practical contribution' by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or buildings of historic interest. The Trust remain concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High-Tech infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation.</p> <p>The Trust reiterates its Reg 18 position that that certain historic and socially important continuous building uses be considered 'flexible and adaptable' as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust objects to the policy as worded as it expects that 'sustainable future use' must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations.</p> |
| <b>What modification(s) are necessary to make the policy legally compliant or sound?</b> |  |
| <b>What is your suggested wording or text for the policy?</b>                            |  |
| <b>Do you agree with how the policy will be monitored?</b>                               |  |
| <b>If no, please explain</b>   |  |
| <b>Do you want to participate in hearing sessions for this policy?</b>                   |  |

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| <p><b>Have you submitted supporting information?</b><br/><i>All relevant information related to the specific policy or allocation has 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<br/><a href="#">Letter (Commenting on policies)</a></p> |
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**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed modifications](#) agreed to Title of the Policy and criterion i in response to comments from Historic England.