

Privacy and publication

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(Required)

About you

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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)

WK1 para 14.110

Do you consider the supporting text and policy are:

(Required)

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

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Please give details to support your answer above: Please be as precise as possible

I.14.110 "...which includes the provision of new sports pitches and pavilion on land in the same ownership to the east of Mill Lane. This provision is necessary to help meet part of the open space requirements for development and to improve the amount and distribution of available sports grounds."

II. The Winchester Playing Pitch Strategy (WPPS) does not support this project. The WPPS makes no mention of this site as a future sports facility. It was not therefore included in its assessment of future provision. Yet, even without this site, table 1.2 page 15 of the WPPS clearly states that future need in Winchester South District for new adult 3G or grass football pitches will not be needed – indeed there is overcapacity. There is a minor shortfall in youth grass 11v11 and 9v9 and mini 5v5 capacity. This shortfall could all be satisfied by existing pitches at Knowle Green within the Wickham and Knowle Parish – pitches that are currently underutilised despite the projected shortfall of capacity.

III. Sports site provision at this site contravenes the following policies:

NE8: South Downs National Park: (p 160) "Development in close proximity the South Downs National Park will only be permitted where it would... enhance the intrinsic quality of dark night skies and the setting of the National Park. Development proposals in close proximity to the South Downs National Park are expected to take account of the National Park assessments of landscape and tranquillity and demonstrate how a proposal conserves and enhances the special qualities of the Park" (including impact on Dark Skies)

NE: 13: Leisure and Recreation in the Countryside:

(7.100, p 170) "As well as visual intrusion, there may be issues of noise and light pollution, or disruption to the rural setting caused by increases in the amount and type of traffic and patterns of travel. In these cases, detailed information will be required as to the nature and degree of the effects"

NE 14 (p 171): Rural Character: 7.105 "Traffic intrusion may adversely affect the character of the area due to numbers of trips and the type of vehicles (e.g. heavy goods vehicles). The suitability as well as the capacity of rural lanes should also be considered, as physical re-modelling of rural roads and introduction of signage, visibility splays and entrances necessary for the development may have an unacceptable impact on the landscape and rural character. Rural lanes are a particular characteristic of the district that have historic as well as landscape significance"

P 173: "Tranquillity – developments should not have an unacceptable effect on the rural tranquillity of the area, including the introduction of lighting or noise occurring as a result of the development, taking account of the relative remoteness and tranquillity of the location. New lighting will generally not be permitted in unlit areas and the type, size, design and operation of any lighting may be controlled where necessary by the use of conditions."

"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"

IV. The location was subject to a Hampshire Highways holding objection when the nearby surgery expanded (see letter in documents on planning portal ref 20/01484/FUL): the Planning Committee at the time were rebuked by the Local Government Ombudsman for failing to consider the objection. (Letter dated 25/03/21 ref 20 011 720). The reasons for the Highways objection still apply

V. The site was initially promoted by the Parish Council without prior consultation with residents

VI. A Master Plan was drawn up by a consultant that comprised a 3G adult football pitch and

junior pitches. The Master Plan was put out to resident consultation in Spring 2022 and was rejected by 80% of residents (192 respondents). Ref: <https://onedrive.live.com/view.aspx?resid=0CCB2552E26886CC!258124&cid=ccb2552e26886cc&authkey=!AC1xfS3MOCdOchl&CT=1728555591698&OR=ItemsView> Note: sub analysis of the responses, eliminating those post codes not within the parish was not published by the Council but the sub analysis can be provided showing 80% rejection)

vii Locational conditions do not meet criteria for a successful football hub: poor access (narrow, rural country lane and narrow country lane feeder roads – Parish Council response 2022 included in your Development Strategy and Site Selection evidence paper Site clearly states no access direct onto Mill Lane)); no public transport within 400-500 metres; no safe pedestrian access across the road; no club making its home at the site

vii In Autumn 2023 the Parish Council conducted surveys of local sports clubs and the local primary school to determine their potential use of facilities at the site. Ref: <https://wickhamparishcouncil.org/mill-lane-recreation-facilities/>. Information from the surveys was fed into a financial viability analysis with advice and oversight of the originally commissioned expert consultancy: the conclusion was reached that no sports pitch solution at the site would be financially viable, either as to capital or ongoing operational requirements. The findings were shared with WCC in Spring 2024.

viii An alternative use of the site as a country park (not accessed from Mill Lane by vehicular traffic) has been proposed by the Parish Council and shown to be financially viable and is likely to receive strong majority support by residents including WRA's 280+ members. A costed plan illustrating the nature and financial viability of a country park has been completed by a landscape consultant expert in the field. The information has been incorporated into an analysis of country park v sports pitches for the site and is, at the time of writing, understood to be pending the Parish Council's review.

ix The alternative use for the site proposed by the Parish Council will give greater BNG, be more acceptable to the adjacent SDNP, alleviate traffic intensity that will affect the rural Mill Lane, provide informal recreation space to the settlement, provide the desired pedestrian and cycling access to the Meon Valley Trail

X An alternative site in the parish may be made available for sports pitches at W124 that is supported by the Parish Council. This site, unlike the proposed Mill Lane sports site, has not been subject to the necessary resident consultation to ensure soundness, but if it were to be and found acceptable to the majority of residents it would much better serve the sports pitch needs of the settlement and be more consistent with all the policies and criteria that the Mill Lane site fails to satisfy (see entries re Settlement Gap WK 3)

Grounds for Objection:

NOT POSITIVELY PREPARED: plan fails to consider WCC's own evidence of area's objectively assessed needs; is not a financially sustainable development; contradicts the provisions of policies NE8, NE 13, NE14; local consultation rejection of the planned provision

NOT JUSTIFIED: there is better and more sustainable alternative use of the site in compliance with policies NE8, Ne 13, NE14; alternative use has support of residents; cannot be financially justified. If WPPS update calls for more pitches in Wickham an alternative site should be sought.

and include any paragraph/policy numbers that your comments relate to. (Required)

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?

The policy is based on a prior iteration of the Local Plan and needs to be changed based upon the evidence above to make it sound. It should reflect the work done by Wickham and Knowle Parish Council that did not find its way into this Regulation 19 Plan. It should reflect past consultation data that does not support Sports Pitches, together with the fact that there is an alternative that has support and is financially viable. And, that is sports pitches are needed they can be provided at an alternative and more suitable development site (Welborne Open Space – see separate submission on this subject.)

What is your suggested wording or text for the policy:

“The s106 allocating this site to Sports Pitches has been varied to alter its permitted use from Sports Pitches to Country Park following investigative financial and consultative work by the Parish Council and agreed by WCC”

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?

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- Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
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WK3 Pages 459 – 460

14.115 "Green buffers are provided to ensure that Welborne does not coalesce with Wickham or Knowle.

It is also necessary for this Plan to define the general extent of open land within Winchester district which should be retained as a gap between Welborne and these settlements. It may be possible to accommodate some natural green infrastructure on land within Winchester district, provided it does not include buildings and maintains the open and rural character of the land and enables its long-term management to be secured.

The overriding requirement is to retain the open rural nature of this land and to prevent changes which would urbanise its undeveloped character. The uses and management of the area must help to secure an effective, viable and long-term gap between Welborne and the separate settlements of Knowle and Wickham."

Observations:

- I. This site is a major part of the green buffer between Wickham and Welborne. A development proposal has been put forward for development at the northern margin of the settlement gap (SHELAA reference W124)
- II. WRA, on record, and residents of Wickham have consistently supported the need for and maintenance of the green buffer in the past. Nothing has changed to alter that position and if any movement to propose houses as in W124 is to be considered it must demonstrate that it has the majority support of residents. At the time of writing the only evidence to support sites in the parish was conducted in 2022. Now that this is the final Local Plan before it goes to the Inspector if site W124 is to be considered it, like the other sites, should be subject to robust resident consultation.
- III. The extent of the WK3 site makes a considerable contribution to the land area of the buffer, and so it is possible to see an argument that development might be allowed within the terms of Policy "NE7 Settlement Gaps"
- IV. The potential development in WK3 (SHELAA reference Mayles Lane W124) has been put forward for 100 homes plus sports pitches at the northern boundary of the site adjacent to the village boundary. The proposal adds community benefits that the proposed sites in the Plan

(WK5 and WK6) do not: additional sports pitches and a commitment to deliver to the ownership of the Parish Council a large parcel of open greenfield land in the settlement gap. The danger, as residents see it, to the possibility of erosion of the buffer over time as pressure of further housing development demand is a real concern. Therefore, if W124 were to be adopted for development as described and under the conditions offered by the developer, the potential for the community to ensure that the integrity of the settlement gap can, to a large extent, be maintained and controlled by the community, may be an attractive option for residents and deliver against the goal for settlement gaps “enables its long-term management to be secured.”(145.111). However, residents should be consulted on this important site – and they have not. They will need to be assured that scope creep does not follow and the commitment to parish ownership is legally binding and watertight.

V. Policy NE7 (page 157) states:

“Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted.” The site that is in the ownership of the developer extends to 210 hectares so the amount of green space remaining in the settlement gap that is part of that ownership would be enough to meet this criterion. However, when considering detailed plans, if this site is chosen, it is essential that the developer ensures that as little land as possible is developed for housing and that the impact on neighbouring homes to the north of the site is minimised and/or mitigated and the assurances to the Parish Council are robustly honoured. It is also essential that any development cannot be designed in such a way as to encourage later applications to build on the settlement gap.

V1. 7.6.1 (page 157): “In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.” The development plan put forward for WK3/W124, but not chosen by WCC for inclusion in the Plan, must be shown not to infringe this principle if it is to be considered.

V11. 7.6.2 The Framework states that it will be individual Local Plans that will identify the location of gaps and include policies to set out the types of development which will be permitted, based on the following principles:- It would not diminish the physical and/or visual separation of settlements; and It would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. The landscape vista looking from south to north would obviously change but should still extend sufficiently to maintain the definition of a settlement gap. The proposed W124 development of 100 homes plus sports pitches at the northern boundary of the site immediately adjacent to the village boundary and existing sports and leisure facilities must be shown to provide sufficient land for the green buffer – and meets the requirement that it should comprise “no more land than is necessary”

It might also be relevant to point out that in KN1 page 470 14.137 the following statement might also apply to the proposal for WK3: “The site falls within what is currently designated as a settlement gap under adopted LPP1 Policy SHUA4. However, the planning application, and associated technical evidence, has demonstrated that development of this site will secure a much larger part of the Gap to be safeguarded for the longer term, and in that context the loss of this part of the gap is acceptable.” It is possible that the same argument could be made with respect to the Mayles Lane site WK3/W124, which if approved, could offer the potential to secure another part of the settlement gap between Wickham and Knowle for the long-term. However, the proposed site at WK3 is much more prominent in importance to residents of

Wickham than the site at Ravenswood and so proper local consultation should be made available to determine if there is similar support among residents for development in the gap so close to the boundary. At the very least, to satisfy local opinion, the sites must be “measured” for quantitative support side by side.

V111WK3/W124 includes the only brownfield site in the village and as such justifies consideration in comparison with others that only develop greenfield sites. Ref Local Plan page ii ”This local plan takes the approach of ‘brownfield first’ – both in prioritising the use of previously developed land over green fields, but also in the phasing of development. Over 90% of the sites that developers put forward have not been included in this plan”.

VII The site has a farm access already onto Hoads Hill. This is a busy main road that already has numerous individual residential access points (turning in both directions) on the same side as the proposed access from the site. However, traffic will increase in both directions over time as Welborne is built out and steps that are understood to be planned for managing the traffic increase will have to incorporate the access from the site onto Hoads Hill. It would be preferable, if needed, to make road alterations to facilitate this site rather than those that are proposed at the Mill Lane site (see WRA representation re WK5). Safe entry/exit from the site onto a wide road with ample space for turning in both directions will be needed but should be deliverable. Car park facilities would be feasible as part of the sports pitch provision. Providing such parking would contribute to meeting the needs of the village where parking is considered by residents in the local plan survey of 2020 to be a significant problem. No other provision for additional parking is included in the proposed Local Plan and, if W124 is considered after due consultation, this opportunity should be taken.

VIII Consultation among residents conducted by the Parish Council in 2022 rated W124 as the most preferred for development. We understand that the Parish Council has submitted this data to WCC (but we note that no further update to that consultation has taken place, with specific respect to the Local Plan proposed development sites for housing – and so definitive current views have not been gathered relative to either of the proposed sites WK5 and WK6 – making the Plan unsound).

IX W124 is within walking distance of the settlement and is on a bus route potentially reducing car traffic thus speaking to WCC’s green agenda. These benefits are not offered by the proposed development at WK5 or WK6 or the Sports Pitches site at Mill Lane. If sports pitches are to be included in the Plan for Wickham, then W124 would be a financially, locationally and topographically more viable option than those at Mill Lane WK1 page 455 (see separate representation on the Sports Pitches site at Mill Lane).

X There is potential for this site to be considered the most appropriate option for the village. All three possible sites must be subjected to proper scrutiny.

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

W124 could meet the requirements of the number of houses that the Plan requires. It may be the favoured choice of residents as claimed in the 2022 survey. BUT it does impinge on the sensitive settlement gap and must be subject of resident consultation and affirmation for it to be included. Nevertheless, there are potential benefits that may gain the support of consultees. Neither it nor the proposed development sites in the Plan have been fully objectively assessed by consultation with residents. W124 as an alternative to WK5 and WK6 has not been assessed – as indeed neither have they.

What is your suggested wording or text for the policy:

There is no suggestion for wording.

GROUND FOR OBJECTION: the Plan for development site selection for Wickham has not been professionally prepared and justified and therefore the Plan is unsound.

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WK5/SHELAA site W102

Statement page: 461/2 14.117

"Development could be accommodated without changing landscape character through concentrating development to the south and SW corner of the site, maintaining a buffer to the protected woodland to the west of the site and locating open space on the more elevated parts of the site."

Potential number of units: 40"

Observations

I.14.117 Supporting text: "The site is located to the north of the recently completed housing development at Houghton Way and the Wickham Surgery which in turn are located to the north of Wickham Community Centre." The location is also to the north-east of the primary school and is close to its boundary. The area is already overdeveloped with significant parking and access problems owing to the nature of the facilities located there: none are easily accessible by foot, most visitors arrive by car and there is no public transport. A developer with an interest in this land may argue that the concentration of activity is a benefit: that would indeed be a benefit in a village centre, but not up a narrow country lane. There is no sense in exacerbating problems already experienced in the area and which will only worsen over time as the Surgery is required to take a minimum of 2000 new patients from

the nearby Welborne development that can only reach the Surgery by car. The school roll is also expected to rise.

ii 14.117 Supporting text. “The landscape to the north of the village makes a significant contribution to the distinctive character and rural setting of the village and is likely to be valued for its intrinsic countryside character, beauty and tranquillity. The boundary of the South Downs National Park lies approximately 100m to the north”. The word ‘likely’ is redundant in the above sentence: it is valued but now threatened by further development and the Sports Pitch site designated for the east side of the lane.

lii Policy NE 14 Rural Countryside 7.105 p 171 applies: “Traffic intrusion may adversely affect the character of the area due to numbers of trips and the type of vehicles (e.g. heavy goods vehicles). The suitability as well as the capacity of rural lanes should also be considered, as physical re-modelling of rural roads and introduction of signage, visibility splays and entrances necessary for the development may have an unacceptable impact on the landscape and rural character. Rural lanes are a particular characteristic of the district that have historic as well as landscape significance”. The plan for housing in Mill Lane WK5 relies on a new access road being created across what is greenfield to Mill Lane. The proposal further proposes to widen and reconfigure the lane to allow two-way passing, which is not possible throughout its length at the moment. Equally, to get to Mill Lane from the north requires traffic to travel on one of three narrow country lanes joining that would also need modification. The access from the south via Bridge Street is also not conducive to high volumes of traffic. It is our contention that action to re-model Mill Lane represents a contradiction of NE14 “as physical re-modelling of rural roads and introduction of signage, visibility splays and entrances necessary for the development will have an unacceptable impact on the landscape and rural character”. The intention in the Plan to create another access off Mill Lane (probably almost at the same location as the access from the housing development but on the opposite side) for the proposed sports pitches will doubly offend the policy.

iv 14.117 Supporting Text: “The boundary of the South Downs National Park lies approximately 100m to the north. However, there is scope to mitigate the impact through careful siting and design. Development could be accommodated without changing landscape character through concentrating development to the south and SW corner of the site...”. Such mitigations could be made but they only need to be made at this site. The fact that mitigations are even considered means that by their very existence the houses will change the landscape character and residents may well feel that such changes, however mitigated, may not be sufficient.

v The parish consultation in 2022 regarding sites place this one (W102) lower than either the Glebe (W103) Mayles Lane/Welborne Open Space (W124). (data available from parish Council). It is fully expected by WRA that had a consultation taken place in direct relation to the Local Plan site assessments and allocations this site W102/WK5 would have been the least favoured by a considerable margin. That no in depth consultation has been conducted makes the Plan unsound.

V114.119. “Mill Lane is currently a narrow rural road with relatively low traffic volume. Pedestrian and cycle access should be established at the southern end of the site through to Houghton Way, to link into existing pedestrian facilities”. In the evidence base presented to WCC in respect SHELAA sites, the parish council in 2022 emphasised that, as result of local

consultation in that year no access onto Mill lane from any housing development should be made.

vi WK 5: Access ii.

The proposals include direct, safe and lit, where appropriate, active travel links as part of a strategy that minimises car journeys from the development by providing opportunities for walking, cycling and public transport that is connected to the surrounding area; Access iv: As part of the design process a transport assessment, should consider any improvements to be provided to Mill Lane, as necessary, to accommodate increase in traffic;” Mill Lane has been noted above to be a narrow rural road with passing only possible at certain points. The rural nature of the lane should be maintained as per policy but the southern end of the lane leads to the overdeveloped Surgery and Community Centre area. The traffic survey completed on this part of the lane in conjunction with the Surgery expansion plan (20/10484/FUL) was criticised by Hampshire Highways who issued a holding objection as a result – but this objection was ignored by WCC’s Planning Committee. The Local Government Ombudsman issued a rebuke to WCC for failing to consider the objection. However, the reasons for that objection still apply. It would be impossible to create safe cycle and pedestrian routes without significantly infringing Policy NE 14 by making significant alterations to the lane itself. It is also unnecessary in relation to the building of 40 houses. Inasmuch as those 40 units should be located elsewhere such disruption to and alteration of, the rural nature of the lane, against Policy NE 14, is not necessary and a cost that can and should be avoided,

xi.WK 5 Environmental. “Provide useable and accessible on-site open space in accordance with the approach set out in policy NE3”. Reference to NE 3 does little to support this site allocation. NE 3 refers to the provision of open space in any development: the plan for this site claims that but in fact what it does *is reduce* open space. It is already open space and development will simply reduce it and the landscape benefits that NE 14 seeks to deliver.

xii.Development Strategy and Site Selection. Page 25. The table shows distinctions between the Mill Lane (W102) and other sites favouring Mill Lane on 4 objectives. This is contested inasmuch as for example 11A Objective 1 for Mill Lane (W102/WK5) is rated as likely minor positive for minimising climate change effects whereas W103/WK6 and W124/WK3 are shown to be potential minor negatives in this regard. Yet the factors used to assess the objectives are differentiated only by the number of homes planned for the sites. In other respects W124 for example has a bus route (W102 does not); WK/W103 and WK3/W124 have accessible open space immediately adjacent to them (W102 does not). The potential for adults to walk to work (Objective 2) from W102, W103 and W124 is the same if they work in Wickham but if they don’t the probability of using a car to go to work is likely to be 100% from W102 but possibly less than that from W124 because it is on a bus route YET the score for W102 on Objective 2 is “likely minor positive” but for W103 and W124 it is “likely minor negative”. So this measure seems badly flawed.

A thorough examination of the manner of these assessments is required as they appear flawed. It would have been expected that there should be equivalence or more favour given to W103 and W124 securing the favourable scores and it begs the question as to why they do not.

GROUNDNS FOR OBJECTION:

This development does not meet the soundness criteria: it is NOT JUSTIFIED relative to better alternatives; it is NOT POSITIVELY PREPARED because it ignores the evidence of community opinion, has an outstanding highways objections and the comparative site selection analysis is questionable. It does not meet the test of duty by WCC to co-operate. WCC held a drop-in event at Wickham in September, but that cannot be regarded as a satisfactory consultation, and we can find no report of it in the evidence base supporting the Plan on WCC's Plan website. Quantified evidence of a large sample has not been produced.

There has been no updated consultation on this site.

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

This site WK5 should be removed from the Plan

What is your suggested wording or text for the policy:

This site is considered undesirable and has been withdrawn from the Plan

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

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.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Further information about how Winchester City Council uses personal information can be found on our website at www.winchester.gov.uk/strategies-and-policies/privacy-policy.

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)

[Redacted]

Postcode: (Required)

[Redacted]

5. What is your email address?

Email address:

[Redacted]

6. What is your phone number?

(Required)

Phone number:

[Redacted]

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)

WK6, pages 465 - 468

Do you consider the supporting text and policy are:

(Required)

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

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

This representation is made on behalf of Wickham Residents' Association (WRA) by its elected Committee. WRA has a membership of 283 adult residents of the village of Wickham. WRA's Committee's views expressed in this representation demonstrating that the Local Plan is not sound are based on the Committee's opinion of how members feel and an appreciation of the issues that the Plan raises as to its impact on and acceptability to residents. It has not conducted in the time available a formal survey of members' views. It does not therefore make unequivocal statements backed by the authority its members. **In that respect it joins with the Parish Council in declaring the Plan unsound. Residents of the parish have not been directly consulted on matters affecting the parish which makes it unsound on grounds of not having been professionally prepared because it has not been objectively assessed and not justified because it does not take into account reasonable alternatives that residents may find more acceptable. It fails to meet the duty to co-operate.**

WK6/SHELAA SITE REFERENCE W103

14.122 (p 465) Supporting Text. "The site lies to the east of the recently developed site at The Glebe. The site is not prominent from public viewpoints and well concealed within the wider landscape due to topography and trees."

Indicative allocation 60 homes

Observations

- i. This site is larger than the recently developed site west of it , Wykeham Vale (which comprises 82 dwellings) and should therefore be capable of hosting all the 100 homes that WCC in April 2024 informed the parish council would be required. The site has been assessed as having a potential housing capacity of 131 units (ref: Report to Wickham Parish Council Full Council 28th July 2022). Assuming this is the case, the site has sufficient capacity to meet the whole Plan requirement for homes in Wickham parish, this removing the need for the unacceptable site at Mill Lane (WK5) to be included.
- ii. 14.124: "Motor vehicle access to the site W103 site would need to be gained via Grindall Field. Development proposals will need to demonstrate that this access is able to serve the additional development or provide sufficient improvements. Proposals will need to ensure there are appropriate walking and cycling links through The Glebe, and on to Wickham village centre and beyond." This will be essential. These infrastructure modifications should have been completed as part of the Wykeham Vale development but were not. The developer this time MUST provide these safe routes. At the same time steps

must be taken to re-model the roundabout at the bottom of Hoads Hill. Already it is proving poorly equipped to manage traffic volumes. SpeedWatch data gathered by WRA's accredited team demonstrates that traffic speeds in School Road (A32 north of the Hoads Hill roundabout) demonstrate a high level of speeding. The pedestrian crossing at the roundabout is informal and precarious, traffic travelling south only looking to the right and not to pedestrians crossing from the left. As traffic volumes using the roundabout increase with traffic from Welborne and the proposed development at WK6 these concerns will multiply in significance.

- iii. 14.126: "The nearby site at The Glebe contained to the north west significant archaeological remains. Further archaeological evaluation of the site will be needed prior to development to ascertain the full nature of the archaeological resource within the site." These considerations will need extensive investigation and management before any development can take place and may impact the nature of the development. If alternative sites offer fewer encumbrances, it might be better to leave the site as open space and be treated in any future Plan as an opportunity for heritage and ecological management in the same way as the site to the west above Wykeham Vale is being used.
- iv. The site is greenfield site and does nothing towards meeting the policy principle of "brownfield first" – ref page ii of the Plan: Foreword by Cllrs Martin Todd and Jackie Porter). Consideration to any site with the potential for brownfield development should at least be considered. There are few brownfield sites in Wickham but those that may be available should at least be considered.
- v. In summary WK6:
 - a) Is greenfield with special issues (archaeology)
 - b) Offers no brownfield gain
 - c) has no public transport
 - d) offers no open space or sports amenities adjacent to it or elsewhere
 - e) will increase traffic volumes directly onto the tight roundabout at the entrance to Grindall Field.

GROUNDS FOR OBJECTION

This development does not meet the soundness criteria: it is NOT JUSTIFIED as the evidence base for its selection is not up to date and in prior consultations it was not the most preferred choice of residents.

It does not meet the need to consider reasonable alternatives.

It does not meet the test of duty by WCC to co-operate.

It is possible that WCC held a drop-in event at Wickham in September, but we cannot verify that and can find no report of it in the evidence base supporting the Plan on WCC's Plan website and quantified evidence of a large sample has not been produced.

There has been no updated consultation on this site.

It is preferred to Mill Lane to contain the whole requirement if other alternatives that might be considered because they offer greater benefits to the parish.

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

The Plan needs fundamental change to be considered SOUND. Drop WK 5 and WK6. place WK3 as the sole site to be developed for 100 homes.

What is your suggested wording or text for the policy:

“Following consideration of resident input and further examination of the evidence base, WK3 better fits WCC policies and brings greater community benefits and so is the chosen site for development, but not to be completed before 2030”

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