

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

### Kings Worthy Allocations

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 KW1 Cornerways & Merrydale	
Total Number of Representations received	5	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	3	0
Sound	2	1
Complies with Duty to Cooperate	3	0
<b>Summary of Representations</b> Most representations on this policy are supportive, including of new criteria added following the draft Local Plan. One comment suggests a need for a general housing allocation in Kings Worthy (as opposed to older persons’ housing) and another highlights the possible impact on educational provision.		
<b>Representation Numbers</b> (Statutory consultees in bold and named) <b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)  <b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/23/KW1</b> ANON-AQTS-32TT-6/3/KW1 <b>ANON-AQTS-327U-A - Southern Water/27/KW1</b> <b>BHLF-AQTS-328R-8 - Hampshire County Council/19/KW1</b> BHLF-AQTS-3267-B/9/KW1		
<b>Main issues raised in representations received in regulation 19 consultation</b> <ul style="list-style-type: none"> <li>• General support for policy KW1.</li> </ul>		

<b>Policy/Evidence base document</b>	KW1
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Might reference be usefully made to the Kings Worthy Conservation Area Technical Assessment?
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<b>Policy/Evidence base document</b>	KW1
--------------------------------------	-----

<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/9/KW1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Response: Support - The site is in a sustainable location and was previously used as a care facility. The site constitutes PDL, and the allocation is supported by BSP. - The site cannot contribute in a numerical sense to meeting the identified housing needs if the redevelopment yields the same number of dwellings, it will only be net additions that can reasonably contribute to the identified housing needs. - Any net additions through redevelopment are likely to result in an increased density and this will need considering carefully given proximity of existing medium to low density residential form.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Form (referring to letter)</a> <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	KW1
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/23/KW1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The ICB supports the current policy statements.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	KW1
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/19/KW1
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	45 dwellings is likely to generate up to 14 primary age pupils and 9 secondary. The site is served by Kings Worthy Primary and Henry Beaufort secondary. Kings Worthy Primary School is forecasted to be at, or close to its capacity. Henry Beaufort will be under pressure from developments at Barton Farm and Sir John Moore Barracks. In order to accommodate the additional number of children forecast from these new homes developer contributions towards both primary and secondary provision may be required.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

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

<b>Policy/Evidence base document</b>	KW1
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/27/KW1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>We welcome the inclusion of the criterion below for Policy KW1 Cornerways:  Ensure that the groundwater Source Protection Zone is protected  Supporting Text:  Our assessment revealed that this site lies within groundwater Source Protection Zone (SPZ) 1. Developers will need to consult with the Environment Agency to ensure the protection of the public water supply source is maintained and inform Southern Water of the outcome of this consultation.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Supporting Document (Commenting on policies)</a>



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

<b>Policy/Evidence base document</b>	KW1
<b>Name of respondent (or client)</b>	Taylor Wimpey Strategic Land
<b>Personal reference number</b>	ANON-AQTS-32TT-6
<b>Full reference number</b>	ANON-AQTS-32TT-6/3/KW1
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Whilst the Draft Plan proposes to allocate two sites at Kings Worthy, KW1 'Cornerways &amp; Merrydale' for 45 dwellings and KW2 'Land adjoining the Cart &amp; Horses' for 75 dwellings, both of these sites are for older persons housing. As such, the Draft Plan fails to deliver any open market or affordable housing in Kings Worthy. This is despite Kings Worthy being acknowledged as a sustainable location for new development and within a short distance of Winchester with the higher order services and facilities it has to offer. Whilst we do not object to the provision of sites for older persons housing, the requirement should be separated from the open market and affordable requirement and its supply identified separately. By only bringing forward development for elderly persons housing, the wider need for open market and affordable housing in the highly sustainable settlement of Kings Worthy is being ignored.</p> <p>As set out elsewhere in these representations, my client's site at Springvale Road, Kings Worthy (KW05), scored higher than the two allocations at Kings Worthy. KW05 offers the opportunity to provide high quality open market and affordable housing on a site which has no significant constraints and lies adjacent to the settlement policy boundary. Furthermore, it could address the deficit and imbalance of open space within the settlement through the provision of a significant new area of open space. As such, it should be allocated for development to help address the imbalanced distribution of housing across the District and the higher overall housing requirement.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Land at Springvale Road, Kings Worthy (ref. KW05) should be allocated for residential development. The Policies Map should also be amended to show the allocation of KW05.
<b>What is your suggested wording or text for the policy?</b>	A new allocation for Land at Springvale Road, Kings Worthy (ref. KW05) for about 250 dwellings should be added to the larger rural settlements grouping of allocations within the MTRA section of the Plan (starting at pg. 386). The table on pages 389 and 390 should be updated accordingly. Paragraph 14.88 should be amended to refer to a capacity of about 470 dwellings and the table 'Kings Worthy Housing Sources' on pg 439 should be amended to include the new allocation at Land at Springvale Road.
<b>Do you agree with how the policy will be monitored?</b>	

<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Supporting information (Illustrative concept masterplan)</a> <a href="#">Supporting information (Copy of letter re: Land at Springvale Road, Kings Worthy)</a>

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

None.

Local Plan Reference or document	Policy KW2 Land adjoining the Cart & Horses PH	
Total Number of Representations received	11	
Number of respondents who confirmed they consider the policy is –	<b>Yes</b>	<b>No</b>
Legally Compliant	7	2
Sound	4	5
Complies with Duty to Cooperate	6	3
<p><b>Summary of Representations</b></p> <p>There is significant support for this policy, including of addition of new criteria following the draft Local Plan. There are also significant concerns, primarily about the loss of / impact on woodland, biodiversity and use of a greenfield site. Some respondents suggest the Plan needs to be clearer about the location of development / retained woodland / greenspace, or about the proximity of the South Downs National Park and the Itchen SAC. The site promoter supports the allocation but promotes an increase in the estimated site capacity.</p>		
<p><b>Representation Numbers</b> (Statutory consultees in bold and named)</p> <p><b>ANON-AQTS-32U8-B/Historic England</b> (this representation does not have a full rep number because it was not directly entered into Citizenspace)</p> <p>ANON-AQTS-3BJK-3/1/KW2</p> <p><b>ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/18/KW2</b></p> <p>ANON-AQTS-3BBQ-1/1/KW2</p> <p><b>ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/9/KW2</b></p> <p>ANON-AQTS-32UM-Z/5/KW2</p> <p><b>ANON-AQTS-327U-A - Southern Water/22/KW2</b></p> <p>ANON-AQTS-32DW-S/1/KW2</p> <p><b>BHLF-AQTS-3282-8 - Natural England/12/KW2</b></p> <p>BHLF-AQTS-3284-A/12/KW2</p> <p><b>BHLF-AQTS-328R-8 - Hampshire County Council/16/KW2</b></p> <p>BHLF-AQTS-3267-B/7/KW2</p>		
<p><b>Main issues raised in representations received in regulation 19 consultation</b></p> <ul style="list-style-type: none"> <li>• Significant support for policy KW1;</li> <li>• Whether the impact of the allocation on woodland, biodiversity, etc is acceptable and whether the policy includes sufficient detail;</li> <li>• Whether the estimated capacity of the site should be increased.</li> </ul>		

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Guy Robinson
<b>Personal reference number</b>	ANON-AQTS-32U8-B - Historic England
<b>Full reference number</b>	
<b>Legally compliant?</b>	
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	Might reference be usefully made to the Kings Worthy Conservation Area Technical Assessment? Also, reference is made to “harmful impact on these” when perhaps it would be clearer to state “harmful impact on their setting”?
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a> <a href="#">Email correspondence (between officers and Historic England)</a> <a href="#">Email correspondence (between officers and Historic England re: suggested changes)</a>

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Andy Blaxland
<b>Personal reference number</b>	ANON-AQTS-32DW-S
<b>Full reference number</b>	ANON-AQTS-32DW-S/1/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>Policy KW2 allocates 4.7 hectares of land for the development of 75 dwelling equivalent units of older persons housing. Were it to be unconstrained, the site could accommodate a significantly higher number of dwelling units. However, the site is constrained by existing woodland, of mixed quality, but with a large part of it protected by a group TPO. The site is also sensitive as part of a local gap, located on the fringes of the National Park and a conservation area.</p> <p>The policy wording is considered unclear as to the relative balance between these constraints and as a result it is not possible to identify which parts of the relatively large site the Council is proposing would be developed and which would be retained as woodland or green space. This is considered to make the policy difficult for consultees to understand the potential impacts arising from its proposed development, and comment on, and may present difficulties at policy implementation stage. The Council should provide greater certainty and clarity on how the site is proposed to be developed within the Policy wording and supporting text now, to give further assurance as to the future development intentions for the site, and to ensure that a development consistent with those intentions results.</p> <p>Whilst the policy wording provides some guidance as to the nature of uses on the site, it is considered unsound as it fails to provide policy certainty on the location and scale of the woodland and green space proposed to be retained on the site. Significantly, given the public access to the site that has taken place over at least the last 20 years (it is currently disputed whether rights of way or other access now exists by right), the Policy is silent on whether any retained woodland and green space would be publicly accessible. There is a relative lack of publicly accessible woodland local to Kings Worthy and a Policy commitment to ensure that retained woodland and green space must be publicly accessible would be a public benefit arising from the site's development.</p> <p>A further concern relates to the junction improvements necessary to the Basingstoke Road, London Road and B3047 junction. The commitment in the Policy that the development should not take place until the junction is re-arranged is welcomed. However, the development of 75 dwelling equivalent units of older persons housing will not, on its own, provide sufficient funding to ensure that the junction re-arrangement can take place. Further funding from the Highway Authority and City Council will likely be necessary to ensure the junction improvement works can take place. Unless or until there is a commitment by those parties to provide</p>

	<p>their share of the funding, there is no guarantee that the junction improvements will take place and therefore the 75 dwelling equivalent units cannot be certain to be delivered. This raises doubt as to the deliverability of the allocation.</p> <p>A second and related concern on the junction improvements is that there may be future pressure for funding reasons for additional units of housing on the allocation site, above the 75 dwelling equivalents proposed in the Local Plan, especially if other sources of funding for the junction are not committed to, or if overall junction improvement costs increase over time. Increased development above the 75 units proposed in the Policy could lead to reduced areas for retained woodland and green space, and/or a denser form of development on the site, conflicting with the constraints of the site and surrounding area. Firmer commitments to funding should be sought from the Highway Authority and City Council.</p> <p>Finally, it is noted that the wording of paragraph 14.94 is not consistent with the wording of Policy KW2. the Policy wording on the type of older person housing was updated for the Reg 19 Plan, but the related wording in Para 14.94 was not also changed at the same time. This is a minor change and can easily be made.</p>
<p><b>What modification(s) are necessary to make the policy legally compliant or sound?</b></p>	<p>Policy KW2 allocates 4.7 hectares of land for the development of 75 dwelling equivalent units of older persons housing. Were it to be unconstrained, the site could accommodate a significantly higher number of dwelling units. However, the site is constrained by existing woodland, of mixed quality, but with a large part of it protected by a group TPO. The site is also sensitive as part of a local gap, located on the fringes of the National Park and a conservation area.</p> <p>The policy wording is considered unclear as to the relative balance between these constraints and as a result it is not possible to identify which parts of the relatively large site the Council is proposing would be developed and which would be retained as woodland or green space. This is considered to make the policy difficult for consultees to understand the potential impacts arising from its proposed development, and comment on, and may present difficulties at policy implementation stage. The Council should provide greater certainty and clarity on how the site is proposed to be developed within the Policy wording and supporting text now, to give further assurance as to the future development intentions for the site, and to ensure that a development consistent with those intentions results.</p> <p>Whilst the policy wording provides some guidance as to the nature of uses on the site, it is considered unsound as it fails to provide policy certainty on the location and scale of the woodland and green space proposed to be retained on the site. Significantly, given the public access to the site that has taken place over at least the last 20 years (it is currently disputed whether rights of way or other access now exists by right), the Policy is silent on whether any retained woodland and green space would be publicly accessible. There is a relative lack of publicly accessible woodland local to Kings Worthy and a Policy commitment to ensure that retained woodland and green space must be publicly accessible would be a public benefit arising from the site's development.</p> <p>A further concern relates to the junction improvements necessary to the Basingstoke Road, London Road and B3047 junction. The commitment in the Policy that the development should not take place until the junction is re-arranged is welcomed. However, the development of 75 dwelling equivalent units of older</p>



	<p>persons housing will not, on its own, provide sufficient funding to ensure that the junction re-arrangement can take place. Further funding from the Highway Authority and City Council will likely be necessary to ensure the junction improvement works can take place. Unless or until there is a commitment by those parties to provide their share of the funding, there is no guarantee that the junction improvements will take place and therefore the 75 dwelling equivalent units cannot be certain to be delivered. This raises doubt as to the deliverability of the allocation.</p> <p>A second and related concern on the junction improvements is that there may be future pressure for funding reasons for additional units of housing on the allocation site, above the 75 dwelling equivalents proposed in the Local Plan, especially if other sources of funding for the junction are not committed to, or if overall junction improvement costs increase over time. Increased development above the 75 units proposed in the Policy could lead to reduced areas for retained woodland and green space, and/or a denser form of development on the site, conflicting with the constraints of the site and surrounding area. Firmer commitments to funding should be sought from the Highway Authority and City Council.</p> <p>Finally, it is noted that the wording of paragraph 14.94 is not consistent with the wording of Policy KW2. the Policy wording on the type of older person housing was updated for the Reg 19 Plan, but the related wording in Para 14.94 was not also changed at the same time. This is a minor change and can easily be made.</p>
<b>What is your suggested wording or text for the policy?</b>	<p>Policy KW2 allocates 4.7 hectares of land for the development of 75 dwelling equivalent units of older persons housing. Were it to be unconstrained, the site could accommodate a significantly higher number of dwelling units. However, the site is constrained by existing woodland, of mixed quality, but with a large part of it protected by a group TPO. The site is also sensitive as part of a local gap, located on the fringes of the National Park and a conservation area.</p> <p>The policy wording is considered unclear as to the relative balance between these constraints and as a result it is not possible to identify which parts of the relatively large site the Council is proposing would be developed and which would be retained as woodland or green space. This is considered to make the policy difficult for consultees to understand the potential impacts arising from its proposed development, and comment on, and may present difficulties at policy implementation stage. The Council should provide greater certainty and clarity on how the site is proposed to be developed within the Policy wording and supporting text now, to give further assurance as to the future development intentions for the site, and to ensure that a development consistent with those intentions results.</p> <p>Whilst the policy wording provides some guidance as to the nature of uses on the site, it is considered unsound as it fails to provide policy certainty on the location and scale of the woodland and green space proposed to be retained on the site. Significantly, given the public access to the site that has taken place over at least the last 20 years (it is currently disputed whether rights of way or other access now exists by right), the Policy is silent on whether any retained woodland and green space would be publicly accessible. There is a relative lack of publicly accessible woodland local to Kings Worthy and a Policy commitment to ensure that retained woodland and green space must be publicly accessible would be a public benefit arising from the site's development.</p>

	<p>A further concern relates to the junction improvements necessary to the Basingstoke Road, London Road and B3047 junction. The commitment in the Policy that the development should not take place until the junction is re-arranged is welcomed. However, the development of 75 dwelling equivalent units of older persons housing will not, on its own, provide sufficient funding to ensure that the junction re-arrangement can take place. Further funding from the Highway Authority and City Council will likely be necessary to ensure the junction improvement works can take place. Unless or until there is a commitment by those parties to provide their share of the funding, there is no guarantee that the junction improvements will take place and therefore the 75 dwelling equivalent units cannot be certain to be delivered. This raises doubt as to the deliverability of the allocation.</p> <p>A second and related concern on the junction improvements is that there may be future pressure for funding reasons for additional units of housing on the allocation site, above the 75 dwelling equivalents proposed in the Local Plan, especially if other sources of funding for the junction are not committed to, or if overall junction improvement costs increase over time. Increased development above the 75 units proposed in the Policy could lead to reduced areas for retained woodland and green space, and/or a denser form of development on the site, conflicting with the constraints of the site and surrounding area. Firmer commitments to funding should be sought from the Highway Authority and City Council.</p> <p>Finally, it is noted that the wording of paragraph 14.94 is not consistent with the wording of Policy KW2. the Policy wording on the type of older person housing was updated for the Reg 19 Plan, but the related wording in Para 14.94 was not also changed at the same time. This is a minor change and can easily be made.</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Andy Key
<b>Personal reference number</b>	BHLF-AQTS-3284-A
<b>Full reference number</b>	BHLF-AQTS-3284-A/12/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	Fails on being effective and consistent with national policy. Fails to reference the district LCWIP or the proposed Kings Worthy to Winchester cycle route; manages to reference the A33/B3047 junction but does not make it clear that cycle and pedestrian access across that junction must be improved.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	“iii. Provide for the rearrangement of the Basingstoke Road, London Road and B3047 junction so as to ensure safe vehicular access from Basingstoke Road, while protecting the important belt of trees on that edge of the site;, and improve pedestrian and cycle access across this junction in all directions; contribute to the development of the proposed Kings Worthy to Winchester cycle route as defined in the District and City LCWIPs. iv. Provide a pedestrian and cycling active travel link to the Hinton Field public open space; v. Contribute to any other off-site junction improvements necessary in order to improve cycling, walking and wheeling links to the surrounding area.. “
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been</i>	Yes <a href="#">Form (commenting on policies)</a> <a href="#">Letter (commenting on policies)</a>

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

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Blenheim Strategic Partners LLP
<b>Personal reference number</b>	BHLF-AQTS-3267-B
<b>Full reference number</b>	BHLF-AQTS-3267-B/7/KW2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	<p>Response: Object - The land is adjacent to the Cart and Horses Public House and has been left to nature for many years. It is no longer in 'active' agricultural use and the biodiversity and habitats have developed and are diverse with varied species of flora and fauna (including Peregrine Falcons). Any development would have a significant adverse impact upon the biodiversity and result in a net loss. Development would also have a severe impact upon its bearing within the wider ecological network and would compromise habitat connectivity for local species. Site is unlikely to achieve 10% biodiversity net gain without offsetting given that it will already have a high baseline score. - The site would have a major adverse impact upon the settlement gap between Kings Worthy and Abbots Worthy. The site falls within a settlement gap (see adopted Policy CP18). The site was previously considered by an inspector when the existing adopted Local Plan was examined, and the inspector's report confirms that the gap in this location is crucial given that both settlements are distinct. "The important point is that despite the small gap between them, Kings Worthy and Abbots Worthy are perceived as being quite separate with a definite sense of leaving one settlement and having to cross the A33 and a swathe of countryside before arrival at the other. I regard this actual and perceived separation as being important to maintain, not just because of the intrinsic quality of the rural landscape, but also because it is crucial to the setting of the Abbots Worthy Conservation Area" - The proposed use is for care / sheltered accommodation, this is a form of specialist housing which will not meet the market housing needs identified within the Strategic Housing Market Assessment. If the site is going to be delivering Care then the allocation should be for a C2 use.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	

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

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Elizabeth Atherton
<b>Personal reference number</b>	ANON-AQTS-3BBQ-1
<b>Full reference number</b>	ANON-AQTS-3BBQ-1/1/KW2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	This area is woodland and the habitat for the wildlife that lives there needs to be protected.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	This area is woodland and the habitat of the wildlife that lives there needs to be protected.
<b>What is your suggested wording or text for the policy?</b>	This area is woodland and the habitat of the wildlife that lives there needs to be protected.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Ellen Satchwell
<b>Personal reference number</b>	BHLF-AQTS-3282-8 - Natural England
<b>Full reference number</b>	BHLF-AQTS-3282-8 - Natural England/12/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	In our previous response to the Regulation 18 draft Plan we advised that this policy should take into consideration the proximity to the River Itchen SAC and SSSI, we recommended strengthening this policy to require assessment of potential impacts from surface water run-off and incorporation of naturalised SuDS features. It is disappointing that the policy has not been strengthened to ensure there are no adverse effects on the protected sites, and there is no mention of the River Itchen SAC included in the policy text, protection of the River Itchen SAC should be a priority for this allocation.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (Commenting on policies and evidence base)</a> <a href="#">Email correspondence (between Officers and NE re: compensatory habitats and SWBGS sites)</a> <a href="#">Form (commenting on Air Quality only)</a>



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

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Martin Miller, tor&co Ltd (Formerly Terence O'Rourke Ltd)
<b>Personal reference number</b>	ANON-AQTS-32UM-Z
<b>Full reference number</b>	ANON-AQTS-32UM-Z/5/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p><b>This comment has been summarised – see supporting information for full response</b></p> <p>The respondent supports policy KW2. The respondent cites the PPG (Paragraph: 001 Reference ID: 63-001-20190626 and a report by Professor Mayhew highlighting the government needs to initiate an accelerated programme of constructing older people's housing with up to 50,000 new units a year, which would represent 13.5% of the new government's annual housing target. The respondent states that the site is close to facilities and services and that agreement has been reached in principle with Hampshire County Council over how to access the site and deliver highway improvements at the same time which will enable the known accident blackspot at the junction of London Road with the A33 to be eliminated. These improvements represent a significant opportunity to deliver public benefits to residents of and visitors to King's Worthy and they form an integral element of the site's proposed development. Anchor Properties therefore specifically supports paragraph 14.94 which correctly recognises that the location and characteristics of the site make it suited to the development of older person's housing.</p> <p>The respondent seeks an increase in site capacity. The respondent is concerned that the scale of proposed development at the site has been derived from a mathematical exercise, rather than from any detailed consideration of a variety of important factors, including the site's constraints, the site's potential to deliver badly needed older persons housing, the potential to deliver a high quality place or the proposed development's viability. The respondent states that the plan should refer to the likely capacity of sites in real terms so that descriptions of development for planning applications can be formulated and applications determined in accordance with development plan policies, irrespective of the contribution a development makes to housing supply. Within the last 18 months, Hampshire County Council has announced plans to open a new care home in King's Worthy, close to site KW2. Consequently, Anchor Properties is very unlikely to be seeking to provide a care home as part of the development of site KW2. Instead, it is likely to be bringing forward plans for an integrated retirement community of circa 120 dwellings. Such a scale of development will maximise the potential financial contribution that the scheme can make to the upgrade of the adjacent road junction. We therefore request that the wording of policy KW2 is amended.</p>

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

The allocation of land adjacent to the Cart and Horses Public Housing in King's Worthy for the development of older person's housing and open space is the only site-specific allocation for older person's housing in the draft Winchester Local Plan and is wholeheartedly supported by Anchor Properties. National planning policy guidance published by the government in 2019 states that the need to provide housing for older people is critical and confirms that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems (Paragraph: 001 Reference ID: 63-001-20190626). In October 2022, leading academic Professor Les Mayhew published a report which indicated that the government needs to initiate an accelerated programme of constructing older people's housing with up to 50,000 new units a year, which would represent 13.5% of the new government's annual housing target.

The location of the site close to local facilities and public transport services and the physical characteristics of the site offer a fantastic opportunity to deliver high-quality, purpose-built accommodation for older people. At the same time, agreement has been reached in principle with Hampshire County Council over how to access the site and deliver highway improvements at the same time which will enable the known accident blackspot at the junction of London Road with the A33 to be eliminated. These improvements represent a significant opportunity to deliver public benefits to residents of and visitors to King's Worthy and they form an integral element of the site's proposed development. Anchor Properties therefore specifically supports paragraph 14.94 which correctly recognises that the location and characteristics of the site make it suited to the development of older person's housing.

However, Anchor Properties is concerned that the scale of proposed development at the site has been derived from a mathematical exercise, rather than from any detailed consideration of a variety of important factors, including the site's constraints, the site's potential to deliver badly needed older persons housing, the potential to deliver a high quality place or the proposed development's viability. In March 2022, Winchester City Council published a local plan update indicating that it wished to see an additional 90-100 homes in King's Worthy, and this was eventually represented by the two proposed allocations, one for 30 dwellings (policy KW1) and one for 70 dwelling equivalents (policy KW2).

The term "dwelling equivalents" is commonly used when assessing the contribution of specialist forms of housing, such as a care homes or student accommodation, to housing land supply. But local plan allocations should refer to the likely capacity of sites in real terms so that descriptions of development for planning applications can be formulated and applications determined in accordance with development plan policies, irrespective of the contribution a development makes to housing supply.

Within the last 18 months, Hampshire County Council has announced plans to open a new care home in King's Worthy, close to site KW2. Consequently, Anchor Properties is very unlikely to be seeking to provide a care home as part of the development of site KW2. Instead, it is likely to be bringing forward plans for an integrated retirement community of circa 120 dwellings. Such a scale of development will maximise the potential financial contribution that the scheme can make to the upgrade of the adjacent road junction.

	<p>Although Anchor Properties welcomes the increase in site capacity compared to the allocation in the Regulation 18 Plan, they seek an amended wording for the policy which seeks to refer to the site's capacity. We therefore request that the wording of policy KW2 is amended.</p>
<p><b>What is your suggested wording or text for the policy?</b></p>	<p>'Land adjoining the Cart &amp; Horses PH, Basingstoke Road, as shown on the Policies Map, is allocated for the development of an integrated retirement community of around 120 dwellings. Planning permission will be granted provided that detailed proposals accord with the Development Plan and meet the following specific development requirements: ...'</p>
<p><b>Do you agree with how the policy will be monitored?</b></p>	
<p><b>If no, please explain</b></p>	
<p><b>Do you want to participate in hearing sessions for this policy?</b></p>	<p>Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate</p>
<p><b>Have you submitted supporting information?</b>  <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Morag Kirby
<b>Personal reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB
<b>Full reference number</b>	ANON-AQTS-3B56-S - NHS Hampshire and Isle of Wight ICB/18/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	The ICB supports the current policy statements.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <a href="#">Letter (commenting on policies)</a>

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Neil Massie
<b>Personal reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council
<b>Full reference number</b>	BHLF-AQTS-328R-8 - Hampshire County Council/16/KW2
<b>Legally compliant?</b>	
<b>Sound?</b>	
<b>Complies with duty to co-operate?</b>	
<b>Policy/Document comment</b>	75 dwellings is likely to generate up to 23 primary age pupils and 16 secondary. The site is served by Kings Worthy Primary and Henry Beaufort secondary. Kings Worthy Primary School is forecasted to be at, or close to its capacity. Henry Beaufort will be under pressure from developments at Barton Farm and Sir John Moore Barracks. In order to accommodate the additional number of children forecast from these new homes developer contributions towards both primary and secondary provision may be required.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Letter (commenting on policies and evidence base)</a>

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

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Richard
<b>Personal reference number</b>	ANON-AQTS-3BJK-3
<b>Full reference number</b>	ANON-AQTS-3BJK-3/1/KW2
<b>Legally compliant?</b>	No
<b>Sound?</b>	No
<b>Complies with duty to co-operate?</b>	No
<b>Policy/Document comment</b>	<p>Building houses on the only patch of woodland within kings worthy is only furthering worsening climate change, and goes against not building on green land. This area, including the field adjacent to it, is widely used by walkers and children, and removing it will only further reduce the already limited green access space. Having a few paths around the few remaining trees and a bare field is not acceptable.</p> <p>The area has a large biodiversity of wildlife and plants, not present within the rest of kings worthy. The fields surrounding kings worthy are sparse ( due to agricultural use) and contain little to no biodiversity. Removing this woodland for more housing only decreases the habitat available for wildlife.</p> <p>The area is also located on a hill, the woodland helps absorb significant rainfall, placing houses here will vastly increase the risk of flooding to the cart and horses junction, a critical junction to kings worthy and access to the a34.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	Not build there. Ultimately the desire to build more houses and prepare for a climate emergency are not compatible, unless efforts are made to increase woodland and biodiversity. Kings worthy needs more woodland and green space, not less.
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or</i>	No



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

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	Ryan Patrick Lownds
<b>Personal reference number</b>	ANON-AQTS-327U-A - Southern Water
<b>Full reference number</b>	ANON-AQTS-327U-A - Southern Water/22/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	<p>We welcome the inclusion of the criterion below for Policy KW2 Cart &amp; Horses:  Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.  Ensure that the groundwater Source Protection Zone is protected  Supporting Text:  This is because our initial assessment of this site ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.  Our assessment also revealed that the site lies within groundwater Source Protection Zone (SPZ) 1.  Developers will need to consult with the Environment Agency to ensure the protection of the public water supply source is maintained and inform Southern Water of the outcome of this consultation.</p>
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session

<p><b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes <a href="#">Supporting Document (Commenting on policies)</a></p>
---	---

<b>Policy/Evidence base document</b>	KW2
<b>Name of respondent (or client)</b>	South Downs National Park Authority (SDNPA)
<b>Personal reference number</b>	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)
<b>Full reference number</b>	ANON-AQTS-329Z-H - South Downs National Park Authority (SDNPA)/9/KW2
<b>Legally compliant?</b>	Yes
<b>Sound?</b>	Yes
<b>Complies with duty to co-operate?</b>	Yes
<b>Policy/Document comment</b>	As set out in the Statement of Common Ground, the SDNPA has no “in principle” concerns about this allocation and is content with the detailed wording of the policy. Notwithstanding the above, we request that the boundary of the South Downs National Park is added to the inset maps, site plans and wider context plans for Policy KW2. This will assist applicants and case officers in understanding the relationship of the settlement and site within the setting of the South Downs National Park.
<b>What modification(s) are necessary to make the policy legally compliant or sound?</b>	
<b>What is your suggested wording or text for the policy?</b>	We request that the boundary of the South Downs National Park is added to the inset maps, site plans and wider context plans for Policy KW2. This will assist applicants and case officers in understanding the relationship of the settlement and site within the setting of the South Downs National Park.
<b>Do you agree with how the policy will be monitored?</b>	
<b>If no, please explain</b>	
<b>Do you want to participate in hearing sessions for this policy?</b>	No, I don't want to take part in a hearing session
<b>Have you submitted supporting information?</b> <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	Yes <a href="#">Email (Commenting on NE8)</a> <a href="#">Letter (Commenting on policies)</a> <a href="#">Email correspondence (Re policy NE8)</a>

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

**WCC Response.**

Comments noted.

**WCC Recommended Changes arising from representations:**

No changes apart from:

[Proposed Modifications](#) to Local Plan paragraph 14.95 (page 444) to address comments from Historic England.

[Proposed Modification to Local Plan policies map](#) to include the boundary of the South Downs National Park in the allocation and inset maps in response to comments by SDNPA.