

Sir John Moore Barracks - Local Plan Representations – Regulation 19

- 1.1 Avison Young is instructed by Defence Infrastructure Organisation (DIO) to prepare and submit a response to the “Regulation 19” version of the emerging Winchester Local Plan. DIO owns the Sir John Moore Barracks (SJMB) site, on the northern edge of the urban area of the City.
- 1.2 Our representations make reference to the page and paragraph numbers used in the Reg 19 consultation draft. Our suggested/requested additions and omissions to the Reg 19 draft follow the convention in respect of amendments to draft Local Plans. Suggested/requested additions are identified in red text and italics. Suggested/requested omissions are identified by “striking through” the existing text.

Policy W2 (Site Specific Policy – Sir John Moore Barracks)

Housing Allocations: Sir John Moore Barracks

- 1.3 DIO strongly supports the inclusion of Policy W2 within the Reg 19 Local Plan. This policy relates specifically to the Sir John Moore Barracks (SJMB) site and allocates/establishes requirements for its future residential-led development, to deliver between 750 to 1,000 homes. The overall approach set out in Policy W2 will help to ensure that this key and significant previously developed landholding is suitability and sustainably planned for in the future and makes effective use of land in accordance with Paragraphs 11a and 123 of the National Planning Policy Framework (NPPF) (2023).
- 1.4 The SJMB site will become surplus to military requirements from 2026, when operational output ceases and DIO remains keen to continue to work collaboratively with Winchester City Council (WCC) and other stakeholders to deliver development on the site.
- 1.5 DIO recognises that it would be appropriate to bring forward the development as part of a site-wide masterplan led approach commensurate with the level of housing to be delivered. Notwithstanding this, we would like to make the following comments on the current draft policy, all of which are geared towards ensuring that Policy W2 is ultimately prepared as soundly as possible in accordance with the NPPF test of soundness.
- 1.6 Page 313 of the Reg 19 plan states that the allocated use of the site is for mixed use and park and ride – we request the following changes are made to clarify the nature of the allocation:

Allocated Uses:

- I) ***Residential led*** mixed use, ~~and~~
- II) Park and ride ***car park*** ~~facility~~

Policy W2: Policy Wording

1.7 There are four elements of Policy W2 that require significant amendment:

- i) Comprehensive Site Wide Masterplan
- vii) Access of Andover Road
- xvii) Existing gym, leisure facilities and swimming pool
- xix) Park and Ride facility

1.8 **Part i) Comprehensive Site Wide Masterplan**

- 1.8.1 **Part i)** of the policy requires that any application for development is preceded by, and consistent with, a comprehensive site wide masterplan (informed by relevant evidence base reports and assessments) which demonstrates how high-quality design, green spaces and settlement gaps will be delivered for the whole site which has involved and engaged with stakeholders and interested parties before it is **agreed** [our emphasis] by the local planning authority.
- 1.8.2 This draft policy does not identify the mechanism by which this masterplan should be ‘agreed’ by the council in its capacity as Local Planning Authority, and we request that WCC needs to clarify what it means by ‘masterplanning process’.
- 1.8.3 We request the following amended wording is introduced:

*i) Any **planning** application ~~for development is preceded by, and is proposing redevelopment of the barracks should be supported by a~~ consistent with a comprehensive and evidence based site wide masterplan which demonstrates how high quality design, green spaces, and settlement gaps will be delivered **relating to** ~~for the whole site. The preparation of a site wide masterplan should include~~ which has **the involvement and engagement** ~~involved and engaged with relevant~~ stakeholders and interested parties ~~before it is agreed by the local planning authority~~*

1.9 **Part vii) Access off Andover Road**

1.9.1 We note the requirement, at **part vii)** that the site access should be off Andover Road – this should be referenced as Andover Road/North as the precise boundary of the road name change for the road corridor is uncertain. To avoid ambiguity and provide clarity of intent, we request the following amended wording is introduced:

*vii) Access should be off Andover Road/**Andover Road North***

1.9.2 We also note that the WCC’s Strategic Transport Assessment (STA) (August 2024) analyses strategic traffic flows in the Andover Road/Andover Road North corridor and considers potential traffic impacts from new development, such as at SJMB, together with an assumed rate in the increase in background traffic growth. That analysis (see para 6.16 of the STA) then models anticipated traffic flows using the junction design for Andover Road/North and Harestock Road that was approved (at appeal) as part of

the grant of planning permission for the “Kings Barton” estate in 2012. The approved junction facilitates the diversion of Andover Road North through the new Kings Barton scheme. The Kings Barton development is well advanced and numerous dwellings are occupied. However, the approved junction has not yet been constructed.

1.9.3 We are aware that Cala Homes (the developers of Kings Barton) and Hampshire County Council are discussing potential changes to the approved junction design. These changes could result in a reduction in the capacity of this junction, to the extent that the revised junction layout may not be able to satisfactorily accommodate future traffic flows arising from the development of SJMB/background traffic growth to the detriment of the future free flow of traffic in the local network. Of particular concern to DIO is the impact of changes to the southbound right turn capacity into Harestock Road.

1.9.1 The approval, or implementation, of a revised junction design with less capacity than the design currently approved would seem to potentially undermine WCC’s transport evidence base (traffic/movement flow analysis) that underpins the emerging Local Plan. **The potential implications of this for the soundness of the plan are significant.** Therefore, any change to the approved Andover Road North/Harestock Road junction design should be subject to public scrutiny through the seeking of a S.96a/S.73 application to propose any changes to that previously approved junction design as the matter is not solely one of detailed design and implementation in Highway terms of the ‘approved junction’ and has consequential implications.

1.10 **Part xvii) Existing Gym, Leisure Facilities and Swimming pool**

1.10.1 DIO is undertaking a review of the potential re-purposing of the existing swimming pool/gyms to create a new ‘sports complex’ or otherwise securing its potential reuse – this review is exploring the technical feasibility of adapting (and possibly extending) the existing buildings (which is likely to require a new power supply and heat plant) and is also assessing the viability associated with the conversion (and possible extension) costs in the context of identifying market/operator demand and also considering the future operational costs associated with running a sports complex This ‘Sports Complex’ review is not anticipated to be completed to inform the submission of an outline planning application to propose the redevelopment of the SJMB site and accordingly the area for the potential ‘sports complex’ will be excluded from that application/application site. In the event the ‘sports complex’ is technically feasible and viable to deliver it will come forward as a separate planning application.

1.10.2 In view of the above on-going review, in relation to **part xvii)** the following changes are recommended:

*xvii) The proposals include an assessment of the condition, age and the **need technical feasibility/viability to demonstrate the ability to retain/refurbish/redevelop, viably operate/** incorporate the existing gym, leisure facilities and the swimming pool as part of the wider residential led scheme. ~~Depending on the outcome of this assessment if they are viable, they should be opened up for use by the local community and management plan should accompany any planning application for this part of the site.~~ **If the assessment has not been completed to inform/be included at the time of the submission of an initial planning application to propose the redevelopment of the Sir John Moore Barracks site, then land to accommodate the potential ‘sports complex’ shall be excluded from that application site boundary and be bought forward at a later date (but for that later application to be informed by pre-application consultation with the Council).***

1.11 **Part xix) Park and Ride Facility**

- 1.11.1 **Part xix)** of the policy establishes that the proposals should include a Park and Ride facility, of approximately 850 spaces, and states that the facility should be operationally connected to the 200 Space 'Park and Ride Light' at Kings Barton. Part (xix) also states that the scale and location of the Park and Ride site **should be determined** (our emphasis) through the 'masterplanning' process.
- 1.11.2 DIO supports the City Council's aspiration for the delivery of a Park and Ride car park to the north of Winchester. DIO welcomes the aspiration to promote sustainable travel modes in general throughout the City. DIO has engaged with Winchester City Council from announcement of the planned closure of SJMB as to the opportunity the SJMB site offered, and agreement to the principle of the siting of the Winchester Movement Strategy requirement for a northern approach Park and Ride facility within the site.
- 1.11.3 DIO has confirmed its willingness for the principle to include a multi-storey Park and Ride car park in its redevelopment proposals and through masterplan optioneering a suitable land parcel has been identified for use as a multi-storey Park and Ride car park. That location is in principle acceptable to the operational requirements of Hampshire County Council/Winchester City Council who will take forward development of this new public infrastructure.
- 1.11.4 A Park and Ride 'facility' is not required on the site to make the SJMB redevelopment proposals acceptable in planning terms. However, the aspiration to deliver and operate a north Winchester Park and Ride facility stems from the City Council's wish to address existing traffic congestion problems in the centre of Winchester. This is set out in the "Winchester Movement Strategy" and is reiterated in other parts of the text that accompanies draft policy W2.
- 1.11.5 As a result, it is also not appropriate for the Local Plan to include a requirement for an operational link between the two park and ride facilities. DIO will not be involved in the delivery or operation of the Park and Ride car park – this car park is not required to make the redevelopment of the SJMB site acceptable in planning terms. The inclusion of a requirement for an operational link is unjustified and unreasonable.
- 1.12 Furthermore, it is not appropriate for the Local Plan to include a requirement that the scale (i.e. the number of park and ride spaces) of the park and ride should be determined as part of the masterplanning process. The park and ride car park is not needed to make the redevelopment of the SJMB site acceptable in planning terms. Accordingly, scale is a matter for the City Council, Hampshire County Council (HCC) and other relevant stakeholders to take forward. DIO has taken the required capacity (of up to 850 spaces) at face value, an 'up to capacity' informed by HCC as an appropriate sized facility and DIO will reflect this size in a future planning application. The location of the multi-storey Park and Ride car park within the SJMB Concept Masterplan has been agreed in principle by HCC, we will therefore include the Park and Ride in this location at the planning application stage. A multi-storey car park solution is needed to accommodate up to 850 spaces as there is insufficient land in SJMB in the right location for a surface level solution for up to 850 spaces.
- 1.12.1 The identification of a site for a Park and Ride scheme would contribute towards Winchester City Council's strategic objectives of promoting sustainable travel in the city, as set out in the "Winchester Movement Strategy Feasibility Studies – Phase 2 Summary Report" (2021) and prioritises securing funding from Central Government under this strategy by Winchester City Council and Hampshire County Council for new park and ride provision in the Andover Road corridor.

1.12.2 Accordingly, we recommend that part **xix)** states the following only:

***xix)** The proposals include **land for a multi-storey Park & Ride car park** of approximately **for up to** 850 spaces ~~that would be in addition to and would need to be connected operationally to the 200 space Kings Barton Park & Ride light~~. The location of the Park & Ride **facility to include the provisions of electrical charging points and cycle parking** facilities should be determined through the **site wide** masterplanning process and ~~transport assessment~~ include the provision of electrical charging points and cycle parking facilities*

1.13 Associated changes to the Reg 19 supporting text (para 12.29) in relation to park and ride matters can be found below at our para 1.32 below.

1.14 Further minor changes are requested in relation to parts ii), iii) and xvi) of Policy W2 to make it sound as set out below.

1.15 In respect of **part ii)**, the following changes are requested to clarify the nature/scope of an application submission to create sufficient flexibility for more than one planning application being able to be submitted to propose the redevelopment of the barracks:

***ii) A single planning application covering** ~~The proposals relate to the whole of the allocated site~~ **is preferred.** ~~or, if~~ **If a planning application covers part of the site only** ~~less,~~ **the proposals should** ~~do not~~ in any way prejudice the implementation of the masterplan **vision** for the whole site.*

1.16 In relation to **part iii)** a minor change is recommended as the number of local centres within the SJMB masterplan is not yet known:

***iii)** The proposals include a phasing and delivery strategy that is related to the provision of infrastructure and the creation of neighbourhood centre(s) with ancillary and supporting uses.*

1.17 With regard to **part xvi)** in relation to the retention of the Chapel building, details for its re-use are not currently known and therefore a minor change is proposed to delete reference to future community use as follows:

***xvi)** The proposals **include an assessment of the condition, age and the technical feasibility/viability for the retention of** ~~retain~~ the existing Chapel ~~and opens this up to the community as part of any new development, as this will~~ **which may help** to reinforce links to ~~the Peninsula Barracks and~~ historical military associations with Winchester.*

Policy W2 Supporting Text

1.18 As a result of the proposed changes to Policy W2 above, we request a small number of associated changes should be made to the supporting Policy W2 text to either clarify ambiguities or correct factual errors, or in the interests of soundness as set out overleaf.

- 1.19 **Para 12.15** – clarification is needed regarding the status of the ‘master planning process’ to be carried out in advance of the submission of a planning application as outlined above. DIO is engaged in the preparation of a Concept Masterplan (CMP) and is working with officers from WCC in this regard. The CMP exercise has involved extensive engagement with the local community and other stakeholders. DIO’s understanding is that the Council will consider the transparency and robustness of the CMP preparation process only in advance of the submission of a planning application.
- 1.20 **Para 12.15** – we maintain that the whole of the SJMB site falls within the definition of previously developed land (PDL) that is set out in Annex 2 to the NPPF (2023). The open training areas, woodland and all other parts of the site are used in association with the overall use of the site for military training. The woodland was planted and the barracks constructed as a military training environment as part of the development of the site 1983-1986. The NPPF definition of PDL establishes that it includes buildings and their curtilage. Case law and appeal decisions establish that the curtilage of a building(s) includes all surrounding land that is in the same use. References to only part of the site comprising PDL are inaccurate (similar changes will need to be made to **para 12.26**).
- 1.21 **Para 12.18** – reference is made to the main SJMB access being off Andover Road North whilst part vii) of Policy W2 refers to Andover Road – we request reference is made to Andover Road/North. We have recommended that this be amended to refer to “Andover Road/North”.
- 1.22 **Para 12.20 – 12.22** – it is important to note that any potential impacts relating to nitrates and phosphates relates to a redevelopment scheme must be considered on the basis of the ‘net’ potential impacts arising over and above those arising from existing military operations.
- 1.23 Additional Wastewater Treatment Works permit upgrades are associated with the Levelling Up and Regeneration Act (LURA). The LURA places a legal obligation on water and sewerage providers to upgrade WwTW with a greater than 2,000 population equivalent (PE) to the highest Technologically Achievable Limit (TAL) by 2030 for both phosphorous and nitrogen, which is enforceable via the provisions of Section 18 of the Water Industry Act, 1991.
- 1.24 A land use budget was prepared based on previous masterplan comparing baseline land and water use against potential future land and water uses. This remains to be refined as DIO’s emerging draft masterplan and land uses evolve and in consultation with Natural England.
- 1.25 An updated nutrient neutrality assessment was undertaken (June 2024) using the latest nutrient neutrality metric and an indicative version of a masterplan (assuming 919 units) in order to provide assurance for the scheme given change in calculation metric and impact of Phosphorous. In summary that updated June 2024 assessment (based on 919 units) indicates that there will be no need for on-site mitigation post 2030 and no need for pre-2030 for mitigation up to a threshold of 669 units. This assessment is subject to Natural England needing to agree budget calculations. A further budget update will be completed as part of preparing an OPA to propose the redevelopment of the SJMB site.
- 1.26 **Para 12.23** – refers to the settlement boundaries for Winchester and states that the settlement boundary which currently excludes the SJMB site will not be extended to include the SJMB site until the extent of the developable area is known. Several paragraphs in draft Policy W2 confirm that the allocation relates to the whole of the SJMB site. There appears no valid planning reason not to support the inclusion of the SJMB allocation as being within a settlement boundary at this point in time.
- 1.27 We request that the settlement boundary should be altered to include all of the proposed allocation at SJMB (see section in relation to Policies SP3 and H4 below).
- 1.28 **Para 12.25** – this paragraph refers to a nursery which is being used occasionally by the public which is incorrect as the SJMB site does not contain an operational nursery as this closed some time ago.

- 1.29 **Para 12.26** – see para 1.8 above in respect of ‘masterplanning’ matters.
- 1.30 **Para 12.26** – reference is made (as also in para **12.27**) to part of the SJMB allocation being located in a settlement gap. On the basis Sir John Moore Barracks is to be an allocated site the Settlement Gap plan must now be amended to provide sufficient flexibility for the masterplan to be delivered whilst respecting a new settlement gap that is yet to be determined. A suggested settlement gap plan is shown below, and the policy should allow flexibility for refinement to accommodate the masterplan being bought forward. The existing built-up areas (including associated curtilage/roads/infrastructure) should be excluded from the settlement gap (particularly in view of Policy W2 part iv) which seeks to focus redevelopment on part of the barracks site which is currently located within the Littleton Settlement ‘gap’) – see our comments in relation to Policy NE7 below.
- 1.31 **Para 12.27** – see para 1.8 above.
- 1.32 **Para 12.29** – in respect of the Park and Ride, we request the following changes are made to clarify the nature of this part of the SJMB allocation:

*“As the site is located on one of the key radial routes into the city centre (Andover Road), the City of Winchester Movement Strategy has identified that there is need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need to provide a car park on the north side of the city. In order to meet this need, there is an opportunity, as part of the comprehensive redevelopment of this site, to **allocate land within the masterplan for up to an 850 multi-storey space Park & Ride car park**. This would be in addition to the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road which would need to be operationally connected to the Park & Ride facility at the Sir John Moore Barracks site (Policy W1). The scale and location of the **multi-storey Park & Ride facility car park** should be considered as part of the master planning process and be in a location that is physically connected to sustainable modes of transport and **capable of providing** ~~provide~~ **electrical** charging points **and cycle parking**.”*

Other Reg 19 Policies

Policy SP3

- 1.33 We note the approach in Policy SP3 to direct development within settlement boundaries and that land not within a settlement boundary is defined as countryside.
- 1.34 Whilst we welcome the Reg 19 changes regarding the reference to this policy not being relevant to Reg 19 site allocations, such as at SJMB (Policy W2), the continued designation of the SJMB site as countryside appears unnecessary and illogical if Policy SP3 is irrelevant to the Policy W2 SJMB site allocation. **We request that the SJMB site allocation is excluded from its current countryside designation in the Reg 19 policy map.**

Policy NE5

- 1.35 We support the approach within Policy NE1 to enhance and protect the natural environment and biodiversity and note that the supporting text to this policy refers to the Environment Act requirement to deliver a Biodiversity Net Gain of 10%. We note that the supporting text to this policy references the Defra Biodiversity Metric. However **we consider that it would also be useful to clarify this within the policy wording** which we request is amended as follows:

“The Local Planning Authority will permit development that maintains, protects and enhances biodiversity across the district, delivering a minimum of 10% measurable net gain in biodiversity to be maintained for a

*period of 30 years in accordance with the Environment Act, **as calculated using the Defra Biodiversity Metric***

Policy NE7

- 1.36 We support the approach within Policy NE7 to retain the open and undeveloped nature of defined settlement gaps but note that this policy establishes a policy presumption against large scale development within them. The “Littleton Gap” includes around a third of the SJMB site (to the south of the SJMB site) which already contains numerous substantial buildings on it with the extent of the gap seemingly being based on an arbitrary boundary which cuts across part of the SJMB built up area without regard to any logical topographical or infrastructure (such as roads) features to define the edge of the ‘gap’ there.
- 1.37 **We request that a new Settlement Gap is drawn** and DIO would be pleased to discuss and agree an amendment to the gap with officers from WCC in due course. The existing green infrastructure to the western SJMB boundary with Littleton, and to the southern SJMB boundary (including an existing SINC) with Harestock could be retained to continue to perform a buffer function to these adjoining settlements. Our proposal is illustrated on the attached plan at **Appendix A**. The proposed revisions would correctly align the policy framework to the allocation site, and provide appropriate policy function to maintain an appropriate settlement gap with Littleton drawn to appropriate features and characteristics of the site.
- 1.38 As a minimum, the settlement gap should be amended to remove the part of the site that already has numerous large substantial buildings on it.

Policy NE14

- 1.39 We note the approach within Policy NE14 which seeks to protect the rural character of the countryside within the District. **We request that the settlement boundaries should be amended to permit all of the SJMB allocation site and that the SJMB site is excluded from the current ‘countryside’ designation in the Reg 19 policy map.**
- 1.40 However, if the SJMB allocation is not to be included within a settlement boundary, we consider that Policy NE14 should be amended to ensure that there is no conflict with Policy W2. In our view, achieving the requirements of Policy NE14 would be challenging whilst delivering a large-scale residential masterplan for the site, in accordance with Policy W2. The wording of Policy NE14, first paragraph (P.173) should be amended as follows:

*“Outside defined settlement boundaries, **the Council will support development within the Countryside where this accords with Site Allocations within this Plan. For land that is not allocated for development,** ~~development~~ proposals outside defined settlement boundaries which accord with the Development Plan will be permitted where they do not have an unacceptable effect on the rural character of the area, by means of visual intrusion, the introduction of incongruous features, the destruction of locally characteristic rural assets, or by impacts on the tranquillity of the environment.”*

Policy NE15

- 1.41 We support the approach within Policy NE15 to protect special natural features and their setting, to retain visual amenity, biodiversity and heritage value. However, for clarity **we consider that additional definitions should be provided** (either within the supporting text to this Policy, or within the Local Plan glossary) to ensure that the policy is effective.
- 1.42 We consider the following definitions should be amended/added:

- Paragraph 7.107 should make a distinction between 'Ancient Woodland' (which should also be capitalised in the policy text) and trees of significance. Ancient Woodland is defined within the NPPF as follows and this Paragraph should include this definition i.e.: *"An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)".*
- Paragraph 7.107 should include a specific definition of 'special trees' which, in our view, should be defined as *"Trees protected by a Tree Preservation Order"*.
- Paragraph 7.108 should include a specific definition of 'important hedgerows' which should refer to the Hedgerow Regulations definition.
- A specific definition should also be included for "distinctive ground flora" which, in our view, should be defined as "typical woodland ground flora assemblage that is associated with the Ancient Woodland and Important Hedgerows".

Policy D5

- 1.43 We support the approach within Policy D5 to ensure that large scale development proposals deliver sustainable development and high-quality place making. However, we have some detailed comments on Policy D5 which are geared towards ensuring that there are no conflicts between this policy and the site-specific SJMB policy (W2).
- 1.44 As per our comments on Policy W2, the policy is not currently clear as to the mechanism by which this masterplan should be secured by the Local Planning Authority and we consider that wording should be added to clarify that this can be agreed through a planning application process in due course.
- 1.45 **We request the following amended wording is introduced to Policy D5 (p99) 3rd paragraph:**
- "Any application for significant development on sites occupied by major landowners/users should be ~~preceded~~ **accompanied** by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development **and be informed by pre-application engagement with the Local Planning Authority:**"*
- 1.46 Further to para 1.45 above, we suggest that if WCC were to clarify what it means by 'masterplanning process' as meaning the Concept Masterplan process it introduced in 2023; then a further amendment for the output (as defined in that process) and where available, should form part of the evidence base could be considered?
- "Any application for significant development on sites occupied by major landowners/users should be ~~preceded~~ **accompanied** by, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development **and be informed by pre-application engagement with the Local Planning Authority and any output of the Council's Concept Masterplanning process:**"*
- 1.47 As per our comments on the site-specific policy for Sir John Moore Barracks (Policy W2), **we also consider that part xv) of this Policy D5 (p100) should be reworded** to ensure it is compliant with national and local policy as follows:
- "xv) Demonstrate a good understanding and respect for the natural environment, its heritage assets and their setting both within the site and in the wider locality, whether designated or not, and include details of how the natural environment and heritage assets will be preserved, conserved ~~and~~ **or** enhanced. **Any applications should be accompanied by a heritage statement describing the significance of affected***

heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm.”

Policy D8

- 1.48 We support the approach within Policy D8 to ensure that development which is known or suspected to be contaminated will only be permitted where there will be no unacceptable impacts on human health or the wider environment. However, **we request that Policy D8 should be reworded** to clarify that site investigations and risk assessments can be secured as part of planning conditions. In our view, this is a standard approach and conditions can also secure remediation of any unexpected contamination which may be found.
- 1.49 We request the following amendment should be made to the policy D8 part iii (P.106):

*“iii. All site investigations, risk assessment, remediation and associated works are undertaken in line with current government guidance and industry best practice guidelines. All assessments must accompany planning applications **or be secured by planning condition** and where further assessments are required they will be secured by planning condition.”*

Policy NE2

- 1.50 We note that a specific policy has been included within the Plan which is supportive of the retention and development of existing major commercial, educational and MOD establishments that occupy rural locations in the district, where this will help them continue to contribute to the district’s economic prosperity. We are supportive of this approach.

Policy H4

- 1.51 Policy H4 addresses policy matters promoting new development within settlements/settlement boundaries as defined in the Reg 19 policy map. In similar circumstances to our requested changes to Policy NE14 above, the SJMB allocation should be included within a settlement boundary, and included as a settlement listed in Policy H4, **we consider that Policy H4 should be amended to ensure that there is no conflict with Policy W2**. In our view, achieving the requirements of Policy H4 would be challenging whilst delivering a large-scale residential masterplan for the site, in accordance with Policy W2.
- 1.52 Our requested changes are as follows to Policy H4, 1st paragraph, and settlement group labelled A (p.223):

*“Development that accords with the Development Plan will be permitted in the following groups of settlements **or in Site Allocation areas**:*

*“A. Within the defined boundaries of the following settlements, as shown on the Policies Map: Bishop’s Waltham, Colden Common, Compton Down, Denmead, Hursley, Kings Worthy, Knowle, Littleton, Micheldever, Micheldever Station, New Alresford, Old Alresford, Otterbourne, **Sir John Moore Barracks**, South Wonston, Southdown, Southwick, Sparsholt, Sutton Scotney, Swanmore, Waltham Chase, Whiteley, Wickham, Winchester Town.”*

Avison Young 11.10.24

Appendix A

Illustrative Only

