

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

Vibrant Economy

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 E1 Vibrant Economy	
Total Number of Representations received	9	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	1
Sound	2	4
Complies with Duty to Cooperate	5	1
<p>Summary of Representations Respondents have expressed that while the policy supports modernisation, it lacks sufficient recognition of the education, healthcare, retail, and leisure sectors that play a vital role in the local economy.</p> <p>There is a call for greater flexibility in reusing developed sites by expanding the range of employment uses, particularly at sites like Solent Business Park. The policy is critiqued for not explicitly supporting the redevelopment of existing employment sites, which could enhance economic adaptability.</p> <p>There is a consensus for policy amendments to include diverse employment sources beyond traditional industrial roles.</p> <p>Respondents point to the need to reassess traffic and infrastructure provisions related to development projects, especially around key road network junctions, to prevent potential overcrowding.</p> <p>Overall, there is strong advocacy for a broader and more flexible policy framework that reflects the dynamic and diverse economic landscape.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-32U8-B/Historic England (this representation does not have a full rep number because it was not directly entered into Citizenspace) ANON-AQTS-3BSY-T/29/E1 ANON-AQTS-3BPH-6/3/E1 ANON-AQTS-3298-F/5/E1 ANON-AQTS-32G3-R/3/E1 ANON-AQTS-32NR-X/5/E1 ANON-AQTS-32MQ-V/3/E1 BHLF-AQTS-32QF-N - National Highways/2/E1 BHLF-AQTS-32QY-8/3/E1</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> Policy does not sufficiently recognise the education, healthcare, retail, and leisure sectors that play a vital role in the local economy; 		

- Policy should be more flexible in reusing developed sites by expanding the range of employment uses, particularly at sites like Solent Business Park;
- Policy should provide more explicit support for the redevelopment of existing employment sites;
- A need to reassess traffic and infrastructure provisions related to development projects, especially around key road network junctions, to prevent potential overcrowding; and
- Strong support for a broader and more flexible policy framework that reflects the dynamic and diverse economic landscape.

Policy/Evidence base document	E1
Name of respondent (or client)	Guy Robinson
Personal reference number	ANON-AQTS-32U8-B - Historic England
Full reference number	
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	I would have expected to see reference to the historic environment in these paragraphs, especially in Winchester. Might a suitable reference be added? We note this is picked up later in paragraph 10.75.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies) Email correspondence (between officers and Historic England) Email correspondence (between officers and Historic England re: suggested changes)

Policy/Evidence base document	E1
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/29/E1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E1
Name of respondent (or client)	ReAssure Limited c/o Legal & General Real Assets
Personal reference number	ANON-AQTS-3BPH-6
Full reference number	ANON-AQTS-3BPH-6/3/E1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Our client generally supports the approach to encouraging economic growth within the policy.</p> <p>In our client's previous representations to the Regulation 18 Consultation, we recommended that the policy be amended to include explicit support for the redevelopment of existing employment sites / premises for employment use.</p> <p>Whilst we note that this recommendation has not been taken forward, we note that the policy has been amended to refer to 'modernisation'. Whilst we support this inclusion, this does not entirely address the matter made in our client's representations, namely that the reference to the 'retention of appropriate premises and sites', could be interpreted as requiring the retention of outdated employment premises and preventing their redevelopment for modern employment premises.</p> <p>Whilst our client therefore welcomes the inclusion of 'modernisation', this does not provide explicit support for redevelopment of existing employment sites / premises for employment uses. The term 'modernisation' itself suggests a refurbishment to modernise existing premises, rather than support for redevelopment.</p> <p>We therefore maintain our previous position and recommend that the policy be amended to include explicit support for the redevelopment of existing employment sites / premises for employment use.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	

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

Policy/Evidence base document	E1
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/5/E1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Hargreaves supports Strategic Policy E1 in so far that it recognises the contribution of employment policies outside of traditional industrial use classes.</p> <p>Whilst supporting overall the Council's wish to retain, regenerate and modernise appropriate premises, the inclusion of 'appropriate' is extremely important to ensure sufficient flexibility to adapt previously developed sites to accommodate a range of employment generating opportunities on brownfield sites. However, OBJECTION is raised to Strategic Policy E1 in so far that the role played by retail and leisure job opportunities is not expressly recognised, particularly as the Employment Study (2024) identifies retail as being the largest source of employment at 14,800 jobs or 16.7%.</p> <p>Currently, it is considered the policy is not justified.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Add reference to other significant sources of employment supply, including retail and leisure.
What is your suggested wording or text for the policy?	<i>Amend paragraph 3 which refers to the contribution of employment opportunities outside traditional industrial use classes. Extract is as below: The plan recognises the contribution to the local economy of employment opportunities outside of traditional industrial use classes. Existing strengths in education and creative sectors, retail, leisure, the visitor and tourism economy, including food and drink and entertainment will be encouraged especially where it can be demonstrated that they will create footfall and assist with the night-time economy within town centres</i>
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies)</p>
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Policy/Evidence base document	E1
Name of respondent (or client)	KW Forum Limited
Personal reference number	ANON-AQTS-32G3-R
Full reference number	ANON-AQTS-32G3-R/3/E1
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	No
Policy/Document comment	<p>Kennedy Wilson responded to the Regulation 18 draft Local Plan consultation. The representation broadly supported draft Policy E1 but sought to greater clarity on the types of uses that would be supported. Our suggestions have not been adopted into the Regulation 19 version of the draft Local Plan.</p> <p>The response received indicates that our suggestion to specifically identify the use classes of development being sought is not necessary and is overly restrictive. We understand the Council is seeking flexibility in its approach.</p> <p>Para 10.4 of the draft Local Plan states: “The effect of recent events are still evolving and there are likely to be further changes to the economy of the country and locally, which are as yet unknown. With this background, it is vitally important that Local Plan policies are flexible to allow for the changes that may occur and support a green and robust economy.”</p> <p>Para 10.22 goes on to state: “Uncertainty over the forecast scenarios and continuing economic structural changes all emphasise the need for flexibility regarding the specific make up of employment land between particular use classes.”</p> <p>We note also that Para. 10.31 and the text of Policy E1 specifically support home working and the creation of live work units. This both acknowledges that demand for office space is diminishing, and serves to further reduce demand for traditional offices.</p> <p>We agree with the sentiment of the above paragraphs 10.4 and 10.22, but ask that they apply the flexible approach to Solent Business Park – see draft allocation SH4. The policy and sub-text are seeking to promote a wide range of employment opportunities and indicates how the various employment sites can contribute to meeting the demand.</p>

At Para. 10.44 it states that there is opportunity for 11,000 sqm of floorspace within the 4 ha area, and it is noted that this is specifically for a range of high technology and business use within Use Class E(g). Per the representations we submitted for Regulation 18 and 19, we consider that the range of uses allowed at the Site should be broader to include B2 and B8, employment generating Sui Generis uses, and other employment generating uses which are either ancillary to the above, or which generate good quality jobs that meet the objective of draft Policy E1 and Policy E5.

We can see no evidence to indicate why Solent Business Park should be so narrowly restricted in terms of uses it can contain. Instead, there is clear evidence to the contrary, indicating a wider range of uses should be supported here in order to bring forward land for development and create jobs.

In recent years the Site had a planning permission granted which allowed for a range of employment generating uses, the Council accepted the evidence at the time that such an approach was justified. Though the permission has lapsed, it is a clear indicator that an alternative approach to the Site is needed.

In summer 2023 we discussed with officers the need for a mixed-use approach at the Site, explaining that demand for space is not from offices, but a wider range of occupiers including B2, B8 and other employment generating uses including health care, self storage, retail and education. Keeping the allocation as only for E(g) and not for other employment generating uses and ancillary uses to support the sustainability of the Site will prevent development coming forward as it is missing the opportunity to capture the demand that exists.

We submit a report by Icenii dated July 2023 (Solent Business Park Commercial and Economic Assessment which was discussed with officers during high level meetings about the Site.

We also submit a further Report titled: Solent Business Park: Winchester Local Plan Reg 19 Consultation - Employment Land Matters (October 2024 – “the October 24 Report”). This responds to the Council’s recently published employment land evidence base (July 2024).

We request that the flexibility the Council refers to in the above paragraphs is applied to the Site Allocation – SH4, and as referenced in the sub-text to E1 (and elsewhere in the plan). Policy E5 should also acknowledge that “other employment uses” could be acceptable on the employment land allocations, including Solent Business Park.

The two documents from Icenii point to the need for flexibility in the approach taken at Solent Business Park in order to encourage the delivery of employment generating uses. Demand for offices at the Site is diminishing, and the active interest in the land comes from other sectors, so far not supported by the existing

	<p>or draft Policy SH4. For draft Policy SH4 we have suggested alternative wording which we suggest would help to bring forward employment generating use at the Site.</p> <p>We will submit further evidence to support our position to the next stage of the Local Plan if required.</p> <p>We welcome discussion with the Council on these points at the earliest opportunity.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (covering letter) Supporting information (Employment Land matters) Supporting documents (comments on policies)</p>

Policy/Evidence base document	E1
Name of respondent (or client)	Ed Flood (Agent on behalf of Sparsholt College)
Personal reference number	ANON-AQTS-32NR-X
Full reference number	ANON-AQTS-32NR-X/5/E1
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is welcomed that this policy recognises the contribution to the local economy of employment opportunities outside of traditional industrial use classes;</p> <p>"The district has particular strengths in the education sector, with the Universities of Winchester and Southampton having campuses within Winchester Town, alongside further education opportunities provided at Peter Symonds College and the specialist Sparsholt College"</p> <p>The College welcomes support for the continued growth of Sparsholt College and anticipated that this will be reflected in positive planning engagement and decisions moving forward.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

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

Policy/Evidence base document	E1
Name of respondent (or client)	Union4 Planning Ltd
Personal reference number	ANON-AQTS-32MQ-V
Full reference number	ANON-AQTS-32MQ-V/3/E1
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	While recognising the contribution to the local economy of employment opportunities outside of traditional industrial use classes, it fails to reference education, healthcare and other service sectors which are significant sources of investment in the local economy and employment and should be recognised in the wording of the policy. These are part of the economic activity of the district referenced in the evidence base and without reference to them the policy is not effective or sound.
What modification(s) are necessary to make the policy legally compliant or sound?	Add reference to education, healthcare and the service sector as an important part of the local economy.
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	E1
Name of respondent (or client)	Patrick Blake
Personal reference number	BHLF-AQTS-32QF-N - National Highways
Full reference number	BHLF-AQTS-32QF-N - National Highways/2/E1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Having reviewed policies E1-E11 and the subsequent employment allocation policies, we note that there are no 'new' employment sites that will likely directly impact the SRN. The Winnall allocation is adjacent to both M3 J9 and the A34, however this is an existing site and the policy is for it to remain. Notwithstanding this, we need to carefully consider the traffic impact that may arise from the employment allocations proposed and this will feed into the Strategic Transport Assessment.</p> <p>It should be ensured that any application for significant amounts of new employment floorspace or residential dwellings, whether on new sites or expansions to existing sites, includes a comprehensive assessment of the impact of the proposals on the road network and where close to a SRN junction, includes full turning movements. Junction capacity assessments may be required for proposals which place a large number of development trips through SRN junctions.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information?	No

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

Policy/Evidence base document	E1
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/3/E1
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Harding Holding supports the aims and ambitions of WCC in their support of economic development and diversification. The policy recognises the importance of economic growth for the city and district
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (Commenting on policies and evidence base) Supporting information (Map)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E2 Spatial Distribution of Economic Growth	
Total Number of Representations received	4	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	1
Sound	2	1
Complies with Duty to Cooperate	3	0
<p>Summary of Representations Should be greater flexibility to adapt to evolving economic and environmental needs, especially in sectors such as warehousing and logistics.</p> <p>There should be an updated review to enhance flexibility, allowing for adaptive planning models like those in Winnall.</p> <p>Some respondents raised concerns about the prioritisation of housing over employment in locations like Sir John Moore Barracks.</p> <p>Economic growth considerations require new allocations to meet employment demands, as existing policies may not support future economic needs thoroughly. Some respondents raised concerns about the strategic approach of carrying forward undelivered allocations without considering needed alternatives.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/41/E2 ANON-AQTS-3298-F/6/E2 ANON-AQTS-32F2-P/2/E2 BHLF-AQTS-328V-C/3/E2</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Policies should be more flexible regarding uses; • Re-consider the balance of housing and employment at Sir John Moore Barracks; • Additional allocations are required to meet employment demands; and • Undelivered allocations should be re-assessed. 		

Policy/Evidence base document	E2
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/41/E2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E2
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/6/E2
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Hargreaves does not object to Strategic Policy E2. Paragraph 10.38 is supported, which seeks to retain B2/B8 employment uses within the core area of Sub area 1 but permits more flexibility elsewhere within Winnall.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	E2
Name of respondent (or client)	Three Maid LLP
Personal reference number	ANON-AQTS-32F2-P
Full reference number	ANON-AQTS-32F2-P/2/E2
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is vital that the requirement for employment development to help support a vibrant local economy is addressed within the plan. This is emphasised by paragraph 20 of the Framework which states that strategic policies should make sufficient provision for employment along with other needs (including housing). In combination with a focus on green energy and the need to de-carbonise the economy, the plan confirms that 'it is vitally important that Local Plan policies are flexible to allow for the changes that may occur and support a green and robust economy' (para 10.5).</p> <p>Previous versions of the plan used an employment land study undertaken in April 2020. Alongside the Regulation 19 plan the Council published an Employment Land Study (ELS) (July 2024) carried out by Lambert Smith Hampton (LSH). We welcome this update, which represents a clear and updated picture and allows the Council to base the plan on the most up to date evidence.</p> <p>The ELS considers a number of forecast based scenarios to consider the employment needs over the plan period. For industrial land (Use Class B2/B8), the conclusions are based on the average of the forecasted scenarios, which the Council and LSH consider to provide the most robust demand forecast for forecasting future employment needs. The report also takes into account the completions trend which the Council and LSH also consider to provide a robust basis for future industrial land requirements.</p> <p>In our view completions data is not a reasonable or robust basis upon which to consider future need and does not represent a justified approach to plan making in accordance with the Framework. Completions data does not take into account actual need and is reflective of a land use which has been constrained by previous local plan policies.</p> <p>Of particular note, the conclusions that the demand for warehouse and logistics space is predominantly focussed at the smaller end of the B8 market is not reflective of the demand from operators within the market. The past evidence / trend of small units is a result of that being all that has been released through the plan</p>

	<p>making process. In essence the adopted Local Plan has constrained supply and has not provided sufficient flexibility to accommodate changes within the market.</p> <p>The conclusions of the ELS are that there is a total overall need of between 27.6ha – 38.9 ha of employment land but that there is a supply of 50ha which exceeds the need. This is based wholly upon an approach of re-confirming the existing development plan allocations. For employment these are Bushfield Camp (Policy W5) and Winnall (Policy W6) as well as employment provision within the allocation at St. John Moore Barracks (Policy W2) and the ongoing development of the urban extension at Kings Barton (Policy W1). However, any provision will be part of and ancillary to the main residential uses of both sites. In addition, no consideration has been given to whether these sites are actually deliverable owing to the fact they remained a carried over local plan allocation. The plan makes no reference nor considers the importance of economic growth in the rural proportion of the District to the overall economy of the area.</p> <p>Similarly, the proposed mixed use allocations in the city centre redevelopment sites at Central Winchester and Station Approach and (Policy W7 and W8 respectively) are likely to provide some employment provision, but will be more focussed on retail, leisure and office uses. Storage and distribution (B8) and industrial (B8) uses will not be acceptable in these locations.</p> <p>No new employment allocations are proposed and the Integrated Impact Assessment shows that the Council has not considered any alternatives than their approach of carrying forward existing undelivered allocations. This does not meet the requirements of the SEA/SA Regulations Schedule 2(8) which requires an “assessment of reasonable alternatives” and the identification of the “reasons for selecting the alternatives tested in the light of the others available.” In <i>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC</i> [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware “The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.”</p> <p>At present this is considered a legal failure with the plan.</p> <p>Proposed Policy E5 of the Plan confirms that employment development will be supported within the defined settlement boundaries. In the absence of additional confirmed allocations, it is highly unlikely that this would deliver anything more than smaller scale employment as part of redevelopment of existing employment sites. We have particular concerns in relation to the allocations which are set out within our letter.</p>
<p>What modification(s) are necessary to make the</p>	<p>New allocations are required to meet the employment needs</p>

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

Policy/Evidence base document	E2
Name of respondent (or client)	Stuart Crossen
Personal reference number	BHLF-AQTS-328V-C
Full reference number	BHLF-AQTS-328V-C/3/E2
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Most sites are existing employment areas and the much of the increase in floorspace will be through higher densities. Finding new employment sites in sustainable location is difficult because of the need to protect residential amenity which is not always compatible with employment uses in particular.</p> <p>Sir John Moore Barracks is ideally suited to deliver employment due to the proximity to residential areas but also because it already has a buffer to these areas with only the centre strip of the site currently developed. Policy W2 which allocated the site for housing would sterilise an opportunity to provide sustainable employment development for the next plan period. As evidence currently exists that there will be a need the Council should consider an immediate review of a development plan in the context of the New Standard Method and make sure that allocating sites now do not compromise the opportunities for future generations to meet their own needs, which is the key to sustainable planning.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information?	Yes Letter (commenting on policies)

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E3 Town Centres Strategy and Hierarchy	
Total Number of Representations received	8	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	5	1
Sound	3	3
Complies with Duty to Cooperate	6	0
<p>Summary of Representations Support for Policy E3 in recognising the role of town centres as multi-use town places that integrate healthcare with other services.</p> <p>Concern that the policy does not sufficiently address the capacity challenges for retailers amidst evolving town centre dynamics.</p> <p>There is support for the designation of Bishop’s Waltham as a district centre that acknowledges its range of diverse services. However, there is a lack of local options for larger scale services that leads residents to travel to nearby towns like Eastleigh and Hedge End and Whiteley. Therefore, the policy needs to more effectively address local retail needs to reduce dependency on distant centres like Eastleigh, Hedge End, and Whiteley.</p> <p>Reliance on high-level reports lacking detailed local trading and market information. There is a need for more locally-based, comprehensive retail impact assessments and household surveys to inform future strategies.</p> <p>The cultural policy does not fully integrate Winchester’s cultural identity, there should be more year-round cultural infrastructure beyond seasonal events. Creative spaces should be fostered, such as art and rehearsal studios, which are essential for sustaining local cultural talent. Culture should be recognised independently rather than being combined with sports.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> ANON-AQTS-3BSH-9/1/E3 ANON-AQTS-3BSY-T/66/E3 ANON-AQTS-3298-F/8/E3 ANON-AQTS-32SJ-U/10/E3 ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/16/E3 BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/16/E3 BHLF-AQTS-32QE-M/6/E3 BHLF-AQTS-32QY-8/10/E3		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> Emphasise the role of town centres as multi-use town places that integrate healthcare with other services; 		

- More locally-based assessments needed to inform future strategies;
- Re-asses the capacity challenges for retailers in town centres;
- Addressing the local retail needs in Bishops Waltham; and
- Winchester's full cultural identity needs to be further considered in policies.

Policy/Evidence base document	E3
Name of respondent (or client)	Rebecca Galbraith
Personal reference number	ANON-AQTS-3BSH-9
Full reference number	ANON-AQTS-3BSH-9/1/E3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	I might have missed this in the reams of text but is there reference to WCCs new cultural strategy here or somewhere else in the document? Culture is not just events such as the Hat Fair, it needs the year round infrastructure of creative spaces to produce local talent. Art studios, rehearsal studios, village halls for amdram, all tie into a network of maintaining practitioners and encouraging new people to take part in the cultural identity of Winchester and surrounding areas. Culture often gets lumped into sports but it does need distinct space.
What modification(s) are necessary to make the policy legally compliant or sound?	Consideration of the cultural identity of Winchester
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

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

Policy/Evidence base document	E3
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/66/E3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E3
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/8/E3
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Hargreaves objects to Policy E3, which is not positively prepared, justified, effective or consistent with national policy.</p> <p>The policy is underpinned by the LSH Town Centre Uses studies in 2020 and 2024, which appear to be very high level, generic reports, heavily reliant on national data sources. There is an absence of trading information, household surveys and market information and only limited information provided on occupier demand and habits within the city. There is also only limited data concerning the local centres. These studies are not considered to be robust and a sound basis for informing Policy E3 or Policy E4 and the qualitative and quantitative demand for additional floorspace.</p> <p>We suggest that a retail impact assessment is undertaken, supported by household surveys, to properly understand the current trading position and retail demand information, particularly in view of the limited offer available for comparison and convenience retailers, and to consider how this will change with the significant increase in housing numbers and population forecasts within the plan period.</p> <p>As noted elsewhere within Hargreaves' representations (Policy W6 and Policy E4 specifically) in view of departures from town centre and out of centre locations, the limited space now available within the town centre and interest received from more flexible retail operators and leisure operators in the Winnall area, there is concern that capacity for both convenience and comparison shopping and leisure needs is understated.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	Further evidence to be undertaken in the form of a retail impact assessment or similar which provides more informed data to underpin policies E3 and E4.
What is your suggested wording or text for the policy?	None suggested

Do you agree with how the policy will be monitored?	None suggested
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

Policy/Evidence base document	E3
Name of respondent (or client)	Mar, Adam and Nick Welch
Personal reference number	ANON-AQTS-32SJ-U
Full reference number	ANON-AQTS-32SJ-U/10/E3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	Policy E3 : Town Centres Strategy and Hierarchy My client supports the identification of Weeke as a Local Centre in Policy E3. Paragraph 10.79 confirms that 'These centres have a variety of uses and act as important community hubs that provide the opportunity for residents to be able to shop locally for their day-to-day needs and avoid the need to travel'. The Weeke Local Centre is within 15 minute walking distance of my clients' land interests.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies and evidence base re: Land at Harestock Road)

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

Policy/Evidence base document	E3
Name of respondent (or client)	Three Maid LLP
Personal reference number	ANON-AQTS-32F2-P
Full reference number	ANON-AQTS-32F2-P/4/E3
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on Policies and Evidence Base)

Policy/Evidence base document	E3
Name of respondent (or client)	Hampshire Hospitals NHS Foundation Trust
Personal reference number	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
Full reference number	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/16/E3
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Trust continues to support the aspiration to maintain and enhance the role of centres. Healthcare uses would be more easily accessible in some cases and are potentially mutually beneficial to other uses in town centres. The Trust would be pleased to explore potential as appropriate.
What modification(s) are necessary to make the policy legally compliant or sound?	-
What is your suggested wording or text for the policy?	-
Do you agree with how the policy will be monitored?	-
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E3
Name of respondent (or client)	Shirlene Oh
Personal reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
Full reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/16/E3
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Full response on website Strategic Policy E3 E4 The Trust continues to support the aspiration to maintain and enhance the role of centres. Healthcare uses would be more easily accessible in some cases and are potentially mutually beneficial to other uses in town centres. The Trust would be pleased to explore potential as appropriate.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes Letter (Commenting on policies)</p>

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

Policy/Evidence base document	E3
Name of respondent (or client)	Ibex Homes Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QE-M
Full reference number	BHLF-AQTS-32QE-M/6/E3
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>SUPPORT</p> <p>Ibex agrees with the wording of this policy and that Bishop's Waltham is considered a District Centre. Bishop's Waltham has a number of services and independent retail outlets. It does however raise concern about there is still an outward migration for many staple supplies. There is only one single small supermarket within Bishop's Waltham that also supports outlying villages and hamlets. The next closest supermarkets are in Eastleigh, Hedge End and Whiteley.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes</p> <p>Letter (commenting on letter and proposed site)</p>

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

Policy/Evidence base document	E3
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/10/E3
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>SUPPORT</p> <p>Harding Holding agrees with the wording of this policy and that Bishop's Waltham is considered a District Centre. Bishop's Waltham has a number of services and independent retail outlets. It does however raise concern about there is still an outward migration for many staple supplies. There is only one single small supermarket within Bishop's Waltham that also supports outlying villages and hamlets. The next closest supermarkets are in Eastleigh, Hedge End and Whiteley.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes</p> <p>Letter (Commenting on policies and evidence base)</p>

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

No changes apart from:

[Proposed Modification to Local Plan policies map](#) to remove shopping frontages and identify Primary Shopping Area in Winchester Town in line with Policy E3 and Policy E7

Local Plan Reference or document	Policy E4 Main Town Centre Uses Out of Centre	
Total Number of Representations received	4	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	0
Sound	2	1
Complies with Duty to Cooperate	3	0
<p>Summary of Representations</p> <p>There is support for Policy E4’s focus on town centres as providing mutual benefits for uses. There are benefits of improved accessibility in relation to healthcare service distribution.</p> <p>Some respondents consider there needs to be greater recognition of the role of out-of-centre retail and leisure activities. They suggest reducing thresholds to foster out-of-centre developments, aiming for a balance between maintaining town centre viability and allowing diversity in development locations, especially for locations like Winnall.</p> <p>The 350 sqm threshold for out-of-centre retail and leisure proposals, is considered to be unjustified and has been established without appropriately considering scale, viability, and cumulative effects. The threshold is inconsistent with national standards that suggest a much larger threshold of 2,500 sqm. There should at least be a reversion to the previous local threshold of 1,000 sqm.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/22/E4</p> <p>ANON-AQTS-3298-F/3/E4</p> <p>ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/2/E4</p> <p>BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/2/E4</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Policy does not sufficiently recognise the role of out-of-centre retail and leisure activities; and • The proposed 350 sqm threshold for out-of-centre retail and leisure proposals, is considered to be unjustified and should either revert to the previous local threshold of 1,000 sqm, or the national threshold of 2,500 sqm. 		

Policy/Evidence base document	E4
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/22/E4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E4
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/3/E4
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Hargreaves objects to Strategic Policy E4, which is not positively prepared, justified and not consistent with national policy.</p> <p>Whilst the policy accords overall with national policy by supporting a town centre first approach, considering the lack of capacity within the town centre, low vacancy rates and Winchester City's strong performance, it is considered that a more flexible approach should be supported, and to prevent further operators seeking premises outside of Winchester, which is evidenced by major departures from the town recently. Specifically, outside of Sub area 1 in Winnall (Policy W6) where retail activity is already established, more flexible retail and leisure uses should be activity supported, if the sequential test and impact assessments have been passed.</p> <p>Of note, a number of retailers have left the city centre in recent years, including Next, Beales, River Island and Monsoon. Others, such as Debenhams, have gone into administration. Out of centre, Carpetright have left having gone into administration and Currys and Halfords have also consolidated holdings into other towns. The significant changes in the retail market and the function of the town centre are well documented and flexibility within the updated Use Classes Order has kept vacancy in the town centre low. The lack of appropriate space within the town centre means that out of centre locations, such as Winnall have a role to play.</p> <p>The Council has recently supported applications for two out of down drive through developments in the Winnall area. These are occupied by two significant food and beverage operators (MacDonalds and Greggs) which are potentially more harmful to the town centre and will divert trade more significantly than more flexible retail and leisure uses.</p> <p>It is also considered that insufficient justification has been provided within the evidence base for adopting a threshold of 350sqm for retail and leisure proposals (compared to the national threshold within the NPPF of 2,500sqm and adopted thresholds of 500 – 1000 sqm).</p>

	<p>The Planning Practice Guidance (PPG) provides guidance for setting an appropriate impact threshold. Scale, existing viability and vitality, cumulative effects of recent developments, vulnerability, town centre strategies and planned investment are set out as requiring consideration in setting the appropriate figure. However, this is absent from the Council's evidence base and has not been scrutinised in the town centre studies in 2020 or 2024.</p> <p>The Town Centre Study (2020) instead recommends this threshold because of the presence of smaller convenience format operators (such as Sainsburys Local and Tesco Express) within the marketplace, which fall below existing thresholds. There is no obvious methodology supporting this figure, which appears to be simply a catch all to prevent any retail operators from operating outside of the defined centres. However, the presence of these retailers, does not in itself justify a departure from national guidance.</p> <p>In the absence of this evidence, the previous policy requirement under Policy WT1 for Winchester Town of 1,000 sqm should be restored.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>Amendments to Policy E3 to clarify that Winnall (outside of Sub area 1) is an appropriate location for out of centre uses an an amendment to the threshold to revert to 1,000 sqm in the absence of data to support 350 sqm. Finally, it is considered that the 3rd paragraph of the main text is unnecessary, as it repeats text elsewhere and should be deleted.</p>
<p>What is your suggested wording or text for the policy?</p>	<p><i>Outside of the centres listed in Strategic Policy E3 above, proposals for new or expanded retail and other main town centre uses will be considered where they comply with the sequential test, which requires applicants to demonstrate why the proposal could not be accommodated within a town centre, or – failing that-on the edge of a town centre. <u>This includes Winnall (Policy W6), outside of Sub area 1.</u></i></p> <p><i>Where the development is for retail or leisure development, an impact assessment will also be required when the proposal is over <u>1,000sqm gross</u>.</i></p> <p><i>Shops or other town centre uses that are considered to provide a local facility or service, will generally be acceptable outside of defined centres.</i></p> <p><i>In all cases, the local planning authority will consider the requirements for town centre uses in relation to the sequential test on a case-by-case basis and applicants will be required to submit sufficient information to enable the sequential test to be appropriately assessed.</i></p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	

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

Policy/Evidence base document	E4
Name of respondent (or client)	Hampshire Hospitals NHS Foundation Trust
Personal reference number	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust
Full reference number	ANON-AQTS-32Z7-F - Hampshire Hospitals NHS Foundation Trust/2/E4
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The Trust continues to support the aspiration to maintain and enhance the role of centres. Healthcare uses would be more easily accessible in some cases and are potentially mutually beneficial to other uses in town centres. The Trust would be pleased to explore potential as appropriate.
What modification(s) are necessary to make the policy legally compliant or sound?	-
What is your suggested wording or text for the policy?	-
Do you agree with how the policy will be monitored?	-
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E4
Name of respondent (or client)	Shirlene Oh
Personal reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust
Full reference number	BHLF-AQTS-3265-9 - Hampshire Hospitals NHS Foundation Trust/2/E4
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Full response on website Strategic Policy E3 E4 The Trust continues to support the aspiration to maintain and enhance the role of centres. Healthcare uses would be more easily accessible in some cases and are potentially mutually beneficial to other uses in town centres. The Trust would be pleased to explore potential as appropriate.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	<p>Yes Letter (Commenting on policies)</p>

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E5 Enhancing Employment Opportunities	
Total Number of Representations received	5	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	4	1
Sound	1	4
Complies with Duty to Cooperate	5	0
<p>Summary of Representations</p> <p>Some respondents considered Policy E5 does not sufficiently align with other strategic policies such as Policies E1, E2, E4, and W6, particularly failing to support employment development in non-traditional use classes e.g. in areas like Winnall, or promote economic growth in rural areas.</p> <p>The definition of employment should be broadened to cover diverse economic activities, including those in academia, healthcare, and social infrastructure, A wider definition of employment uses would provide greater flexibility and adaptability.</p> <p>The updated Employment Land Study identifies constraints in accommodating demand for warehouse and logistics spaces.</p> <p>Some respondents raised concerns about relying too heavily on completion data for forecasting, which may not accurately reflect the demand for different employment spaces, such as those needed for logistics and warehousing, to better anticipate and meet future economic trends, an updated employment land study is recommended.</p> <p>There should be greater examination of the deliverability of existing employment land allocations and their alignment with community needs.</p> <p>Employment provision should be encouraged alongside housing to reflect the national framework.</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>[ANON-AQTS-3BSY-T/84/E5 ANON-AQTS-3298-F/9/E5 ANON-AQTS-32U5-8/6/E5 ANON-AQTS-32F2-P/6/E5 ANON-AQTS-32MQ-V/9/E5</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Better alignment with other strategic policies such as E1, E2, E4, and W6; 		

- Definition of employment should be broadened;
- There are constraints in accommodating demand for warehouse and logistics spaces;
- Completion data may not accurately reflect the demand for different employment spaces, such as those needed for logistics and warehousing, to better anticipate and meet future economic trends, an updated employment land study is required;
- There should be greater examination of the deliverability of existing employment land allocations and their alignment with community needs; and
- Employment provision should be encouraged alongside housing to reflect the national framework.

Policy/Evidence base document	E5
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/84/E5
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E5
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/9/E5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Hargreaves objects to Policy E5 in so far as it is inconsistent with Strategic Policies E1, E2 and E4 and Policy W6. Whilst the need to comply with the sequential approach is acknowledged, the policy should be positively worded to support proposals in the Winnall Area, where the sequential test is met. This is because of the employment generating nature of these uses and the acknowledged need to support a more flexible approach in Winnall. Currently, the policy is not fully justified or positively prepared.
What modification(s) are necessary to make the policy legally compliant or sound?	Text to be added to set out that proposals within Policy W6 will be supported where they meet the sequential test.
What is your suggested wording or text for the policy?	Uses that attract significant amounts of visitors or are primarily aimed at visiting members of the public will not generally be acceptable within industrial areas and will be directed to town centres in accordance with the sequential approach. Within Winnall (Policy W6) proposals will be supported where they meet the sequential test and are located outside the core area (Sub area 1). Office development will be restricted to sub-class E(g) in order to prevent unregulated changes to other uses within Class E that are appropriate within town centres.
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	E5
Name of respondent (or client)	Church Commissioners for England
Personal reference number	ANON-AQTS-32U5-8
Full reference number	ANON-AQTS-32U5-8/6/E5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Draft Policy E5 sets out uses that the Council considers to be employment. This includes:</p> <ul style="list-style-type: none"> i “Offices, light industrial research and development such as can be carried out within a residential area (Use Class E(g)). ii Industrial, warehousing and distribution (Classes B2-B8). iii Some Sui Generis activities where they are employment and business-led, to be determined on an individual basis.” <p>There are other types of uses that do not necessarily fall within “Sui Generis” that can also be employment or generating business led, for example academic institutions which employ a number of staff through teaching, research, business and administration roles.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	On this basis the wording of point iii) should be amended to refer to “other uses” or “other activities” rather than Sui Generis. This would allow for flexibility and still provide the Council with control to assess matters on an individual basis.
What is your suggested wording or text for the policy?	wording of point iii) should be amended to refer to “other uses” or “other activities” rather than Sui Generis
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been</i>	No

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

Policy/Evidence base document	E5
Name of respondent (or client)	Three Maid LLP
Personal reference number	ANON-AQTS-32F2-P
Full reference number	ANON-AQTS-32F2-P/6/E5
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is vital that the requirement for employment development to help support a vibrant local economy is addressed within the plan. This is emphasised by paragraph 20 of the Framework which states that strategic policies should make sufficient provision for employment along with other needs (including housing). In combination with a focus on green energy and the need to de-carbonise the economy, the plan confirms that 'it is vitally important that Local Plan policies are flexible to allow for the changes that may occur and support a green and robust economy' (para 10.5).</p> <p>Previous versions of the plan used an employment land study undertaken in April 2020. Alongside the Regulation 19 plan the Council published an Employment Land Study (ELS) (July 2024) carried out by Lambert Smith Hampton (LSH). We welcome this update, which represents a clear and updated picture and allows the Council to base the plan on the most up to date evidence.</p> <p>The ELS considers a number of forecast based scenarios to consider the employment needs over the plan period. For industrial land (Use Class B2/B8), the conclusions are based on the average of the forecasted scenarios, which the Council and LSH consider to provide the most robust demand forecast for forecasting future employment needs. The report also takes into account the completions trend which the Council and LSH also consider to provide a robust basis for future industrial land requirements.</p> <p>In our view completions data is not a reasonable or robust basis upon which to consider future need and does not represent a justified approach to plan making in accordance with the Framework. Completions data does not take into account actual need and is reflective of a land use which has been constrained by previous local plan policies.</p> <p>Of particular note, the conclusions that the demand for warehouse and logistics space is predominantly focussed at the smaller end of the B8 market is not reflective of the demand from operators within the market. The past evidence / trend of small units is a result of that being all that has been released through the plan</p>

	<p>making process. In essence the adopted Local Plan has constrained supply and has not provided sufficient flexibility to accommodate changes within the market.</p> <p>The conclusions of the ELS are that there is a total overall need of between 27.6ha – 38.9 ha of employment land but that there is a supply of 50ha which exceeds the need. This is based wholly upon an approach of re-confirming the existing development plan allocations. For employment these are Bushfield Camp (Policy W5) and Winnall (Policy W6) as well as employment provision within the allocation at St. John Moore Barracks (Policy W2) and the ongoing development of the urban extension at Kings Barton (Policy W1). However, any provision will be part of and ancillary to the main residential uses of both sites. In addition, no consideration has been given to whether these sites are actually deliverable owing to the fact they remained a carried over local plan allocation. The plan makes no reference nor considers the importance of economic growth in the rural proportion of the District to the overall economy of the area.</p> <p>Similarly, the proposed mixed use allocations in the city centre redevelopment sites at Central Winchester and Station Approach and (Policy W7 and W8 respectively) are likely to provide some employment provision, but will be more focussed on retail, leisure and office uses. Storage and distribution (B8) and industrial (B8) uses will not be acceptable in these locations.</p> <p>No new employment allocations are proposed and the Integrated Impact Assessment shows that the Council has not considered any alternatives than their approach of carrying forward existing undelivered allocations. This does not meet the requirements of the SEA/SA Regulations Schedule 2(8) which requires an “assessment of reasonable alternatives” and the identification of the “reasons for selecting the alternatives tested in the light of the others available.” In <i>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC</i> [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware “The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.”</p> <p>At present this is considered a legal failure with the plan.</p> <p>Proposed Policy E5 of the Plan confirms that employment development will be supported within the defined settlement boundaries. In the absence of additional confirmed allocations, it is highly unlikely that this would deliver anything more than smaller scale employment as part of redevelopment of existing employment sites.</p> <p>We have particular concerns in relation to the allocations which are set out within our letter.</p>
<p>What modification(s) are necessary to make the</p>	<p>More employment sites needs to be allocated</p>

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

Policy/Evidence base document	E5
Name of respondent (or client)	Union4 Planning Ltd
Personal reference number	ANON-AQTS-32MQ-V
Full reference number	ANON-AQTS-32MQ-V/9/E5
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Given that policy E1 recognises the employment value and value to the economy of activities outside the traditional employment use classes, this should also be reflected in policy E5 to provide support for development outside of the traditional use classes that benefits the local economy and employment and skills, including in healthcare and other social infrastructure.
What modification(s) are necessary to make the policy legally compliant or sound?	Add reference to the support of proposals that enhance economic activity in the healthcare and service sector.
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies)

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E6 Retaining Employment Opportunities	
Total Number of Representations received	5	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	3	1
Sound	1	4
Complies with Duty to Cooperate	4	0
<p>Summary of Representations Clearer and more justified policy wording to prevent misinterpretation, particularly in the redevelopment of outdated employment sites.</p> <p>The 12-month marketing requirement should be reduced to six months to avoid delays and unnecessary costs.</p> <p>There is a need for improved guidance on marketing and viability assessments The policy is potentially too lenient, allowing the repurposing of employment land for less economically necessary uses.</p> <p>The policy needs to better reflect local economic needs especially in specific areas like Winnall where there is a need for a tailored approach.</p>		
<p>Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/24/E6 ANON-AQTS-3BPH-6/2/E6 ANON-AQTS-3298-F/4/E6 BHLF-AQTS-326P-4/1/E6, BHLF-AQTS-328R-8 - Hampshire County Council/8/E6</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Re-word policy in respect of redevelopment of outdated employment sites; • Re-assess and potentially reduce the 12-month marketing requirement; • More guidance needed on marketing and viability assessments; • Policy should be strengthened to prevent the repurposing of employment land for less economically necessary uses; and • Tailor the policy in particular areas to better reflect local economic needs. 		

Policy/Evidence base document	E6
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/24/E6
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E6
Name of respondent (or client)	ReAssure Limited c/o Legal & General Real Assets
Personal reference number	ANON-AQTS-3BPH-6
Full reference number	ANON-AQTS-3BPH-6/2/E6
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Our client's previous representations to the Regulation 18 Consultation set out that whilst the intention of the policy is to prevent the loss of employment land and floorspace to non-employment uses, as with Policy E1 above the current wording of the policy could be interpreted as preventing the redevelopment of outdated employment sites / floorspace for modern employment premises.</p> <p>It was therefore recommended that the policy be amended to include explicit support for the redevelopment of existing employment sites / premises for employment use, or to simply set out that the policy only applies to the redevelopment of employment sites for non-employment uses.</p> <p>We note that the Council's Consultation Comments document in relation to this Policy, states that this is covered by point i) of the Policy. This is not strictly correct, as the policy still relates to the loss of existing floorspace, not redevelopment. However, our client welcomes the amendment to Policy E5 as noted in the Council's Consultation Comments document.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	See Above
What is your suggested wording or text for the policy?	See Above
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (Commenting on policies)</p>
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Policy/Evidence base document	E6
Name of respondent (or client)	Hargreaves Properties Ltd
Personal reference number	ANON-AQTS-3298-F
Full reference number	ANON-AQTS-3298-F/4/E6
Legally compliant?	Yes
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	Hargreaves objects to Policy E6, which fails to recognise the greater flexibility applied to the Winnall Area, outside of its core area. It should be clarified that a separate policy approach is supported for this area. This policy is not positively prepared or justified, nor consistent with national policy. It is separately recommended that Policy W6.ii be amended to clarify the relationship with this policy.
What modification(s) are necessary to make the policy legally compliant or sound?	Add additional text to support a more flexible approach within the Winnall area outside of the core area
What is your suggested wording or text for the policy?	Additional text to be added to the policy as follows: <i>A more flexible approach is adopted for proposals for the loss of employment use within the Winnall area, under Policy W6, and outside of the core area (Sub area 1).</i>
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on policies)

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

Policy/Evidence base document	E6
Name of respondent (or client)	Tessa Robertson
Personal reference number	BHLF-AQTS-326P-4
Full reference number	BHLF-AQTS-326P-4/1/E6
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Full response 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>The Trust welcomes the Council’s amendment of E6 iii. to read: “The potential of the site or building to be developed for a mixture of uses that include a significant amount of employment” [our emphasis]</p> <p>but we are concerned that there is one paragraph of the policy that is too weak to prevent the loss of employment uses when there is still an economic need for it to be retained.</p> <p>Paragraph 10.101 defines the intention of the policy to protect employment land in order “to support the economy of Winchester District” from competition by other more profitable uses, and makes clear that “employment uses are particularly vulnerable to redevelopment.”</p> <p>The Trust believes the wording of paragraph E6 vi. (“The benefits of the proposed use compared to the benefits of retaining the existing use”) should be deleted as it is both unclear and provides an opportunity to make an easy argument for a change to a more profitable use and the loss of employment uses. An example of this happening is the development of PBSA on the Winnall business estate.</p> <p>A better and more relevant test would be a clause along the following lines: “The land is no longer required to meet the economic development needs of the area.”</p>
What modification(s) are necessary to make the policy legally compliant or sound?	

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

Policy/Evidence base document	E6
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/8/E6
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>No – The Policy is not Justified because there is not enough evidence to justify the 12 month marketing exercise.</p> <p>The County Council support the economic prosperity and vitality of Hampshire's towns, villages and cities. There is however limited evidence that a requirement for a 12-month marketing exercise is justified and effective in retaining employment opportunities.</p> <p>Recent experience is encapsulated in the table below from a live example employment site, that has been marketed by the County Council for existing use. This identifies a spike in new enquiries during the first few months of marketing, with waning interest subsequently (and very low interest in the existing use at any point). The trend is corroborated in discussion with local agents and our experience in marketing surplus land and buildings.</p> <p>A 12-month marketing period is unlikely to be more effective in securing continued employment use than, say, a 6-month marketing period, and in fact could cause harm by delaying brownfield regeneration, also potentially adding significant holding costs to a vacant building.</p> <p>Amendments to the policy are therefore suggested to review outcomes of a more targeted marketing exercise after six months, with retained wording 'at least' to extend this period if required.</p> <p>Additional guidance on marketing requirements, the review and reporting process would be helpful as an appendix or supplementary planning document. This should include the approach to financial viability assessment, particularly regarding the City Council's key considerations when assessing the viability of maintaining the current employment use or an equivalent.</p> <p>Proposed modifications to make the policy sound: <i>'Marketing for <u>existing and employment use</u> should be undertaken for at least <u>6-12 months</u>.'</i></p>

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E7 Maintaining the Vitality and Viability of Town Centres	
Total Number of Representations received	1	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0
Summary of Representations The policy is well thought-out.		
Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/80		
Main issues raised in representations received in regulation 19 consultation None		

Policy/Evidence base document	E7
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/80/E7
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

[Proposed Modifications](#) to Policy E7 to clarify parts applicable to the Primary Shopping Areas.

[Proposed Modification](#) to Local Plan policies map is included in the Proposed Modifications to remove shopping frontages and identify Primary Shopping Areas in line with Policy E3 and Policy E7.

Local Plan Reference or document	Policy E8 Local Shops, Services and Facilities	
Total Number of Representations received	6	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	2	1
Sound	2	2
Complies with Duty to Cooperate	3	0
<p>Summary of Representations</p> <p>There is support for the pragmatic nature of the policy regarding the challenges around primary shopping areas and HGV access.</p> <p>Some respondents suggested that only non-local services and facilities and those with high needs for public access and accessibility should remain in town centres.</p> <p>The support for promoting arts and cultural amenities is welcomed.</p> <p>The 12-month marketing requirement should be reduced to six months to avoid delays and unnecessary costs.</p> <p>There is a need for improved guidance on marketing and viability assessments</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/72/E8 ANON-AQTS-32NM-S/1/E8 ANON-AQTS-32MQ-V/7/E8, BHLF-AQTS-328R-8 - Hampshire County Council/22/E8 BHLF-AQTS-32QE-M/7/E8 BHLF-AQTS-32QY-8/11/E8</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Policy to allow only non-local services and facilities and those with high needs for public access and accessibility in town centres; • Reduce the 12-month marketing requirement; and • Produce improved guidance on marketing and viability assessments. 		

Policy/Evidence base document	E8
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/72/E8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E8
Name of respondent (or client)	Tom Clarke MRTPI
Personal reference number	ANON-AQTS-32NM-S
Full reference number	ANON-AQTS-32NM-S/1/E8
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	We are supportive of this policy and the protection it affords to valued facilities in line with paragraph 97 of the NPPF (2023). We welcome that paragraph 10.131 makes clear the policy applies to arts and cultural facilities.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E8
Name of respondent (or client)	Union4 Planning Ltd
Personal reference number	ANON-AQTS-32MQ-V
Full reference number	ANON-AQTS-32MQ-V/7/E8
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>Policy E8 refers to proposals for the development of new, extended or improved facilities and services and notes that these will be supported in accordance with policies SP1 and SP2 of the Plan (though we separately note in relation to those policies that neither refer to new investment in healthcare or social infrastructure). The policy should also refer to support for new, improved, extended or replacement services, public infrastructure and facilities. these span a range of services that are essential for the health and well-being of the exiting and projected community over the life of the Plan, which will require new local and district wide facilities that serve the needs of the country for good healthcare outcomes. At present the Plan is silent on the investment needed in important social infrastructure.</p> <p>While the policy is not clear on the definition of a local function, it seeks to suggest non-local functions should be located in the town centres with reference to Policy E3. Policy E3 however, refers to the main town centre uses that drive footfall and vibrancy. This is not inclusive of local services, such as some healthcare and other social services that are not primarily serving visiting members of the public where high levels of accessibility are required. Within the town centres, the main town centre uses of retail, office, indoor leisure uses, are supported by Policy E3, along with similar uses that are aimed primarily at visiting members of the public and add to the vibrancy and attractiveness of centres.</p> <p>Hence Policy E8 should be amended to restrict only non-local services that are primarily for large number of visiting members of the public to town centres. It should be amended to read ‘.... Within settlements, facilities and services that serve visiting members of the public where high levels of accessibility are required and do not serve a local function should be located within the centres in accordance with Strategic Policy E3 above. Other services that do not require high levels of accessibility should be located within the main urban areas....’</p> <p>While the policy seek to resist the loss of sites used for local services to other non-service uses, the policy should make clear that the reuse of buildings or sites, including redevelopment where appropriate, that have previously been used for services for other local services is supported.</p>

<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>‘..... Within settlements, facilities and services that serve visiting members of the public where high levels of accessibility are required and do not serve a local function should be located within the centres in accordance with Strategic Policy E3 above. Other services that do not require high levels of accessibility should be located within the main urban areas....’</p> <p>While the policy seek to resist the loss of sites used for local services to other non-service uses, the policy should make clear that the reuse of buildings or sites, including redevelopment where appropriate, that have previously been used for services for other local services is supported.</p>
<p>What is your suggested wording or text for the policy?</p>	<p><i>‘..... Within settlements, facilities and services that serve visiting members of the public where high levels of accessibility are required and do not serve a local function should be located within the centres in accordance with Strategic Policy E3 above. Other services that do not require high levels of accessibility should be located within the main urban areas....’</i></p> <p>While the policy seek to resist the loss of sites used for local services to other non-service uses, the policy should make clear that the reuse of buildings or sites, including redevelopment where appropriate, that have previously been used for services for other local services is supported.</p>
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies)</p>

Policy/Evidence base document	E8
Name of respondent (or client)	Neil Massie
Personal reference number	BHLF-AQTS-328R-8 - Hampshire County Council
Full reference number	BHLF-AQTS-328R-8 - Hampshire County Council/22/E8
Legally compliant?	
Sound?	No
Complies with duty to co-operate?	
Policy/Document comment	<p>No - The Policy is not Justified and effective because there is not enough evidence to justify the 12 month marketing exercise.</p> <p>There is limited evidence that a requirement for a 12-month marketing exercise is justified and effective in retaining community buildings.</p> <p>In comparison, the Community Right to Bid for Assets of Community Value allows for a 6-month period for community organisations to prepare bids to purchase the asset.</p> <p>Evidence presented by the County Council in respect of Policy E6 also highlights an initial surge in enquiries in the first few months of marketing, with a sustained fall in new enquiries subsequently, consistent with the County Council's experience in marketing surplus land and buildings.</p> <p>A 12-month marketing period is unlikely to be more effective in securing continued community use than, say, a 6-month marketing period, and in fact could cause harm by delaying re-use of buildings, also potentially adding significant holding costs to a vacant building.</p> <p>The County Council recognise that Policy E8 covers a broad range of local shops, services and facilities. Amendments to the policy are therefore suggested to review outcomes of a more targeted marketing exercise after six months, with retained wording 'at least' to extend this period if required. Additional guidance on marketing requirements, the review and reporting process would be helpful as an appendix or supplementary planning document. This should include the approach to financial viability assessment, particularly regarding the City Council's key considerations when assessing the viability of maintaining the existing use or an equivalent.</p> <p>Proposed modifications to make the policy sound: <i>'Marketing should be undertaken for a minimum of at least <u>6-12</u> months for <u>existing</u></i></p>

	<i><u>use and alternative uses falling within the definition of local shops, services and facilities.'</u></i>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <u>Letter (commenting on policies and evidence base)</u>

Policy/Evidence base document	E8
Name of respondent (or client)	Ibex Homes Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QE-M
Full reference number	BHLF-AQTS-32QE-M/7/E8
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Ibex supports Winchesters approach to new development within the Countryside where there is an identified need (criterion i) and that there are no other suitable alternatives. This is a pragmatic approach to supporting the local economy where the principal shopping areas are heavily constrained and the modern need for retail and services requires a different approach, including sufficient dedicated car parking, and HGV access for re-supply.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (commenting on letter and proposed site)

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

Policy/Evidence base document	E8
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/11/E8
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Harding Holding supports Winchester's approach to new development within the Countryside where there is an identified need (criterion i) and that there are no other suitable alternatives. This is a pragmatic approach to supporting the local economy where the principal shopping areas are heavily constrained and the modern need for retail and services requires a different approach, including sufficient dedicated car parking, and HGV access for re-supply.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes Letter (Commenting on policies and evidence base)

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E9 Economic Development in the Rural Area	
Total Number of Representations received	2	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	1
Sound	1	1
Complies with Duty to Cooperate	2	0
<p>Summary of Representations</p> <p>There were two responses to this policy which highlighted the importance of balancing employment land allocation with the actual market demand, pointing out the risk of basing decisions on outdated studies.</p> <p>There is a need for flexibility in local plans to align with market changes, particularly in logistics and green energy sectors.</p> <p>There was some concern over rural economic growth being overlooked</p>		
<p>Representation Numbers (Statutory consultees in bold and named)</p> <p>ANON-AQTS-3BSY-T/95/E9</p> <p>ANON-AQTS-32F2-P/7/E9</p>		
<p>Main issues raised in representations received in regulation 19 consultation</p> <ul style="list-style-type: none"> • Plan should be flexible, particularly in logistics and green energy sectors • Need more up-to-date studies. 		

Policy/Evidence base document	E9
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/95/E9
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	E9
Name of respondent (or client)	Three Maid LLP
Personal reference number	ANON-AQTS-32F2-P
Full reference number	ANON-AQTS-32F2-P/7/E9
Legally compliant?	No
Sound?	No
Complies with duty to co-operate?	Yes
Policy/Document comment	<p>It is vital that the requirement for employment development to help support a vibrant local economy is addressed within the plan. This is emphasised by paragraph 20 of the Framework which states that strategic policies should make sufficient provision for employment along with other needs (including housing). In combination with a focus on green energy and the need to de-carbonise the economy, the plan confirms that 'it is vitally important that Local Plan policies are flexible to allow for the changes that may occur and support a green and robust economy' (para 10.5).</p> <p>Previous versions of the plan used an employment land study undertaken in April 2020. Alongside the Regulation 19 plan the Council published an Employment Land Study (ELS) (July 2024) carried out by Lambert Smith Hampton (LSH). We welcome this update, which represents a clear and updated picture and allows the Council to base the plan on the most up to date evidence.</p> <p>The ELS considers a number of forecast based scenarios to consider the employment needs over the plan period. For industrial land (Use Class B2/B8), the conclusions are based on the average of the forecasted scenarios, which the Council and LSH consider to provide the most robust demand forecast for forecasting future employment needs. The report also takes into account the completions trend which the Council and LSH also consider to provide a robust basis for future industrial land requirements.</p> <p>In our view completions data is not a reasonable or robust basis upon which to consider future need and does not represent a justified approach to plan making in accordance with the Framework. Completions data does not take into account actual need and is reflective of a land use which has been constrained by previous local plan policies.</p> <p>Of particular note, the conclusions that the demand for warehouse and logistics space is predominantly focussed at the smaller end of the B8 market is not reflective of the demand from operators within the market. The past evidence / trend of small units is a result of that being all that has been released through the plan</p>

	<p>making process. In essence the adopted Local Plan has constrained supply and has not provided sufficient flexibility to accommodate changes within the market.</p> <p>The conclusions of the ELS are that there is a total overall need of between 27.6ha – 38.9 ha of employment land but that there is a supply of 50ha which exceeds the need. This is based wholly upon an approach of re-confirming the existing development plan allocations. For employment these are Bushfield Camp (Policy W5) and Winnall (Policy W6) as well as employment provision within the allocation at St. John Moore Barracks (Policy W2) and the ongoing development of the urban extension at Kings Barton (Policy W1). However, any provision will be part of and ancillary to the main residential uses of both sites. In addition, no consideration has been given to whether these sites are actually deliverable owing to the fact they remained a carried over local plan allocation. The plan makes no reference nor considers the importance of economic growth in the rural proportion of the District to the overall economy of the area.</p> <p>Similarly, the proposed mixed use allocations in the city centre redevelopment sites at Central Winchester and Station Approach and (Policy W7 and W8 respectively) are likely to provide some employment provision, but will be more focussed on retail, leisure and office uses. Storage and distribution (B8) and industrial (B8) uses will not be acceptable in these locations.</p> <p>No new employment allocations are proposed and the Integrated Impact Assessment shows that the Council has not considered any alternatives than their approach of carrying forward existing undelivered allocations. This does not meet the requirements of the SEA/SA Regulations Schedule 2(8) which requires an “assessment of reasonable alternatives” and the identification of the “reasons for selecting the alternatives tested in the light of the others available.” In <i>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC</i> [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware “The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.”</p> <p>At present this is considered a legal failure with the plan.</p> <p>Proposed Policy E5 of the Plan confirms that employment development will be supported within the defined settlement boundaries. In the absence of additional confirmed allocations, it is highly unlikely that this would deliver anything more than smaller scale employment as part of redevelopment of existing employment sites. We have particular concerns in relation to the allocations which are set out within our letter.</p>
<p>What modification(s) are necessary to make the</p>	<p>More employment sites should be allocated</p>

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

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E10 Farm Diversification	
Total Number of Representations received	1	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0
Summary of Representations General support for the policy.		
Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/51/E10		
Main issues raised in representations received in regulation 19 consultation None		

Policy/Evidence base document	E10
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/51/E10
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.

Local Plan Reference or document	Policy E11 Visitor-Related Development Within the Countryside	
Total Number of Representations received	1	
Number of respondents who confirmed they consider the policy is –	Yes	No
Legally Compliant	1	0
Sound	1	0
Complies with Duty to Cooperate	1	0
Summary of Representations The response provided general support for the policy, whilst stressing that requiring overly detailed plans can result in delays in developments.		
Representation Numbers (Statutory consultees in bold and named) ANON-AQTS-3BSY-T/55/E11		
Main issues raised in representations received in regulation 19 consultation None		

Policy/Evidence base document	E11
Name of respondent (or client)	Rob Edgecock
Personal reference number	ANON-AQTS-3BSY-T
Full reference number	ANON-AQTS-3BSY-T/55/E11
Legally compliant?	Yes
Sound?	Yes
Complies with duty to co-operate?	Yes
Policy/Document comment	The policy is well thought-out.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	No, I don't want to take part in a hearing session
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

WCC Response.

Comments noted.

WCC Recommended Changes arising from representations:

None.