

## Privacy and publication

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### Privacy Notice

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

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#### 1. Please confirm that you have read and understood the above.

(Required)

## About you

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

### 2. What is your full name or client's name if acting as an agent?

Name of respondent (or client): (Required)

### 3. If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent:

### 4. What is your address?

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: (Required)

Street address 1: (Required)

Street address 2:

Town/area: (Required)

Postcode: (Required)

**5. What is your email address?**

Email address:

**6. What is your phone number?**

(Required)

Phone number:

**7. By submitting this form I acknowledge that;**

**a) my response, together with supporting information, which includes my name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and**

**b) my name will be published, together with my response, in the Winchester City Council Local Plan Examination website.**

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

Yes, I would like to be kept up to date with Local Plan developments

No

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**T1: Sustainable and active transport and travel**

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being positively prepared, effective and consistent with national policy.

The policy requirements here are too vague and ambiguous to be effective.

It is not enough for the developer to include a transport assessment that quantifies these things: it must show **how** the development will achieve them.

Please make sure that you put in all the evidence and information needed to support your representation.

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

**Para ii** is especially ambiguous: it should be made clear that the phrase “*reduces the number of trips made by private motor vehicle*” means a reduction **compared to the levels prior to the development**. As currently worded it would allow developers to create an initial prediction of large traffic increases, then produce a revised transport assessment that makes the increase slightly smaller and claim that they have fulfilled the terms of the policy. This has happened in developments under the current Local Plan; the revised Local Plan does nothing to strengthen or clarify the requirement. (Example: McDonalds drive-in development, Winnall.)

**Para iii** is also ambiguous and ineffective. “Prioritising the concept of 20-minute neighbourhoods” means nothing in practice. See below for suggested wording.

**Para iv** needs to refer explicitly to the city and district LCWIPs, as without this the definition of “wider network” is open to abuse.

**Para vii:** is inconsistent with para ii. To be consistent, this needs to demonstrate that the use of new or existing accesses will not lead to an increase in the overall level of motor traffic. This is not the same as “significant congestion/delays”, a term which focuses entirely on the effect on motor traffic to the exclusion of other forms of transport.

**Para viii** needs to mention secure, covered storage for cycles explicitly (including non-standard pedal vehicles such as cargo bikes and trikes). This is the top priority for encouraging cycle travel. The phrase “lockers/storage” could be interpreted as meaning simply storage for clothing. The use of the phrase “where appropriate” is also a hostage to fortune as developers will simply claim that it’s not appropriate in their case, as happens at present. (Example: recent development application at Three Maids Hill, where active travel access and facilities were dismissed as irrelevant while providing detailed plans for car parking.) Active travel access is *always* appropriate, including in rural areas.

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

Para ii should be unambiguous:

*“Development so that it reduces the number of trips made by private motor vehicle **compared to current levels** as well as maximising opportunities to walk and cycle...”*

Para iii:

At the very least, expand this to add *“... by demonstrating how residents or workers in the development will be able to reach a range of retail, leisure and service facilities within 20 minutes using active travel means.”*

Para iv:

*“Integrating sustainable and active travel routes into the layout with connections to the wider network **as outlined by the Winchester City and District LCWIP network plans...**”*

Para vii:

*...of existing accesses onto the road network that can demonstrate **that they will not lead to an increase in the overall level of motor vehicle traffic in the area...**”*

Para viii:

*“...will need to provide ~~where appropriate~~ **secure, covered cycle storage for employees and sufficient visitor cycle parking space (as defined by the parking standards) for visitors and customers., as well as** measures such as showers, changing areas and lockers/storage to cater for employees...”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy T2: Parking for new developments**

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being positively prepared, effective and consistent with national policy.

**Para i** has a problem with the ambiguous use of “prioritised”. . While a layperson reading this might assume it means “give them top priority” it’s not what the word actually means.

To prioritise is just to place a number of things in priority order. A developer or transport consultant could claim “Yes, we prioritised cycling and walking along with everything else and it came out at number 9 in our priority list, just below ‘extra-big parking spaces for SUVs.’” Here and wherever “prioritise” is used, it needs to be made clear that active travel should be given the highest priority, not just a priority.

**Para iv** is ineffective without a standard for the quantity of cycle parking, with levels set for both resident and visitor parking. The council does not have a comprehensive standard for this, and it needs one. At the moment WCC has only a car parking SPD approved in 2009 which does not meet NPPF requirements, only mentions cycle parking very briefly, and relies on a long-obsolete Hampshire County council policy from 2002 that HCC itself no longer recognises.

We suggest referring to a cycle parking standard here and ensuring that a comprehensive, up-to-date one is in place by the time this plan is approved. Note that the lack of a suitable parking standard indicates a failure to co-operate effectively with the county council on this topic..

**Para v** is ineffective without some kind of guidance. As it stands, it is a loophole that would

Please make sure that you put in all the evidence and information needed to support your representation.

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

Para 1: clarify “prioritised”

Para iv: Refer to a *cycle* parking standard and ensure that one is created, agreed with the highway authority and approved as soon as possible.

Para v: Set some parameters for this to avoid creating a policy loophole.

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

Para i:

*“...sustainable transport modes have been ~~prioritised~~ **given top priority** in the design process...”*

Para iv:

*“Secure parking for e-mobility, mobility scooters or any other form of non-car transport must be provided **in conformance with the council’s cycle parking standards...**” – and ensure that robust valid standards exist.*

Para v:

***Car parking for commercial uses will only be considered where adequate parking provision has been made for customers and visitors arriving by active travel means (see (iv) above) and will be considered on a case by case basis.***



**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**T3: Enabling Sustainable Travel Modes of Transport and the Design and Layout of**

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective.

This appears to be referring only to car (and other motor vehicle) parking. Despite its title it doesn't address the need to favour sustainable travel modes at all and therefore fails to meet NPPF requirements.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Either

(a) make it clearer that this policy is entirely about car parking, or

(b) ensure it includes guidance about designing new developments to put active travel routes at a higher priority level than car parking.

(b) would be preferable. Ironically, the requirements stated in para vi are almost *exactly* the requirements stated for walking and cycling paths (not for car parking!) in the PCPI Secured By Design standards, so a simple wording change in this paragraph would fulfil the active travel brief. The supporting text should reference the Secured By Design standards.

**What is your suggested wording or text for the policy:**

*“In order to prioritise sustainable and active modes of travel planning applications (excluding householder applications) will be required to demonstrate through the design process **that they are giving high priority to active travel, and are thereby minimising the need for parking provision.**”*

*[...]*

*“ vi. The design provides attractive, landscaped and safe ~~parking areas~~ **active travel routes** which are overlooked by dwellings or other areas of active public use providing surveillance and are accompanied with associated long term maintenance plans. **Car parking facilities will only be permitted when the design also fulfils the active travel route requirements.**”*

## What area of the Local Plan would you like to comment on?

Policy and paragraph number: (Required)

**T4: Access for New Developments**

## Do you consider the supporting text and policy are:

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being positively prepared, effective and consistent with national policy.

### **Para i:**

First sentence doesn't make sense. It needs rewriting.

It needs to reference the city and district LCWIPs explicitly as guidance. Without this there is no clear definition of what routes "to, from and within the site" means, so the policy cannot be effective.

It should also add "through" the site to that list to be compliant with national policy; new developments are often an opportunity to improve permeability for active travel between nearby destinations (e.g. the Sir John Moore Barracks redevelopment, which has the potential to unlock active travel between Littleton, Harestock and Weeke).

Again this policy uses the ambiguous word "prioritises" without making it clear that this means prioritising cycling, walking and wheeling *above* other modes of transport.

**Para v** is far too ambiguous to be effective. It needs to define "reasonable".

For example it could specify that such sites should have direct access onto an trunk or 'A' road, with access via 'B' and 'C' roads only to be considered if the road in question has not been identified as an active travel route.

Unclassified roads should never be an acceptable access route for large numbers of HGVs. This is especially important in rural and semi-rural areas.

To be consistent with para i it also needs to specify that site design should ensure that safe, convenient and segregated active travel access into the site is provided in a situation where there are many HGV movements.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Modifications as described above.

**What is your suggested wording or text for the policy:**

Para i:

*"Gives to top priority to ~~Prioritises the needs of walking, wheeling and cycling~~ **by providing** (as set out in LTN 1/20) safe and attractive **LTN 1/20 compliant** routes from, **through** and within the site which connect to **the existing active travel network as defined by the City and District LCWIPs** ~~Public Rights of Way network~~ outside the site boundary and the nearest public transport stop, minimising the scope for conflicts between all users;*

[This would be better and clearer if it were written in multiple sentences rather than one long one, but that means changing the wording of the whole section.]

Para v:

*"Any sites that are likely to generate large numbers of HGV movements need to be in reasonable proximity and accessible to **the Major Road Network or the Strategic Road Network. 'Reasonable proximity' generally means direct access onto a trunk or 'A' road. Access via 'B' or 'C' roads will only be considered if the road in question has not been identified as an active travel route, is not regularly used by cyclists, horse riders and pedestrians, and is not a designated road under the Quiet Lanes and Home Zones (England) Regulations 2006. HGV access via unclassified roads will only be considered where it serves an existing facility such as a farm.**"*

## What area of the Local Plan would you like to comment on?

Policy and paragraph number: (Required)

**NE4: Green and Blue Infrastructure**

## Do you consider the supporting text and policy are:

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being positively prepared, effective and consistent with national policy.

To address the ambitions laid out in the Transport section, this policy needs to be more explicit about the non-motorised travel routes it describes. Without this it will fail to address national policy and it will not be positively prepared.

Currently it fails to take into account the joint work between the city and county councils on developing rural active travel routes; it also fails to take into account the plans and longer-term aims of neighbouring local authorities. All but one of the listed disused railway line routes are all identified as potential active travel routes in the draft District LCWIP, which means they will need to be not just safeguarded but upgraded to provide an all-weather surface and access suitable for walking, cycling and wheeling year-round for utility purposes.

For example, the advent of e-bikes means that cycle-commuting from Alresford and the upper Itchen Valley villages to Kings Worthy and Winchester) would be viable for many people, as would commuting from the Meon Valley villages to Wickham and from Wickham to Fareham.

The one railway line not currently in the draft Winchester District LCWIP is the Meon Valley Trail, which was missed off the first draft of the LCWIP but is likely to be included in future revisions – not least because the East Hants LCWIP includes a plan to upgrade the Meon Valley line north from West Meon to Alton to an active travel route, so the southern section needs to link with this. At the Wickham end, it links into the Fareham LCWIP.

The failure to identify this important link with both the Fareham and East Hampshire LCWIP networks indicates a failure to agree priorities with neighbouring authorities and a failure to deliver effective cross-boundary working.

Please make sure that you put in all the evidence and information needed to support your representation.

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

To be effective, this section needs to specify that any development near to these lines should show how it will contribute to *improving* them as active travel routes, not just preserving them.

**What is your suggested wording or text for the policy:**

*“vi. Includes proposals for walking, cycling and equestrian routes provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the district. **Where these routes have been identified as active travel routes, the proposals must include upgrading them to a standard suitable for year-round, all-weather use.**”*

Suggest an additional paragraph:

***“Where routes have been identified as part of the active travel network as outline by the District LCWIP and the county’s wider network plan, proposals must include the upgrading of these routes to allow for safe, efficient all-weather use year-round. This means provision of a smooth, robust all-weather surface, usability for users of mobility aids, and – where possible – appropriate lighting.”***

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy NE7: Settlement gaps**

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective.

This policy is not consistent with the Transport policies as it stands, nor with national policy.

Many of the named gaps divide satellite settlements from larger villages or towns which contain employment and services that residents of the satellite settlements need to access.

The Transport policies aim to provide safe, usable active travel routes between these locations.

To be consistent, this policy should therefore make it clear that it does not preclude the creation of high-quality, well-surfaced, appropriately-lit active travel routes across the settlement gaps.

Without this exception, there is a danger that policy NE7 will be used as an excuse for developers (and the highway authority) to avoid contributing to active travel routes between settlements, resulting in a failure to deliver on the Plan.

Example: Hampshire County Council is currently seeking funding to build a high-quality, lit, cycle route between Winchester and Kings Worthy along the Worthy Road. This is vital for active travel aspirations in the Winchester area as it would enable residents of the Worthys to travel by cycle/e-bike to the services, educational establishments and employment areas of Winchester. As currently written, this policy would result in the rejection of the county council's plans.

Please make sure that you put in all the evidence and information needed to support your representation.

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

To be consistent with the Transport policies and national policy, this policy should make it clear that it does not preclude the creation of high-quality, well-surfaced, appropriately-lit active travel routes across the settlement gaps.

**What is your suggested wording or text for the policy:**

Additional paragraph:

***“The Council will, however, support the development of high-quality active travel corridors (to LTN 1/20 standard) across these gaps with the aim of reducing motor traffic on the connecting roads.”***



**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy NE13: Leisure and Recreation in the Countryside**

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective.

To be consistent with the Travel policies, any development of this kind should provide active travel access and should contribute to the wider district active travel network.

Developers should be able to demonstrate how potential visitors *and* staff working at the site can reach the facility by active travel means and/ public transport from nearby settlements.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Require developments to demonstrate active travel access.

**What is your suggested wording or text for the policy:**

Additional paragraph after para iv:

*“v. The proposed development includes safe, convenient active travel connections (to LTN 1/20) from nearby settlements, connections to the active travel network as defined by the city and district LCWIPs, and a viable active travel route between the development and the nearest bus and railway stations. The development will be subject to the conditions of this plan’s Transport Policies section in the same way as any other development, regardless of its location.”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy NE14: Rural Character

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being justified and effective.

*“The impact resulting from the volume and type of traffic generated by the development will be assessed along with the ability of rural roads to accept increased levels of traffic without alterations that would harm their rural character.”*

This conflicts with policy T1, where developers are expected to demonstrate that their development will *not* add to existing traffic levels.

This is especially important for rural roads that are recognised – or identified in the district LCWIP - as being part of rural active travel routes.

As it stands, this policy undermines the Transport policies and contradicts national policy. The policy should be worded to guard against traffic increases on rural roads, especially (as noted above) where these would impact on rural cycle routes connecting settlements.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Delete the non-compliant paragraph and replace it with one that emphasises the need for all developments to meet the requirements of the Transport policies.

**What is your suggested wording or text for the policy:**

Delete:

~~*“The impact resulting from the volume and type of traffic generated by the development will be assessed along with the ability of rural roads to accept increased levels of traffic without alterations that would harm their rural character.”*~~

Replace it with:

***“The development will be expected to comply with the policies in the Transport section of this Plan in the same way as any other development. In particular, it must demonstrate active travel links with the District LCWIP network and must avoid increasing motor traffic on routes currently used for walking, cycling, wheeling or horse riding.”***

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy H6: Affordable housing**

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective.

Inconsistent with the Transport policies. No mention of requirement to develop in an area served by affordable means of transport. Occupants of affordable housing are more likely to be in lower-income brackets and therefore less likely to have access to private cars, so have greater-than-average requirements for good public and active travel links. (For example, a Health Foundation study in 2024 found that in the poorest quintile of households, 28% have no access to a car.) This makes it especially important that affordable housing and mixed developments follow the policies laid out in the Transport section.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Add a paragraph to make it clear that affordable housing must have easy access to public transport and active travel networks.

**What is your suggested wording or text for the policy:**

Add:

***“It is especially important that affordable housing developments have access to public transport and active transport links as defined in this Plan’s Transport policies. They are not exempt from those requirements.”***

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**H9 Purpose Built Student accommodation**

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy and with the Transport policies in the Plan.

*“ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by existing / proposed walking, cycling or public transport routes;”*

This should be “walking, cycling **and** public transport”. Sustainable transport is about providing as many options as possible. It shouldn’t be acceptable to provide accommodation that (for instance) is accessible only by bus or car, not by bike or foot.

*“iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel, discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area”*

This is a self-contradictory policy. “Adequate” car parking provision only encourages private car use. Regulation can be used to limit on-street parking in the surrounding area.

To meet the aims of the Transport policies, use of private cars needs to be discouraged.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Modify as indicated above.

**What is your suggested wording or text for the policy:**

*“ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by existing / proposed walking, cycling or **and** public transport routes;”*

*“iii. Adequate cycle ~~and car parking~~ provision is made within the development, designed to encourage active travel. **Car parking provision must be limited – and parking restrictions introduced in the surrounding area if necessary – in order to** discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area. **Like any other development, student accommodation developments must meet the Transport policies of this Plan.**”*



**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy H12 Gypsies, Travellers etc.

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.

*“ii. Sites should be accessible to local services such as schools, health and community services by public transport, on foot or by cycle”*

Again this should be *“... on foot **and** by cycle”* to be consistent with national policy and to ensure developers don't try to avoid their responsibilities by enabling access to only one form of travel.

Please make sure that you put in all the evidence and information needed to support your representation.

**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:**

*“ii. Sites should be accessible to local services such as schools, health and community services by public transport, on foot ~~or~~ **and** by cycle”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy W1 Barton Farm

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective .  
**Para vi** only mentions the Winchester District LCWIP. Part of this development is within the Winchester City LCWIP area so this should also be referenced

Please make sure that you put in all the evidence and information needed to support your representation.

**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:**

*“... to the principles as set out in the Winchester Movement Strategy, Hampshire Bus Service Improvement Plan, **Winchester City LCWIP** and Winchester District LCWIP..”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy W2: Sir John Moore Barracks**

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.

**Para vii** should make it clear that “access” here refers only to motor vehicle access. It is expected that there will be multiple pedestrian, cycling and wheeling access points to fulfil the requirements of para viii.

It is also ambiguous: it does not state that the *only* motor vehicle access should be off Andover Road, which is presumably what was intended.

**Para viii** fails to mention either the District LCWIP or the City LCWIP, both of which are relevant to this area, which falls on the boundary between the two and can deliver key links for both.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Amend paras vii and vii.

**What is your suggested wording or text for the policy:**

*“vii. **The sole motor vehicle access point (aside from emergency vehicles)** should be off Andover Road;*

*viii. Include direct, safe and lit, active travel links as part of a strategy that minimises car journeys from the development. High quality facilities for walking, cycling and wheeling and public transport that is connected to the surrounding area/PROW/cycle network in accordance with the **Winchester City LCWIP, Winchester District LCWIP**, Hampshire Movement and Place Framework and Healthy Streets approach;”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy W5: Bushfield Camp**

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being positively prepared, effective and consistent with national policy.

**Para v** should specify active and sustainable travel links to Shawford station as well as Winchester station. Shawford station is currently under-utilised: as it is likely that a large proportion of the workers on the site will be arriving from the south of the county, this is an obvious connection. Failure to take this into account will have a knock-on effect for neighbouring authorities.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Add reference to active travel links to Shawford Station.

**What is your suggested wording or text for the policy:**

At end of Para v:

*“... and links to the Winchester train station, **Shawford train station**, the city centre and existing nearby park and ride facility;”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy W8: Station Approach Regeneration area

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.  
Fails to reference the city LCWIP, which is very relevant to this area.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Add reference to LCWIP.

**What is your suggested wording or text for the policy:**

In para iv:  
*“...enabling people to walk and cycle for most everyday trips and improving those links to the railway station, the surrounding area and other key destinations **in accordance with the Winchester City LCWIP;**”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy W10: Former River Park Leisure Centre site**

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.  
Again, fails to reference the city LCWIP or the need for suitable cycling, walking and wheeling routes connecting the area. This area is currently a weak link in several potential active travel routes and any development should be required to resolve that.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Refer to LCWIP.

**What is your suggested wording or text for the policy:**

New para xii:  
***“xii: The proposals must enable public active travel links to and through the site as outlines in the Winchester City LCWIP and Winchester Movement Strategy.”***



**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy W11: University/Hospital

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.  
  
Though para iv mentions cycle and pedestrian access it fails to reference the city LCWIP. As a major employment area, improving the cycling network into and around this site should be a requirement.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Add reference to LCWIP.

**What is your suggested wording or text for the policy:**

*“iv. Use existing access points and make improvements to these as necessary, particularly to improve **public** cycle and pedestrian access **both to and through the site, in accordance with the Winchester City LCWIP.**”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**Policy SH11: Newlands**

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being positively prepared, effective and consistent with national policy.  
Fails to specify any requirement for active travel connections to surrounding settlements apart from a passing mention of Waterlooville centre. No mention of the District LCWIP despite mentions in the supporting text. There is no evidence that links outside the district have been allowed for at all, despite its proximity to the Portsmouth/Cosham/Portchester area where many of the residents of this new development are likely to work.

Please make sure that you put in all the evidence and information needed to support your representation.

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

Refer to District LCWIP, links to all neighbouring settlements, and active travel networks in neighbouring authorities.

New para ix:  
***“ix. Provide active travel links to all surrounding communities including Denmead and the South Hampshire urban area (Portsmouth, Portsdown, Paulsgrove, Portchester) and make connections to the active travel network defined in the Winchester District LCWIP as well as the LCWIP networks of neighbouring authorities including Portsmouth, Fareham and Havant.”***

**What is your suggested wording or text for the policy:**

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy SH2: Whitely

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Comments as for SH1. In this case the relevant settlements are Botley, Hedge End and Locks Heath and the relevant neighbouring authorities are Eastleigh, Southampton.

Please make sure that you put in all the evidence and information needed to support your representation.

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

As above

**What is your suggested wording or text for the policy:**

New para xi:

***“xi. Provide active travel links to all surrounding communities including Denmead and the South Hampshire urban area (Botley, Hedge End, Locks Heath) and make connections to the active travel network defined in the Winchester District LCWIP as well as the LCWIP networks of neighbouring authorities including Southampton and Eastleigh.”***

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy NA1 The Dean

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.

Very weak on access. No indication of what off-site improvements might be necessary. The area round the West St/The Avenue junction is an obvious example: development off the Dean is bound to have a major effect on traffic at this junction, which is already hazardous for cyclists. However without any indication of specific areas, developers will be able to get away with little or no contribution (as has already happened at Sun Hill).

Again, the district LCWIP should be referenced.

Please make sure that you put in all the evidence and information needed to support your representation.

**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:**

*“iv. Provide safe vehicle, pedestrian and cycle access from The Dean, **provide links to the network defined in the Winchester District LCWIP** and contribute to any off-site junction, **cycle route and** ~~or~~ pedestrian improvements necessary, **including West Street and the Avenue.**”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

Policy NA2 Sun Lane

**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Fails on being effective and consistent with national policy.

**Para v:** Again, should make it clear that “access” limits described here apply only to motor vehicle access, not active travel access.

As for NA1 above, the requirement to provide “off-site” improvements for pedestrian and cycle travel is far too vague and open to abuse. These need to be outlined and linked to the District LCWIP.

Please make sure that you put in all the evidence and information needed to support your representation.

**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:**

*“v. **Motor vehicle** access to the site should be primarily from the south...”*

*“viii. [...] This should include off-site vehicle, pedestrian, cycle and public transport improvements **both to and through the site**, to be provided or funded by the development **in accordance with the District LCWIP and the requirements of this Plan’s Transport policies.**”*

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

**KW2: Land adjoining the Cart & Horses PH**

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

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.

Please make sure that you put in all the evidence and information needed to support your representation.

**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:**

*“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..** “*

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

- Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
- No, I don't want to take part in a hearing session