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Winchester District Local Plan

Winchester District Local Plan 2040

Main Modifications - Consultation Responses

January 2026



Winchester
City Council

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Main Modifications – Consultation Responses

The Main Modifications were published for consultation from Friday 21st November 2025 until Friday 16th January 2026.

This document sets out the responses to that consultation and a council response. Each respondent is given a unique reference number, starting with MM2040 followed by a number. Each comment made by that respondent is given a representation number, which is their representor number, followed by a hyphen and then a number.

This report includes only those Main Modifications on which comments were submitted. Main Modifications that did not receive any comments are not included in this report.

MM1 (Foreword)

MM2040 12 - Mr Community Campaigner David Barton

Name	Mr Community Campaigner David Barton
Representor Number	MM2040 12
Representation Number	MM2040 12-2
Representation Summary	Reference required to importance of using authentic Traditional Architecture Design Codes, especially for new construction with a ban on demolition of all buildings constructed prior to 1950.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Reference required to importance of using authentic Traditional Architecture Design Codes, especially for new construction with a ban on demolition of all buildings constructed prior to 1950.</p>
Officer Response	Disagree. It would not be appropriate to include this text in the Foreword to the Local Plan as the Local Plan covers a range of development. The Local Plan could not introduce a blanket ban to stop the demolition of buildings constructed prior to 1950 as there may be planning (or building control) reasons why a building would need to be demolished. If planning permission was required these matters would be assessed at the planning application stage.

MM2040 48 - Bewley Homes

Name	Mr Sam Roach
Representor Number	MM2040 48
Representation Number	MM2040 48-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>After reviewing the representation, which was attributed to MM1 (Foreword), officers have determined that it more appropriately relates to MM6, MM49 and MM98 and have therefore moved the comment accordingly</p> <p>Supporting Information</p> <p>1. Winchester Main Modifications - Reps - Sam Roach.pdf</p>
<p>Officer Response</p>	<p>After reviewing the representation, which was attributed to MM1 (Foreword), officers have determined that it more appropriately relates to MM6, MM49 and MM98 and have therefore moved the comment accordingly.</p>

MM6 (Policy SP2)

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-2
Representation Summary	Object to Modification, focusing on loss of phasing new housing allocations after 2030 and knock on implications for infrastructure.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The original ploy in the Plan for phasing development was sound in the context of good planning principles for Wickham and Knowle. The plan should take into account the developments on the southern border of the parish at Welborne. I realise that there may be legal reasons why these cannot be considered but good strategic planning g dictates that they should be. Infrastructure will be severely stretched and overloaded and by delaying further development in the parish until 2030 at least will have given rise to the opportunity to better understand and allow for the infrastructure impact of both Welborne and new developments in the parish. As it stand if this MM is accepted, there is now no reason not to approve new developments in the parish immediately - to the detriment of joined up planning of infrastructure that will fail to cope unless the issues that will arise are addressed and acted upon.</p>
Officer Response	<p>Do not agree any change is necessary.</p> <p>An Infrastructure Delivery Plan has been prepared in consultation with service providers who are aware of housing proposals in neighbouring areas.</p> <p>Where appropriate, new housing allocations include criteria to ensure that necessary infrastructure improvements are contributed to or secured.</p>

MM2040 19 - Mandy Owen

Name	Mandy Owen
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Representor Number	MM2040 19
Representation Number	MM2040 19-1
Representation Summary	<p>MM6 (Policy CN1) - Please note that MM6 relates to Policy SP2 and not Policy CN1.</p> <ul style="list-style-type: none"> This MM seeks to introduce a requirement for a local plan review to commence within 6 months of adoption of the Plan. Whilst Vistry welcome this addition, they feel it does not go far enough. The current wording does not provide a quantifiable target (i.e. an end date for the review to be undertaken by), nor does it set out or generate a consequence should the review not be completed. As referred to in the Regulation 19 representations, which were submitted by Boyer on behalf of Vistry, we encourage the same, or similar approach to that put in place in the Bedford Borough Council Local Plan be included in Winchester's new plan (updated to reflect WCC's commitment to commencing the review within 6 months of adoption). <p><i>'The Council will undertake a review of the Local Plan 2030, which will commence no later than 6 months after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event this submission date is not adhered to, the policies in the Local Plan 2020-2040 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019'.</i></p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>After reviewing the representation, which was previously attributed to CN1, officers have determined that it more appropriately relates to SP2 and have therefore attributed the comment accordingly.</p> <p>MM6 (Policy CN1) This MM seeks to introduce a requirement for a local plan review to commence within 6 months of adoption of the Plan. Whilst Vistry welcome this addition, they feel it does not go far enough. The current wording does not provide a quantifiable target (i.e. an end date for the review to be undertaken by), nor does it set out or generate a consequence should the review not be completed.</p> <p>As currently written, compliance with the policy could be taken to be the act of the Council undertaking either a Section 10A Review or to undertake only the first stage of plan-making (under the current system), i.e. a Regulation 18 Issues and Options consultation. Whilst the Council may well not be intending to undertake either or one of these approaches in response to the Policy and then cease further progression, it is prudent for good plan making to ensure that neither approach could be employed accordingly through firmer wording in the policy.</p> <p>As referred to in the Regulation 19 representations, which were submitted by Boyer on behalf of Vistry, we encourage the same, or similar approach to that put in place in the Bedford Borough Council Local Plan be included in Winchester's new plan (updated to reflect WCC's commitment to commencing the review within 6 months of adoption).</p>

	<p>'The Council will undertake a review of the Local Plan 2030, which will commence no later than 6 months after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event this submission date is not adhered to, the policies in the Local Plan 2020-2040 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019'. The commitment to both the commencement and undertaking of a full review, i.e. the submission of the updated plan for Examination, is of utmost importance given the impending reorganisation of governance in Hampshire and the Solent being brought forward by the Local Government reorganisation and devolution. With such significant upcoming changes, it is necessary to ensure the commitment to a Local Plan Review, both commencement and conclusion, be a policy requirement in the interim.</p> <p>Main Mods representations o b o Vistry.pdf</p>
Officer Response	<p>Disagree. There is no need to make the changes in this representation. The City Council is still waiting for the regulations on the 30 month Local Plan process so that it can devise a new Local Plan timetable. Work has, however, already commenced on the next Local Plan, a budget has been agreed and some of the key studies are already underway to meet the Government's timeframes for producing a new style Local Plan. There is no need to make specific references to paragraphs in the NPPF in the Local Plan (especially as the consultation draft of the NPPF no longer has paragraph numbers and these could change in any event).</p>

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-4
Representation Summary	<p>As currently drafted the policy is ineffective, and fails to align positively with the published draft guidance. The following further amendments are sought for soundness:</p> <p><u>'The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and be completed within a 30-month programme. This review will primarily address any changes In the National Planning Policy Framework and the Standard Methodology, and will secure levels of growth that accord with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision- making.'</u></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Whilst Blenheim supports the clear acknowledgement that the plan needs to be reviewed as soon as possible after adoption, and supports the introduction of a review policy (incorporated into Policy SP2), as currently worded the policy lacks force. A policy intent to start the review provides no commitment to progressing that review in a timely fashion. In order for the policy to be effective and positive, there must be a commitment to progress, reflecting current draft guidance (https://www.gov.uk/guidance/30-month-local-plan-process-an-overview). This will ensure that the process and timescales are clear, which is important in advance of the Government’s formal implementation of the new system of plan-making.</p> <p>Specifically, the Government has intentionally issued draft guidance setting out a 30-month plan-making process (27th November 2025) so that local planning authorities can see ‘the direction of travel’. Circumstances to undertake early review include where, “an area’s housing requirement has significantly increased following the adoption of a spatial development strategy.” The NPPF 2024, para 236 under ‘implementations’ and the transitional arrangements for plan-making, also confirms that, “...,if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.” This is the case in Winchester District.</p> <p>Given that the Government intends to publish regulations relating to the new local plan system early 2026, and that a ‘call for sites’ has already been undertaken (October 2025), and the Local Development Scheme (LDS February 2025) anticipates consultation on a review plan Q2 2026, there should be a firm commitment not only to starting the review but progressing in a timely manner, noting that the four-month lead in period has already passed.</p> <p>As currently drafted the policy is ineffective, and fails to align positively with the published draft guidance. The following further amendments are sought for soundness:</p> <p><u>‘The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and be completed within a 30-month programme. This review will primarily address any changes in the National Planning Policy Framework and the Standard Methodology, and will secure levels of growth that accord with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.’</u></p> <p>Blenheim also objects to the housing requirements set out in MM6, and refer to objections made under MM49.</p>
<p>Officer Response</p>	<p>Disagree. There is no need to make reference to the 30 month programme in this Local Plan. The City Council is still waiting for the regulations on the 30 month Local Plan process so that it can devise a new Local Plan timetable. Work has, however, already commenced on the next Local Plan, a budget has been agreed and some of the key studies are already underway.</p>

	If the City Council is at any stage unable to demonstrate a 5 Year Housing Land Supply, the titled balance in the NPPF would apply along with a range of other material planning considerations.
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MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-1
Representation Summary	<p>While they support the acknowledgment of plan review necessity, the policy as drafted is ineffective and the wording lacks force and commitment.</p> <p>The response highlights that the policy fails to align with current draft government guidance, specifically referencing the 30-month plan-making process. They note that Winchester District falls under circumstances requiring early review due to housing requirements meeting less than 80% of local housing need.</p> <p>The respondent points out that preparatory steps have already been taken (call for sites, Local Development Scheme) and argues the policy should include firm commitments to timeframes, noting the four-month lead-in period has already passed.</p> <p>Recommended change to the wording:</p> <p><i><u>'The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and be completed within a 30-month programme. This review will primarily address any changes in the National Planning Policy Framework and the Standard Methodology, and will secure levels of growth that accord with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.'</u></i></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Whilst Bargate supports the clear acknowledgement that the plan needs to be reviewed as soon as possible after adoption, and supports the introduction of a review policy (incorporated into Policy SP2), as currently worded the policy lacks force. A policy intent to start the review provides no commitment to progressing that review in a timely fashion. In order for the policy to be effective and positive, there must be a commitment to progress, reflecting current draft guidance (https://www.gov.uk/guidance/30-month-local-plan-process-an-overview). This will ensure that the process and timescales are clear, which is important in advance of the Government's formal implementation of the new system of plan-making.</p>

	<p>Specifically, the Government has intentionally issued draft guidance setting out a 30-month plan-making process (27th November 2025) so that local planning authorities can see ‘the direction of travel’. Circumstances to undertake early review include where, “an area’s housing requirement has significantly increased following the adoption of a spatial development strategy.” The NPPF 2024, para 236 under ‘implementations’ and the transitional arrangements for plan-making, also confirms that, “...,if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.” This is the case in Winchester District.</p> <p>Given that the Government intends to publish regulations relating to the new local plan system early 2026, and that a ‘call for sites’ has already been undertaken (October 2025), and the Local Development Scheme (LDS February 2025) anticipates consultation on a review plan Q2 2026, there should be a firm commitment not only to starting the review but progressing in a timely manner, noting that the four-month lead in period has already passed.</p> <p>As currently drafted the policy is ineffective, and fails to align positively with the published draft guidance and Council’s own LDS. The following further amendments are sought for soundness:</p> <p><u>‘The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and be completed within a 30-month programme. This review will primarily address any changes In the National Planning Policy Framework and the Standard Methodology, and will secure levels of growth that accord with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.’</u></p> <p>Bargate also objects to the housing requirements set out in MM6, and refer to objections made under MM49.</p>
<p>Officer Response</p>	<p>Disagree. There is no need to make reference to the 30 month programme in this Local Plan. The City Council is still waiting for the regulations on the 30 month Local Plan process so that it can devise a new Local Plan timetable. Work has, however, already commenced on the next Local Plan, a budget has been agreed and some of the key studies are already underway.</p> <p>The second part of the recommended change to the wording of the policy would not be enforceable as the once this Local Plan is adopted, it will be the Adopted Development Plan. If the City Council is unable to demonstrate a 5 year HLS, the titled balanced in the NPPF would apply.</p>

MM2040 41 - Home Builders Federation

<p>Name</p>	<p>Mr Mark Behrendt</p>
<p>Representor Number</p>	<p>MM2040 41</p>

Representation Number	MM2040 41-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>HBF agrees with the need for the new plan to be prepared immediately to increased housing supply. However, the new policy after paragraph 3.8 should also refer to ensuring consistency with national policies for decision making that will be introduced as part of the new plan making system. While the detail of these policies is still be finalised it should be noted that the draft NPPF published in December 2025 states in Annex A that <i>“Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”</i>.</p> <p>Such an amendment would ensure that there is sufficient clarity as to what the review of the local plan review would be required to address.</p>
Officer Response	<p>The proposed changes tot he NPPF published in December 2025 are the subject of public consultation which closes 10 March, with no commitment form Government as to when any final decision on these changes will be made. Therefore it is inappropriate for the Plan to include the proposed text.</p> <p>Disagree with the proposed change.</p>

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-3
Representation Summary	<ul style="list-style-type: none"> • Bloor Homes supports the inclusion of a review policy within Policy SP2 and acknowledges the need for a plan review after adoption. • The current policy is criticised for lacking sufficient certainty and commitment to a clear timeframe and expressing intent to begin a review is inadequate. • They believe the policy as currently drafted is ineffective and does not positively reflect the approach set out in published draft guidance. • Reference is made to the recent government draft guidance (November 2025) establishing a 30-month process for local plan reviews, particularly where housing requirements fall below 80% of local housing need. • They note that the Winchester District falls under circumstances warranting an early review according to NPPF 2024 guidance.

	<p>To ensure soundness, the following amendments are required:</p> <p><i>'The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and to be completed within a 30-month programme. This review will primarily address any changes in the National Planning Policy Framework and the Standard Methodology and will secure growth levels consistent with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.'</i></p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>Bloor Homes welcomes the clear acknowledgement that the plan needs to be reviewed as soon as possible following adoption and supports the inclusion of a review policy within Policy SP2.</p> <p>However, as currently drafted, the policy lacks sufficient certainty. An expression of intent to begin a review does not constitute a meaningful commitment to ensure a review is progressed within an appropriate timeframe.</p> <p>For the policy to be effective and positive, it should include a clear commitment to progression, in line with the Government's draft guidance (https://www.gov.uk/guidance/30-month-local-plan-process-an-overview). This would provide much-needed clarity on process and timescales, which is essential, particularly ahead of the formal implementation of the new plan-making system.</p> <p>The draft guidance, published on 27 November 2025, establishes a 30-month process intended to provide local planning authorities with clear direction. It expressly identifies circumstances warranting an early review where an early review is justified, including where <i>"an area's housing requirement has significantly increased following the adoption of a spatial development strategy."</i> Paragraph 236 of the NPPF 2024, under 'implementations' and the transitional arrangements for plan-making, further confirms that, <i>"...if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."</i> This clearly applies in the case of Winchester District.</p> <p>Considering the Government plans to introduce regulations for the new local plan system in early 2026, that a 'call for sites' was undertaken in October 2025, and that the Local Development Scheme (February 2025) envisages consultation on a review plan in Q2 2026, there should be a clear commitment not only to starting the review but also advancing it promptly, particularly given that the four-month lead in period has already passed.</p>

	<p>In its present form, the policy is therefore ineffective and does not positively reflect the approach set out in the published draft guidance.</p> <p>Bloor Homes also objects to the housing requirements set out in MM6, please see representations made under MM49.</p> <p><i>Proposed change:</i></p> <p>In its present form, the policy is therefore ineffective and does not positively reflect the approach set out in the published draft guidance and the Council's own Local Development Scheme.</p> <p>To ensure soundness, the following amendments are required:</p> <p><i>'The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and to be completed within a 30-month programme. This review will primarily address any changes in the National Planning Policy Framework and the Standard Methodology and will secure growth levels consistent with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.</i></p>
Officer Response	<p>Disagree. There is no need to make reference to the 30 month programme in this Local Plan. The City Council is still waiting for the regulations on the 30 month Local Plan process so that it can devise a new Local Plan timetable. Work has, however, already commenced on the next Local Plan, a budget has been agreed and some of the key studies are already underway.</p> <p>The second part of the recommended change to the wording of the policy would not be enforceable as the once this Local Plan is adopted, it will be the Adopted Development Plan. If the City Council is unable to demonstrate a 5 year HLS, the titled balanced in the NPPF would apply.</p>

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-14
Representation Summary	<ul style="list-style-type: none"> • Acknowledgement of plan review but states that the current wording "lacks force" with only an "intent to start" rather than a commitment to timely progression. They believe this makes the policy ineffective. • The response references specific government guidance, including the draft 30-month plan-making process and NPPF 2024 requirements, stating that the current policy fails to align particularly for areas where housing requirements are below 80% of local housing need. • Notes that a 'call for sites' has already occurred and the Local Development Scheme anticipates consultation in Q2 2026, suggesting the review process has already begun but lacks firm commitment to completion timeframes. <p>The following further amendments are sought for soundness:</p>

	<p><i>'The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and be completed within a 30-month programme. This review will primarily address any changes in the National Planning Policy Framework and the Standard Methodology, and will secure levels of growth that accord with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.'</i></p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Whilst Blenheim supports the clear acknowledgement that the plan needs to be reviewed as soon as possible after adoption, and supports the introduction of a review policy (incorporated into Policy SP2), as currently worded the policy lacks force. A policy intent to start the review provides no commitment to progressing that review in a timely fashion. In order for the policy to be effective and positive, there must be a commitment to progress, reflecting current draft guidance (https://www.gov.uk/guidance/30-month-local-plan-process-an-overview). This will ensure that the process and timescales are clear, which is important in advance of the Government's formal implementation of the new system of plan-making.</p> <p>Specifically, the Government has intentionally issued draft guidance setting out a 30-month plan-making process (27th November 2025) so that local planning authorities can see <i>'the direction of travel'</i>. Circumstances to undertake early review include where, <i>"an area's housing requirement has significantly increased following the adoption of a spatial development strategy."</i> The NPPF 2024, para 236 under 'implementations' and the transitional arrangements for plan-making, also confirms that, <i>"...if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need."</i> This is the case in Winchester District.</p> <p>Given that the Government intends to publish regulations relating to the new local plan system early 2026, and that a 'call for sites' has already been undertaken (October 2025), and the Local Development Scheme (LDS February 2025) anticipates consultation on a review plan Q2 2026, there should be a firm commitment not only to starting the review but progressing in a timely manner, noting that the four-month lead in period has already passed.</p> <p>As currently drafted the policy is ineffective, and fails to align positively with the published draft guidance. The following further amendments are sought for soundness:</p> <p><i>'The Council will undertake a review of the Local Plan 2040, which will start immediately after the adoption of the plan and be completed within a 30-month programme. This review will primarily address any changes in the National Planning</i></p>

	<p><i>Policy Framework and the Standard Methodology, and will secure levels of growth that accord with Government Policy. Any delay in the programme towards plan adoption will be taken into consideration in decision-making.'</i></p> <p>Blenheim also objects to the housing requirements set out in MM6, and refer to objections made under MM49.</p>
Officer Response	<p>Disagree. There is no need to make reference to the 30 month programme in this Local Plan. The City Council is still waiting for the regulations on the 30 month Local Plan process so that it can devise a new Local Plan timetable. Work has, however, already commenced on the next Local Plan, a budget has been agreed and some of the key studies are already underway.</p>

MM2040 48 - Bewley Homes

Name	Mr Sam Roach
Representor Number	MM2040 48
Representation Number	MM2040 48-3
Representation Summary	<ul style="list-style-type: none"> • Supports the principle of an early review of the Local Plan but believes the current wording lacks sufficient detail and commitment to ensure timely implementation. • The current modifications only require the Council to "start work" on a review without specifying deadlines for submission, examination or adoption, creating risk of delays or prolonged processes due to resource constraints or changing political priorities. • Considers the Main Modification not sound because it fails the "effectiveness" test within the Tests of Soundness, lacking clear timelines and accountability measures. • A specific alternative is proposed based on the Bedford Local Plan model, including defined submission deadlines, clear milestones, specific review focus areas, and consequences for missing deadlines (the plan being considered "out of date").
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>After reviewing the representation, which was previously attributed to MM1 (Foreword), officers have determined that it more appropriately relates to MM6 and have therefore moved the comment accordingly.</p> <p><u>Early Review of the Local Plan – Timing and Certainty</u></p> <p>We support, in principle, the commitment to an early review of the Local Plan. However, we consider that the current wording of the Main Modifications does not go far enough to provide certainty or meaningful reassurance.</p>

	<p>At present, the modifications require only that the Council “start work” on a review of the Local Plan within a defined period. There is no commitment to submission, examination or adoption by a specified date. As a result, there is a real risk that the review could be delayed or prolonged, particularly in the context of resource constraints or changing political priorities.</p> <p>Given the scale of change to national planning policy, the revised standard method and ongoing uncertainty around strategic housing needs, we consider that a more robust and time-bound commitment is necessary.</p> <p>We therefore suggest that the Main Modifications give further thought to:</p> <p>Requiring the early review not only to commence, but to be submitted for examination within a defined timeframe; and Including clear milestones for progression, to ensure that housing need is addressed promptly and transparently.</p> <p>Without such provisions, the early review risks becoming an open-ended commitment, undermining confidence in the Plan’s ability to remain up to date. The Main Modification as currently proposed are not sound, because it is not effective in line with the Tests of Soundness. Revised text to address this issue can be found below. This is based on the review policy of the Bedford Local Plan, which is often used as best practice in addressing early reviews on the Local Plan and ensuring there is implications for a failure to submit a Local Plan.</p> <p>“The Local Planning Authority will undertake a review of the Local immediately following the adoption of this Plan. An updated or replacement plan will be submitted for examination no later than two years from the date of adoption of this Plan. The updated or replacement Local Plan will cover all policies (save for matters of development management) but will focus on the following matters that have been specifically identified during the preparation and examination of this plan:</p> <ul style="list-style-type: none"> • Housing requirement for the whole local authority area based on the most up to-date national guidance (as at the date of submission). • How to address matters of unmet need with neighbouring authorities. • Assessment of each policy and its conformity to the NPPF. <p>The replacement plan will secure levels of growth that accord with Government policy. The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint evidence or policies based upon wider functional geographies. Failure to meet the above timescales will lead to the existing Local Plan being considered out of date in relation to its housing policies.”.</p> <p>Supporting Information</p> <ol style="list-style-type: none"> 1. Winchester Main Modifications - Reps - Sam Roach.pdf
<p>Officer Response</p>	<p>Disagree. The Government has very recently published guidance on a 30 month timeframe for producing a new style Local Plan. However, the regulations have not yet been published. Whilst we do know some key dates what we don't have is the regulations which will clarify the key steps and the timings to enable a project plan to be prepared.</p>

	Work has already started on the next Local Plan and Consultants have been appointed. Officers believe that the wording of MM6 is strong enough as we are in a period of transition to a new style Local Plan-making process which means that the wording is as precise as it can be at this moment in time.
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MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-1
Representation Summary	<ul style="list-style-type: none"> • Bloor acknowledges the additional references in Policy SP2 regarding the Local Plan review; however, it considers that the current wording ('as soon as possible after adoption' and 'will start no later than 6 months after adoption') is not sufficiently robust. • Bloor believes the policy should specify both: (a) the date on which substantive formal plan-making will commence (no later than 31 October 2026, in line with the latest Government guidance on the new plan-making system); and (b) a date for submission to Examination. • Without these dates being explicitly stated, there is no clear benchmark against which the policy can be measured.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bloor acknowledges the additional references in Policy SP2 regarding the Local Plan review; however, it considers that the current wording ('as soon as possible after adoption' and 'will start no later than 6 months after adoption') is not sufficiently robust. Bloor believes the policy should specify both: (a) the date on which substantive formal plan-making will commence (no later than 31 October 2026, in line with the latest Government guidance on the new plan-making system); and (b) a date for submission to Examination. Without these dates being explicitly stated, there is no clear benchmark against which the policy can be measured.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf</p>
Officer Response	Disagree. The City Council is still waiting for the regulations on the 30 month Local Plan process so that it can devise a new Local Plan timetable. Work has, however, already commenced on the next Local Plan, a budget has been agreed and some of the key studies are already underway. In the absence of the regulations this is as far as the wording of the Local Plan can go.

MM7 (Policy SP3)

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-8
Representation Summary	<p>Whilst Government Guidance is to recognise the benefits of agricultural land, the requirement to demonstrate that the potential loss has been ‘assessed’ in all cases misaligns with wider Government Policy. The wording should be amended for reasons of soundness to:</p> <p><u>‘Where appropriate, proposals should recognise the benefits of the best and most versatile agricultural land and demonstrate they have assessed any potential loss of the best and most versatile agricultural land on sites above 20 hectares.’</u></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It is of concern that the main modifications include additional policy wording which states, ‘Where appropriate, proposals should demonstrate they have considered and assessed any potential loss of the best and most versatile agricultural land.’</p> <p>Blenheim do not support the addition of this wording. It is overly restrictive, particularly with respect to sites of less than 20 hectares, when taking into account the PPG (8-001-20190721) which references ‘large scale non-agricultural development’, and Governmental Agricultural Land guidance¹ which refers to the need for local planning authorities to only consult Natural England on non-agricultural applications that result in the loss of more than 20 hectares of best and most versatile agricultural land if the land is not included [allocated] in a development plan.</p> <p>Whilst Government Guidance is to recognise the benefits of agricultural land, the requirement to demonstrate that the potential loss has been ‘assessed’ in all cases misaligns with wider Government Policy. The wording should be amended for reasons of soundness to:</p> <p><u>‘Where appropriate, proposals should recognise the benefits of the best and most versatile agricultural land and demonstrate they have assessed any potential loss of the best and most versatile agricultural land on sites above 20 hectares.’</u></p>

Officer Response	Disagree. It is considered that the wording 'where appropriate' is clear. This wording also allows flexibility should the Government decide to change the wording in the PPG in the future and introduce a new threshold.
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MM2040 28 - Wickham Residents Association

Name	Mr Geoffrey Burton
Representor Number	MM2040 28
Representation Number	MM2040 28-2
Representation Summary	After the words <u>not increase flood risk</u> add the following <u>by carrying out a comprehensive Flood Risk Assessment and implementing all mitigation measures</u>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>after the words <u>not increase flood risk</u> add the following <u>by carrying out a comprehensive Flood Risk Assessment and implementing all mitigation measures</u></p>
Officer Response	Disagree. The Lead Local Flood Risk Authority would be consulted and in any event, a Flood Risk Assessment would need to be undertaken if the area of was at risk of flooding.

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-5
Representation Summary	<ul style="list-style-type: none"> • WKPC supports this modification while highlighting an Appeal Decision that acknowledges flooding issues in Wickham relates to the ageing infrastructure which is under pressure from new housing developments, suggesting a precautionary approach is necessary.

	<ul style="list-style-type: none"> • Expects flood risk to be a significant condition for any development approval, including the need for updated flood risk assessments. • Reference is made to a 2015 Wickham Flood Investigation Report which recommended that no further development should occur without mitigating steps to prevent flooding, noting that these steps have been undertaken.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>WKPC supports this modification. In doing so draws attention to the Appeal Decision re 24/02803/FUL which states: "Given the clear history of foul water flooding that has occurred around Wickham, which appears to relate to the cumulative pressures placed on aging infrastructure through new housing development, I find that a precautionary approach is required."</p> <p>WKPC expects this to weigh heavily in the conditions for approval of this and any development in Wickham including an update to the most recent flood risk assessment report. This review should be cognizant of and update the "Wickham Flood Investigation Report" commissioned by HCC and published 10th March, 2015, conducted by Atkins Ltd. It is important to note that this report stated that no further development should take place in Wickham before mitigating steps had been carried out to prevent future flooding – but no such steps have been undertaken.</p>
Officer Response	Support welcomed. The Local Lead Flood Authority have been fully engaged with the drafting of the wording of this site allocation and they will be providing comments on the planning application when it is submitted.

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-15
Representation Summary	<ul style="list-style-type: none"> • The proposed modification contradicts existing government guidance which only requires consultation with Natural England for non-agricultural development on sites larger than 20 hectares of best and most versatile agricultural land. • Requiring assessment of potential loss of agricultural land "where appropriate" is too restrictive, particularly for smaller sites under 20 hectares.

	<p>Whilst Government Guidance recognises the benefits of agricultural land, the requirement to demonstrate that the potential loss has been ‘assessed’ in all cases misaligns with wider Government Policy. The wording should be amended for reasons of soundness to:</p> <p><u>‘Where appropriate, proposals should recognise the benefits of the best and most versatile agricultural land and demonstrate they have assessed any potential loss of the best and most versatile agricultural land on sites above 20 hectares.’</u></p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It is of concern that the main modifications include additional policy wording which states, ‘Where appropriate, proposals should demonstrate they have considered and assessed any potential loss of the best and most versatile agricultural land.’</p> <p>Bargate Homes do not support the addition of this wording. It is overly restrictive, particularly with respect to sites of less than 20 hectares, when taking into account the PPG (8-001-20190721) which references ‘large scale non-agricultural development’, and Governmental Agricultural Land guidance¹ which refers to the need for local planning authorities to only consult Natural England on non-agricultural applications that result in the loss of more than 20 hectares of best and most versatile agricultural land if the land is not included [allocated] in a development plan.</p> <p>Whilst Government Guidance is to recognise the benefits of agricultural land, the requirement to demonstrate that the potential loss has been ‘assessed’ in all cases misaligns with wider Government Policy. The wording should be amended for reasons of soundness to:</p> <p><u>‘Where appropriate, proposals should recognise the benefits of the best and most versatile agricultural land and demonstrate they have assessed any potential loss of the best and most versatile agricultural land on sites above 20 hectares.’</u></p> <p>source: https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land</p>
<p>Officer Response</p>	<p>Disagree. It is considered that the wording 'where appropriate' is clear. This wording also allows flexibility should the Government decide to change the wording in the PPG in the future and introduce a new threshold.</p>

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-6
Representation Summary	<p>Whilst Government Guidance is to recognise the benefits of agricultural land, the requirement to demonstrate that the potential loss has been ‘assessed’ in all cases misaligns with wider Government Policy. The wording should be amended for reasons of soundness to:</p> <p><i>‘Where appropriate, proposals should recognise the benefits of the best and most versatile agricultural land and demonstrate they have assessed any potential loss of the best and most versatile agricultural land on sites above 20 hectares.’</i></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It is of concern that the main modifications include additional policy wording which states, <i>‘Where appropriate, proposals should demonstrate they have considered and assessed any potential loss of the best and most versatile agricultural land.’</i></p> <p>Blenheim do not support the addition of this wording. It is overly restrictive, particularly with respect to sites of less than 20 hectares, when taking into account the PPG (8-001-20190721) which references <i>‘large scale non-agricultural development’</i>, and Governmental Agricultural Land guidance¹ which refers to the need for local planning authorities to only consult Natural England on non-agricultural applications that result in the loss of more than 20 hectares of best and most versatile agricultural land if the land is not included [allocated] in a development plan.</p> <p>Whilst Government Guidance is to recognise the benefits of agricultural land, the requirement to demonstrate that the potential loss has been ‘assessed’ in all cases misaligns with wider Government Policy. The wording should be amended for reasons of soundness to:</p> <p><i>‘Where appropriate, proposals should recognise the benefits of the best and most versatile agricultural land and demonstrate they have assessed any potential loss of the best and most versatile agricultural land on sites above 20 hectares.’</i></p>
Officer Response	Disagree. It is considered that the wording 'where appropriate' is clear. This wording also allows flexibility should the Government decide to change the wording in the PPG in the future and introduce a new threshold.

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-1
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Agree no further amendment is required.

MM8 (Policy CN1)

MM2040 12 - Mr Community Campaigner David Barton

Name	Mr Community Campaigner David Barton
Representor Number	MM2040 12
Representation Number	MM2040 12-1
Representation Summary	Full protection must be provided to non-designated heritage assets as well as unclassified buildings, particularly detached lone-standing ones susceptible to falling into decline.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>full protection must be provided to non-designated heritage assets as well as unclassified buildings, particularly detached lone-standing ones susceptible to falling into decline.</p>
Officer Response	Disagree. Heritage issues, including the protection of non-designated heritage assets, are dealt with under Policy HE7 - it is important to read the Local Plan as a whole.

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-3
Representation Summary	This change "consideration of flood risk" is to be strongly welcomed. It is pleasing that the Appeal Inspector for a new development in Wickham has made clear that flood risk is a concern that must be given proper consideration ...which it had not been in the planning application
Full Representation	In terms of this Main Modification do you?

	<p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>This change "consideration of flood risk" is to be strongly welcomed. It is pleasing that the Appeal Inspector for a new development in Wickham has made clear that flood risk is a concern that must be given proper consideration ...which it had not been in the planning application</p>
Officer Response	Comments noted and support welcomed.

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-12
Representation Summary	<p>There should be flexibility, as the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development. The policy should be revised to state:</p> <p><i>"xiv. The design process should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and...</i>"</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim Strategic does not object to the principle of criterion xiv of Policy CN1, but it should apply flexibility, as the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.</p> <p>The policy should be revised to state:</p>

	<i>"xiv. The design process should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and..."</i>
Officer Response	Disagree. The wording of this criterion is not considered to be restrictive as the whole point if the design process is that matters like this should be explored and tested.

MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-4
Representation Summary	<ul style="list-style-type: none"> • Concern about the lack of clarity in the proposed modification regarding heritage assets and climate change • It is not clear what important contribution heritage can make to climate change mitigation and adaption over and above the reuse, retention, repair of any other (non-historic) building and therefore the purpose of the proposed the new criterion proposed between vii and viii in respect of heritage assets. • No consideration appears to have been given to the particular challenges faced by listed building in enhancing energy efficiency and reducing carbon emissions. • Questions the rationale for singling out heritage assets in climate change policy without acknowledging their unique constraints.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It is not clear what important contribution heritage can make to climate change mitigation and adaption over and above the reuse, retention, repair of any other (non-historic) building and therefore the purpose of the proposed the new criterion proposed between vii and viii in respect of heritage assets. No consideration appears to have been given to the particular challenges faced by listed building in enhancing energy efficiency and reducing carbon emissions.</p>

Officer Response	Disagree. It is important to read the Local Plan as a whole. Policy HE14 specifically deals with improvements and alterations to improve energy efficiency measures and the guidance that is on the City Council website. The wording of MM8 and Policy HE14 have been agreed with Historic England to specifically respond to this issue facing by listed buildings.
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MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-9
Representation Summary	<p>Supports the principle of criterion xiv but states that flexibility is necessary as green roofs and walls "will not be appropriate in many instances" and add costs to developments already facing numerous requirements.</p> <p>The response highlights financial considerations, noting that green features add "additional cost to development" and suggests acknowledging that "not all measures will be suitable or cost effective in every instance."</p> <p>Recommended change to the wording:</p> <p>The policy should be revised to state: <i>"xiv. The design process assesses and should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and..."</i></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bargate does not object to the principle of criterion xiv of Policy CN1, but it should apply flexibility, as the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.</p> <p>The policy should be revised to state: <i>"xiv. The design process assesses and should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigatingoverheating, while recognising that not all measures will be suitable or cost effective in every instance; and..."</i></p>

Officer Response	Disagree. The wording of this criterion is not considered to be restrictive as the whole point of the design process is that matters like this should be explored and tested.
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MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-12
Representation Summary	<p>Bloor Homes does not object to the principle of criterion xiv of Policy CN1, but it should apply flexibility, the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.</p> <p><u>Proposed change:</u></p> <p><i>xiv. The design process should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and</i></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>Bloor Homes does not object to the principle of criterion xiv of Policy CN1, but it should apply flexibility, the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.</p> <p><u>Proposed change:</u></p> <p><i>xiv. The design process should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and</i></p>
Officer Response	Disagree. The wording of this criterion is not considered to be restrictive as the whole point of the design process is that matters like this should be explored and tested.

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-2
Representation Summary	<p>Blenheim Strategic does not object to the principle of criterion xiv of Policy CN1, but it should apply flexibility, as the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.</p> <p>Highlights concerns about additional costs imposed by the policy requirements on developments that already face numerous other requirements.</p> <p>Proposed Wording Amendment:</p> <p>The policy should be revised to state: <i>“xiv. The design process assesses and should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and...”</i></p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim Strategic does not object to the principle of criterion xiv of Policy CN1, but it should apply flexibility, as the use of green roofs and walls will not be appropriate in many instances and will add additional cost to development, which must already address a wide range of requirements.</p> <p>The policy should be revised to state: <i>“xiv. The design process assesses and should consider, where feasible, the use of green roofs and walls that are covered in vegetation, fenestration, insulation, external shutters, and the use of colour of external materials that can all contribute towards mitigating overheating, while recognising that not all measures will be suitable or cost effective in every instance; and...”</i></p>
Officer Response	Disagree. It is important to read the Local Plan as whole. The wording of the criterion is not considered to be restrictive as the whole point of the design process is that matters like this should be explored and tested.

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-2
Representation Summary	There are a number of modifications for policies relating to energy and carbon emissions (CN1 – CN8) MM8 – MM13. The modifications are relatively minor and mainly relate to distinctions between new and existing buildings and how this will be addressed by relevant policies. The modifications highlight the benefits of reusing existing buildings and integrating sensitive and well-considered refurbishment strategies to heritage assets (MM8 – MM10), which Bloor is supportive of.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The Council propose a number of modifications for policies relating to energy and carbon emissions (CN1 – CN8), detailed in the Council’s proposed MM8 – MM13. The modifications are relatively minor and mainly relate to distinctions between new and existing buildings and how this will be addressed by relevant policies. The modifications highlight the benefits of reusing existing buildings and integrating sensitive and well-considered refurbishment strategies to heritage assets (MM8 – MM10), which Bloor is supportive of.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf</p>
Officer Response	Support welcomed.

MM9 (Policy CN2)

MM2040 12 - Mr Community Campaigner David Barton

Name	Mr Community Campaigner David Barton
Representor Number	MM2040 12
Representation Number	MM2040 12-3
Representation Summary	With ban on demolition of buildings constructed prior to 1950 to ensure the optimum potential of carbon capture.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>with ban on demolition of buildings constructed prior to 1950 to ensure the optimum potential of carbon capture.</p>
Officer Response	Disagree. This is beyond the remit of what a Local Plan is able to control.

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-10
Representation Summary	<p>Broadly supports the proposed energy hierarchy and particularly endorses the 'fabric first approach' to minimising energy demand.</p> <p>Balance Between Aspirations and Practicality</p> <p>There is concern about striking an appropriate balance between environmental aspirations and practical implementation, including financial viability considerations.</p> <p>Lack of Detailed Guidance</p> <p>The policy is criticised for insufficient detail about specific interventions required at each stage of the hierarchy, making it difficult for applicants to understand requirements.</p>

	<p>Risk of Misinterpretation</p> <p>The current wording of the policy leaves the policy open to confusion and varying interpretations due to limited explanatory support text.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Broadly support the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the 'fabric first approach.' However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability.</p> <p>Policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council's requirements.</p>
<p>Officer Response</p>	<p>Disagree. The wording of the policy and accompanying diagram is considered to achieve the right balance. There is a danger that the policy (and the supporting text) could become overly restrictive in terms of the approach that should be taken which could vary depending on the site in question. The requirements of this policy can always be discussed on a case by case basis at the pre-app stage.</p>

MM2040 40 - Bargate Homes

<p>Name</p>	<p>Miss Nia Powys</p>
<p>Representor Number</p>	<p>MM2040 40</p>
<p>Representation Number</p>	<p>MM2040 40-4</p>
<p>Representation Summary</p>	<ul style="list-style-type: none"> • The response shows support for the energy hierarchy concept but raises concerns about implementation details and practicality. • Broadly supports the proposed energy hierarchy, particularly the need to minimise energy demand through the 'fabric first approach'. • There is concern about striking a balance between energy aspirations and practical implementation, including financial viability considerations.

	<ul style="list-style-type: none"> The policy is criticised for insufficient detail on interventions at each hierarchy stage, making requirements unclear for applicants and open to interpretation. Notes that the supporting text provides little information to help readers understand the Council's requirements.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Broadly support the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the 'fabric first approach.' However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability.</p> <p>Policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council's requirements.</p>
Officer Response	<p>Disagree. The wording of the policy and accompanying diagram is considered to achieve the right balance. There is a danger that the policy (and the supporting text) could become overly restrictive in terms of the approach that should be taken which could vary depending on the site in question. The requirements of this policy can always be discussed on a case by case basis at the pre-app stage.</p>

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-6
Representation Summary	<ul style="list-style-type: none"> Supports the energy hierarchy and fabric-first approach but expresses concerns about implementation details and financial viability. There is a need to balance energy aspirations with implementation practicalities and financial viability considerations. The policy is criticised for not including sufficient detail about what interventions should be considered at each stage of the hierarchy, leaving it open to confusion and interpretation. There is little information in the supporting text to help readers understand the Council's requirements.

Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>Broadly support the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the 'fabric first approach.' However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability.</p> <p>Policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council's requirements.</p> <p><u>Proposed change:</u></p> <p>Please refer to the reasoning above.</p>
Officer Response	<p>Disagree. The wording of the policy and accompanying diagram is considered to achieve the right balance. There is a danger that the policy (and the supporting text) could become overly restrictive in terms of the approach that should be taken which could vary depending on the site in question. The requirements of this policy can always be discussed on a case by case basis at the pre-app stage.</p>

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-15
Representation Summary	<ul style="list-style-type: none"> • The response shows support for the energy hierarchy concept but raises concerns about implementation details and practicality. • Broadly supports the proposed energy hierarchy, particularly the need to minimise energy demand through the 'fabric first approach'. • There is concern about striking a balance between energy aspirations and practical implementation, including financial viability considerations.

	<ul style="list-style-type: none"> • The policy is criticised for insufficient detail on interventions at each hierarchy stage, making requirements unclear for applicants and open to interpretation. • Notes that the supporting text provides little information to help readers understand the Council's requirements.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Broadly support the proposed energy hierarchy, and in particular the need to minimise energy demand by employing the 'fabric first approach.' However, it is essential to strike a balance between these aspirations and the practicalities of implementation and financial viability.</p> <p>Policy needs to include more detail on what interventions should be considered at each stage of the hierarchy. As currently drafted, the policy does not include sufficient detail to enable applicants to understand what is required and as such is open to confusion and interpretation. Furthermore, there is little information set out in the support text which aids the reader to understand the Council's requirements.</p>
Officer Response	<p>General support for the policy is welcomed.</p> <p>Disagree that the policy should include more details on what interventions are needed at each stage of the hierarchy as this will vary on a case by case basis and on the site in question.</p> <p>The concept of an energy hierarchy is a well known and if further guidance is required this can be sought through the Council's pre-application service.</p>

MM10 (Policy CN3)

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-5
Representation Summary	<p>The respondent acknowledges the Council's commitment to carbon neutrality by 2030, ahead of the UK's 2050 target, but questions the implementation approach.</p> <p>Policy Flexibility</p> <p>The addition of the word 'buildings' to the policy is welcomed as it provides greater flexibility for achieving the proposed standards.</p> <p>Lack of Evidence</p> <p>The respondent objects to Policy CN3 requirements that exceed Future Homes Standard or Building Regulations, citing insufficient robust evidence to justify these enhanced requirements.</p> <p>Practicality for Outline Applications</p> <p>The respondent argues that outline proposals cannot feasibly provide the detailed energy modelling information required, even with the inclusion of 'predictive' wording in the policy.</p> <p>Suggested Policy Amendment</p> <p>A specific amendment is proposed to exempt outline applications from embodied carbon emissions assessments, suggesting the policy should explicitly state that "outline applications are not expected to undertake assessment of embodied carbon emissions."</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The commitment of the Council to offer leadership for the district to be carbon neutral by 2030 is noted, ahead of the UK's legally binding target of 2050. Blenheim also notes the addition of the policy to include the word 'buildings' and does welcome this addition as it provides greater flexibility for achieving the proposed standards. However, Blenheim retain their objection in that there is no robust evidence to justify the requirements in Policy CN3 which go beyond the Future Homes Standard ('FHS') or Building Regulations as set out in earlier representations and hearing statements.</p>

	<p>Although Blenheim acknowledges the inclusion of the term '<i>predictive</i>' in relation to view that, notwithstanding this wording, outline proposals will be unable to provide information that is sufficiently feasible or practical at this stage. As such, the requirement is considered unjustified for this type of development.</p> <p>The policy should be revised to state '<i>outline applications are not expected to undertake assessment of embodied carbon emissions.</i>'</p>
Officer Response	<p>Support welcomed for the inclusion of the word 'building'.</p> <p>Disagree with the comment that there is not a robust evidence base to support this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view this there is no need to amend the policy.</p> <p>Disagree with the comment that outline planning applications should be except from this policy. The whole purpose of Policy CN3 is that new development should demonstrate the lowest possible carbon emissions and if this key consideration is not addressed and considered at the earliest possible stage of the design process, it could be challenging to meet the requirement of the policy.</p> <p>Embodied carbon is not dealt with by Policy CN3 as this is addressed in Policy CN7. However, it would not be appropriate to exclude outline planning from either Policy CN3 or CN8 from embodied carbon assessments for the same reasons that have been stated above.</p>

MM2040 25 - Kennedy Wilson

Name	Mr Lawrence Clark
Representor Number	MM2040 25
Representation Number	MM2040 25-3
Representation Summary	<p>Broadly support draft Policy CN3 but they do request the following paragraph was amended as follows:</p> <p>"These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons. These reasons should be established through the design process and demonstrate that achieving these standards produces a development that would be harmful to its setting or the character of the wider area or it is demonstrated that is not practical or financially viable."</p> <p>The current draft policy wording does not include "or financially viable" and we therefore request this is added to the end of the sentence. As outlined in the Regulation 19 representation, there may be circumstances where development viability is challenging and the cost of meeting the standards in draft Policy CN3 is a factor contributing to inflated building costs.</p>

	<p>We would also welcome a paragraph in the sub-text to expand on the point of practicality and viability being a reason to not comply with the requirements.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Knight Frank, on behalf of Kennedy Wilson (KW) Forum Ltd, who are landowners at Solent Business Park, have been actively engaged in the Local Plan examination and have submitted representations at Regulation 18 Stage (Ref. ANON-KSAR-NKFC-K), Regulation 19 Stage (Ref. ANON-AQTS-32G3-R), and at the Local Plan Hearing Statements(Ref. ANON-AQTS-32G3).</p> <p>Representations were submitted at the Regulation 19 draft Local Plan consultation in relation to Policy CN3. The representation broadly supported draft Policy CN3 but requested the following paragraph was amended as follows:</p> <p><i>“These should be in line with the requirements set out below unless there are exceptionally clear and compelling reasons. These reasons should be established through the design process and demonstrate that achieving these standards produces a development that would be harmful to its setting or the character of the wider area or it is demonstrated that is not practical <u>or financially viable.</u>”</i></p> <p>The current draft policy wording does not include “<i>or financially viable</i>”and we therefore request this is added to the end of the sentence. As outlined in the Regulation 19 representation, there may be circumstances where development viability is challenging and the cost of meeting the standards in draft Policy CN3 is a factor contributing to inflated building costs.</p> <p>We would also welcome a paragraph in the sub-text to expand on the point of practicality and viability being a reason to not comply with the requirements to their fullest for greater clarity on this matter.</p>
<p>Officer Response</p>	<p>Disagree. There has been a robust evidence base to support this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view this there is no need to amend the wording of the policy.</p>

MM2040 29 - Historic England

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-1
Representation Summary	<p>Taking a fabric first approach for traditionally constructed building is not often either practicable nor desirable citing potential conflicts with Policy HE14 referencing Historic England guidance.</p> <p>There is concern that the current wording could conflict with the approach proposed in policy HE14, suggesting a risk of conflict between different parts of the plan.</p> <p>Recommended wording change.</p> <p>"When adapting existing traditionally constructed buildings, care must be taken, and professional advice sought. Policy HE14 requires taking a whole building approach. Traditional construction* absorbs moisture but allows it to evaporate when conditions become drier. This is in contrast to modern construction, which often relies on impermeable barriers to prevent moisture entering the fabric. Thus, when insulation is added it needs to be done in a way that maintains the moisture balance."</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We do not recommend a fabric first approach for traditionally constructed buildings. As stated on the Historic England website, taking a fabric first approach for such buildings is often neither practicable nor desirable. Also, it risks conflict with the approach proposed in HE14. We suggest rephrasing this line as follows:</p> <p>"When adapting existing traditionally constructed buildings, care must be taken, and professional advice sought. Policy HE14 requires taking a whole building approach. Traditional construction* absorbs moisture but allows it to evaporate when conditions become drier. This is in contrast to modern construction, which often relies on impermeable barriers to prevent moisture entering the fabric. Thus, when insulation is added it needs to be done in a way that maintains the moisture balance."</p> <p>Supporting Information</p> <p>1. Historic England - 20260115_Winchester_LP_mainmods_consultation_GRHE_response_Redacted.pdf</p>

Officer Response	Disagree. The wording (which was previously agreed with Historic England) is already clearly written. The additional wording is not needed in terms of soundness.
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MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-3
Representation Summary	<ul style="list-style-type: none"> • Welcomes the confirmation that Policy CN3 does not apply to the conversion or change of use of commercial buildings. • Suggests the policy should acknowledge that photovoltaics may not be suitable in all cases, particularly where heritage assets might be impacted or where building orientation (dictated by surrounding urban form) makes them impractical. • Recommends allowing flexibility to implement alternative energy solutions when photovoltaics are not appropriate for a specific site.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The confirmation that Policy CN3 does not apply to the conversion or change of use of commercial buildings is welcomed.</p> <p>The policy should be amended to recognise that the use of photovoltaics may not be appropriate on every site e.g. due to impact on heritage assets or due to the sensitivities of the area and/or orientation of the building where it is dictated by the prevailing urban form of the surrounding area. Flexibility should be applied to allow alternatives to photovoltaics if appropriate.</p>
Officer Response	<p>Support welcomed in relation to the confirmation that Policy CN3 does not apply to conversions or change of use.</p> <p>Disagree with the point about photovoltaics. It is important that the Local Plan is read as a whole, The points that have been made in this representation can be addressed through the design process (Policy D1). If the proposal involves making improvements to the energy efficiency measures on a historic asset, this can be assessed under Policy HE14.</p>

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-10
Representation Summary	<p>Acknowledges some positive aspects of the Council's policy modifications but maintains objections to Policy CN3, suggesting policy lacks sufficient evidence base and is impractical for outline applications.</p> <p>Recognizes the Council's carbon neutrality commitment and welcomes the addition of the word 'buildings' to the policy as it provides greater flexibility for achieving standards.</p> <p>Objects that there is insufficient evidence to justify Policy CN3 requirements that exceed the Future Homes Standard or Building Regulations, maintaining their previous position from earlier representations.</p> <p>Despite the inclusion of the term 'predictive' in the policy regarding energy modelling, believes outline proposals cannot provide sufficiently feasible or practical information at that stage.</p> <p>Proposes a specific policy revision stating that "outline applications are not expected to undertake assessment of embodied carbon emissions," indicating they believe the current requirements are unjustified for outline development applications.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The commitment of the Council to offer leadership for the district to be carbon neutral by 2030 is noted, ahead of the UK's legally binding target of 2050. Bargate also notes the addition of the policy to include the word 'buildings' and does welcome this addition as it provides greater flexibility for achieving the proposed standards. However, Bargate retain their objection in that the there is no robust evidence to justify the requirements in Policy CN3 which go beyond the Future Homes Standard ('FHS') or Building Regulations as set out in earlier representations and hearing statements.</p> <p>Although Bargate acknowledges the inclusion of the term '<i>predictive</i>' in relation to the energy modelling, it remains of the view that, notwithstanding this wording, outline proposals will be unable to provide information that is sufficiently feasible or practical at this stage. As such, the requirement is considered unjustified for this type of development.</p> <p>The policy should be revised to state '<i>outline applications are not expected to undertake assessment of embodied carbon emissions.</i>'</p>

Officer Response	<p>Disagree with the comment that there is not a robust evidence base to support this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view this there is no need to amend the policy.</p> <p>Disagree with the comment that outline planning applications should be except from this policy. The whole purpose of Policy CN3 is that new development should demonstrate the lowest possible carbon emissions and if this key consideration is not addressed and considered at the earliest possible stage of the design process, it could be challenging to meet the requirement of the policy.</p> <p>Embodied carbon is not dealt with by Policy CN3 as this is addressed in Policy CN7. However, it would not be appropriate to exclude outline planning from either Policy CN3 or CN8 from embodied carbon assessments for the same reasons that have been stated above.</p>
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MM2040 41 - Home Builders Federation

Name	Mr Mark Behrendt
Representor Number	MM2040 41
Representation Number	MM2040 41-3
Representation Summary	<ul style="list-style-type: none"> • The Home Builders Federation (HBF) consider this policy to be unjustified and inconsistent with national policy. • The HBF argues that the policy contradicts national policy by requiring space heating and energy consumption standards. • While acknowledging limited weight can be given to the draft NPPF, the HBF uses it to demonstrate the government's position against the "creep of building standard into planning policy". • The approach is already inconsistent with the Written Ministerial Statement (WMS) without sufficient justification for departure the HBF continue to consider it necessary for the policy to be deleted.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>HBF continue to consider this policy to be unjustified as it is inconsistent with national policy in seeking to require space heating standards and energy consumption standards. It is notable that the draft NPPF states in policy PM13: Setting Standards that “Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements¹⁸, parking and design and placemaking ...” and that such standards should not cover matters which are already addressed by Building Regulations unless they relate to accessibility, water efficiency or space standards. The will also not cover matter relating to building construction or internal layouts.</p> <p>HBF recognises that limited weight can be given to the draft NPPF at this stage, but it does give an indication as to the Government’s position in relation to such policies and creep of building standard into planning policy. As the approach is already inconsistent with the WMS without sufficient justification for departure HBF continue to consider it necessary for the policy to be deleted.</p>
Officer Response	<p>Disagree. There has been a robust evidence base to support this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view this there is no need to amend the policy.]</p> <p>The Government's proposed changes to the NPPF are currently being consulted until the middle of March 2026. The Local Plan Inspector has confirmed that this Local Plan is being assessed against the 2023 NPPF. In any event, the proposed changes to the NPPF can only be given limited weight.</p>

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-1
Representation Summary	<p>Concerned that the scale of step change proposed may be too stretching in practice for the construction industry to adapt to and a phased approach is preferred.</p> <p>The policy needs to strike a better balance in terms of ambitions versus affordability and feasibility.</p> <p>There are also practical issues around whether a local approach will be onerous to assess and apply in practice due to the technical complexities.</p> <p>Delivering improvements to energy efficiency through building regulations has particular advantages over delivering varying approaches across the country.</p>

	<p>The Future Homes standard is to be introduced nationally from 2025, including an uplift in standards in Building Regulations, to ensure that new homes built from this time achieve 75-80% less carbon emissions than homes delivered under the old regulations.</p> <p>It is not open for LPAs to go beyond existing and forthcoming standards, WMS and High Court Judgement etc</p> <p>Bloor Homes objects to Policy CN3 in relation to outline applications as it is unlikely to be feasible or practical to provide such information at this stage, as insufficient detail may be known to enable such information to be provided in a meaningful way.</p> <p>A number of changes have been submitted to the wording of Policy CN3.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>The commitment of the Council to offer leadership for the district to be carbon neutral by 2030 is noted, ahead of the UK’s legally binding target of 2050. To achieve this in practice very challenging local standards continue to be put forward in the draft policy.</p> <p>Bloor Homes is concerned that the scale of step change proposed may be too stretching in practice for the construction industry to adapt to and a phased approach is preferred to ensure that change is deliverable. The policy needs to strike a better balance in terms of ambitions versus affordability and feasibility.</p> <p>There are also practical issues around whether a local approach will be onerous to assess and apply in practice due to the technical complexities. Generally, an approach that links to national standards and regulations is preferred which apply across local authority boundaries and provides for consistency in the market. Delivering improvements to energy efficiency through building regulations has particular advantages over delivering varying approaches across the country, in that it provides a single approach that all developers understand and can be rolled out at scale.</p> <p>As noted at paragraph 4.22 of the consultation document, the Future Homes standard is to be introduced nationally from 2025, including an uplift in standards in Building Regulations, to ensure that new homes built from this time achieve 75-80% less carbon emissions than homes delivered under the old regulations. Given that the earliest that the Local Plan will be adopted is October 2025 a phased approach which includes standards applicable from 2025 (in line with the Future Homes standard) should be considered. This is to ensure that the policy is deliverable over the plan period. Furthermore, these standards are in line with meeting the 2050 net zero target.</p> <p>If the local plan is to go beyond existing and forthcoming standards, it must ensure that policy requirements are consistent with national policy and with the December 2023 Minister of State for Housing Ministerial Statement. Furthermore, it must</p>

take account of the High Court Judgement of 2nd July 2024 [2024] EWHC 1693 Admin which confirms that the WMS is lawful and that measures for energy efficiency standards and energy requirements are those set out in the WMS and FHS i.e. Target Emission Rates (TER) and that it was not open to local authorities to choose measures other than this. The High Court Judgement, with its intention to prevent the application of inconsistent standards. Bloor Homes considers that use It is noted that at paragraphs 5.8 to 5.10 of the Carbon Neutrality and Embodied Carbon Topic Paper, the Council advises that it wrote to the Secretary of State expressing concern that the Written Ministerial Statement restricted the ability to set energy performance standards other than through TER, measured through the Standard Assessment Procedure (SAP). The response received confirms that whilst local plan makers are not precluded from setting standards that go further than Building Regulations, this must be *“in a way that is coherent and easily understandable for housebuilders”*.

The impact of the additional requirements set out in draft Policy CN3 on the viability and deliverability of development must be demonstrated to have been fully considered and be acceptable, Bloor Homes does not consider to be the case. Whilst it is acknowledged that some financial modelling of the cost implications of the additional requirements has been undertaken, Bloor Homes does not consider that the costs of implementation of the draft policy have been fully and properly considered and underestimates the true cost of this policy, it is not therefore justified

The draft policy also includes on-site renewable energy generation requirements that appear overly prescriptive for certain types of sites. The installation of effective solar generation, for example, will not be feasible for every site – due to shading, site size or heritage considerations, for example. In these circumstances it may simply not be possible to achieve net-zero operational carbon on-site and off-site renewable energy generation and offsets may be necessary. The policy is currently silent on these aspects, but they may need to be considered as part of the phased approach to introducing the local standards so that the policy can be effective. In addition, there is a lack of recognition that there is often a mismatch between renewable electricity generation and consumption, particularly during winter months, which has the potential to limit the ability to balance demand with generation.

Bloor Homes objects to the imposition of the requirement in draft Policy CN3 to provide energy model and calculations in relation to outline applications. It is unlikely to be feasible or practical to provide such information at this stage, as insufficient detail may be known to enable such information to be provided in a meaningful way. Bloor Homes consider that such information should be provided at the detailed stage of the application process. The policy should be revised to state that *outline applications are not expected to undertake assessment of embodied carbon emissions*.

Draft Policy CN3 also fails to recognise the Government’s commitment to decarbonize electricity generation by 2035 and the requirement for gas boilers to be banned from 2035. Given that the plan is intended to run to 2040, this should be acknowledged within supporting text and provision made within the application of this policy for the achievement of these targets and also future changes to legislative requirements and national policy related to climate change targets.

In light of the above Bloor Homes objects to draft Policy CN3 and requests that it is amended.

Proposed change:

All new-residential development:

All new residential development buildings (excluding conversion and change of use) should not burn any fossil fuels on site for space heating, hot water or used for cooking. New residential development **should aim to deliver** net-zero operational carbon on site by ensuring:

i. The predicted space heating demand of the homes based on predicted energy modelling, showing that the target of <15 kWh/M2/year is met.

iii. Compliance with the requirements of the 2025 Future Homes Standard, maximising opportunities to reduce energy demand, energy consumption and carbon emissions.

v. Onsite renewables to provide **maximise onsite energy generation up to 100%** of the energy consumption that is required by residential buildings, for example through the installation of photovoltaic solar panels or other suitable forms of renewable energy generating schemes that are appropriate for the location or the setting,

subject to export capacity being available and design

aspirations being met. New non-residential development:

v. New non-residential development (excluding conversion and change of use) should meet the 'BREEAM Excellent' standard or an agreed equivalent industry standard assessment process. Developers that propose a scheme to meet BREEAM standards should submit a post construction assessment and BREEAM certificate to the local planning authority to demonstrate compliance. At outline planning application stage, a commitment to BREEAM Excellent should be made, and at full planning application a BREEAM pre-assessment should be provided

All new non-residential developments should maximize on-site renewable energy generation, **subject to export capacity being available and design aspirations being met.**

As a minimum, applicants will be expected to submit the following information as part of their planning application detailing the type of renewable energy system proposed, **the total installed capacity onsite (kWp) and estimated total generation (kWh/year), in addition to design details of the proposed renewable energy system and how it is integrated within the development.**

Meeting the policy:

Energy strategy should outline compliance with the policy requirements. The following table indicates the energy modelling and calculation requirements at different planning application stages.

Requirements – Predictive Energy Modelling/ Energy Use Intensity (EUI) calculations

Pre-App - Modelling not required, but confirmation of how Policy CN3 will be met.

Outline - **Modelling not required, but confirmation of how Policy CN3 will be met.**

Full Planning & Reserved Matters - Representative sample of exact dwelling/building design.

Officer Response	<p>Disagree. There has been a robust evidence base to support the wording of this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view this there is no need to amend the policy.</p> <p>Disagree with the comment that outline planning applications should be except from this policy. The whole purpose of Policy CN3 is that new development should demonstrate the lowest possible carbon emissions and if this key consideration is not addressed and considered at the earliest possible stage of the design process, it could be challenging to meet the requirement of the policy.</p>
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-17
Representation Summary	<p>Acknowledges some positive aspects of the Council's policy modifications but ultimately objects to Policy CN3 requirements, particularly regarding carbon emissions standards and outline applications.</p> <p>Recognizes the Council's carbon neutrality commitment and welcomes the inclusion of "buildings" for greater flexibility, they maintain their objection to requirements exceeding national standards and consider the policy unjustified for outline proposals.</p> <p>Objects to Policy CN3 requirements that exceed the Future Homes Standard and Building Regulations, arguing there is insufficient evidence to justify these enhanced local standards.</p> <p>Despite the inclusion of "predictive" energy modelling, the respondent believes outline proposals cannot feasibly provide the required information at early planning stages.</p> <p>A specific recommendation is made to explicitly exempt outline applications from embodied carbon emissions assessments, suggesting this would make the policy more practical and justified.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>The commitment of the Council to offer leadership for the district to be carbon neutral by 2030 is noted, ahead of the UK's legally binding target of 2050. Blenheim also notes the addition of the policy to include the word 'buildings' and does welcome this addition as it provides greater flexibility for achieving the proposed standards. However, Blenheim retain their objection in that there is no robust evidence to justify the requirements in Policy CN3 which go beyond the Future Homes Standard ('FHS') or Building Regulations as set out in earlier representations and hearing statements.</p> <p>Although Blenheim acknowledges the inclusion of the term '<i>predictive</i>' in relation to the energy modelling, it remains of the view that, notwithstanding this wording, outline proposals will be unable to provide information that is sufficiently feasible or practical at this stage. As such, the requirement is considered unjustified for this type of development.</p> <p>The policy should be revised to state '<i>outline applications are not expected to undertake assessment of embodied carbon emissions.</i>'</p>
Officer Response	<p>Disagree with the comment that there is not a robust evidence base to support this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view of this there is no need to amend the policy.</p> <p>Disagree with the comment that outline planning applications should be except from this policy. The whole purpose of Policy CN3 is that new development should demonstrate the lowest possible carbon emissions and if this key consideration is not addressed and considered at the earliest possible stage of the design process, it could be challenging to meet the requirement of the policy.</p> <p>Embodied carbon is not dealt with by Policy CN3 as this is addressed in Policy CN7. However, it would not be appropriate to exclude outline planning from either Policy CN3 or CN8 from embodied carbon assessments for the same reasons that have been stated above.</p>

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-6
Representation Summary	Notes that proposed amendments to the NPPF and Planning & Energy Act 2008 may limit local authorities' ability to set higher energy efficiency standards. While Policy CN2's targets might remain, their implementation could be hindered by national legislation changes.

	<p>Expected publication in January 2026 will bring significant changes to energy efficiency standards. Expected additions and amendments to this include:</p> <ul style="list-style-type: none"> · A new software tool to assess domestic energy use, costs and associated carbon emissions; the Home Energy Model (HEM), which will replace the Standard Assessment Procedure (SAP) and provide more accurate predictions of domestic energy consumption and allow integration of new energy saving technologies. · The inclusion of rooftop solar panels for the notional dwelling to reduce energy bills and reliance on grid electricity. · The exclusion of gas-fired boilers for heating and hot water to ensure that no future energy related retrofits are required.
<p>Full Representation</p>	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>In addition to the above comments, however, it is worth noting that in December 2025, the UK Government launched a consultation to amend the NPPF to include both plan making and development management policy guidance¹⁰. Whilst this guidance will only apply to new Local Plans being drafted once the new NPPF is adopted, the underlying policy guidance has the potential to impact WCC’s policy CN2 and the associated use of energy use intensity targets. The supporting guidance the draft NPPF policy PM13 states that, “The policy as drafted would limit local standards for energy efficiency, as we are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. If this specific restriction were to be taken forward following consultation, we intend to use secondary legislation to commence section 43 of the Deregulation Act 2015 to amend the Planning & Energy Act 2008 to make clear that local plans should not set higher energy efficiency standards for residential development. The draft Framework policy would also replace the policy contained in the 2023 Written Ministerial Statement titled Planning – Local Energy Efficiency Standards Update.”</p> <p>2.9 Therefore, it is worth considering that whilst the proposed amendments to the NPPF are unlikely to impact the targets set by policy CN2, the amendments to the Planning & Energy Act 2008 may inhibit their implementation.</p> <p>2.10 This may be further clarified by the introduction of the Future Homes and Buildings Standard, which is expected to be published in January 2026. Whilst this relates primarily to energy efficiency standards implemented by Building Control, as opposed to Planning departments, it will demonstrate a significant step-change for the industry in aligning the delivery of new homes with the national Net Zero Carbon strategy, and will confirm the expected specification of new homes that will ensure the delivery of the national 2050 Net Zero Carbon objective. Expected additions and amendments to this include:</p> <ul style="list-style-type: none"> ☒ A new software tool to assess domestic energy use, costs and associated carbon emissions; the Home Energy Model (HEM), which will replace the Standard Assessment Procedure (SAP) and provide more accurate predictions of domestic energy consumption and allow integration of new energy saving technologies. ☒ The inclusion of rooftop solar panels for the notional dwelling to reduce energy bills and reliance on grid electricity.

	<p>☒The exclusion of gas-fired boilers for heating and hot water to ensure that no future energy related retrofits are required.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf</p>
<p>Officer Response</p>	<p>Whilst the comments are noted, public consultation on the Government's proposed changes to the NPPF does not close until the middle of March 2026. Even if the Government's proposed changes to the NPPF (PM13) goes through into the final version of the NPPF, there would then need to be changes in secondary legislation which has not happened.</p> <p>There is a robust evidence base to support this policy. All of the evidence base to support Policy CN3 has been published on the City Council's LP Examination website (including a Local Plan Viability Assessment, Topic Paper and a range of other evidence). The merits of Policy CN3 was discussed at length at the hearing session on Carbon Neutrality.</p> <p>The Inspector's note ED38a agrees with the City Council's approach to Policy CN3 (and CN1) and states that based on the evidence before the Inspector, the approach to CN1 and CN3, subject to MM's is consistent with national policy, justified and effective. In view this there is no need to amend the policy.</p>

MM11 (Policy CN5)

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-7
Representation Summary	<p>Clarification is required with regard to the definition of word 'significant' in relation to adverse impacts.</p> <p>How adverse impacts will be assessed without a clear definition of what constitutes 'significant'?</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>A definition for 'significant' would seem to be missing. If that is intentional please explain how adverse impacts will be assessed?</p>
Officer Response	<p>Disagree. The National Planning Policy Framework (NPPF) defines significance as "the value of a heritage asset to this and future generations because of its heritage interest". It defines four types of heritage interest: historic, architectural, artistic and archaeological. In view of this there is no need to define this term in the Local Plan.</p>

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-3
Representation Summary	<p>Modifications MM11 and MM12 also take account of the potential impact on heritage assets from renewable and low carbon energy generation schemes. MM12 also includes an additional need to account for emergency planning for energy storage facilities. Again, Bloor is supportive of these modifications.</p>

Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Modifications MM11 and MM12 also take account of the potential impact on heritage assets from renewable and low carbon energy generation schemes. MM12 also includes an additional need to account for emergency planning for energy storage facilities. Again, Bloor is supportive of these modifications.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf</p>
Officer Response	<p>Support welcomed.</p>

MM12 (Policy CN6)

MM2040 29 - Historic England

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-4
Representation Summary	Historic England request the wording of criterion i in Policy CN6 is changed to: i There is not an <u>significant</u> unacceptable impact on heritage significance or on the natural environment;
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>I do not think the wording proposed was suggested by Historic England, though we did flag in our response at Regulation 19 the scope to align wording on heritage considerations in CN5 and CN6. We recommend a final review of this wording.</p> <p>Supporting Information</p> <p>1. Historic England - 20260115_Winchester_LP_mainmods_consultation_GRHE_response_Redacted.pdf</p>
Officer Response	Disagree. The wording of this criterion had been previously agreed with Historic England. The additional changes to the text are not needed for the purposes of soundness.

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-6

Representation Summary	Is consideration/eligibility of 'small scale biomass schemes' appropriate given National and Councils 'Air Quality' and 'Health' concerns. Plus, 'Climate Change' which is underpinned by WCC AQ Strategy, Climate and Nature Emergency declarations with Councils CNAP and Nature Improvement Plan?
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Is consideration/eligibility of 'small scale biomass schemes' appropriate given National and Councils 'Air Quality' and 'Health' concerns. Plus, 'Climate Change' which is underpinned by WCC AQ Strategy, Climate and Nature Emergency declarations with Councils CNAP and Nature Improvement Plan?</p>
Officer Response	Disagree. Policy CN6 covers the issues that a small scale biomass scheme would need to address. It is important that the Local Plan is read as a whole as there are other policies in the Local Plan such as Policy D7 (Development Standards) that deal with a range of other issues that a proposal for a small scale biomass scheme would need to address.

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-4
Representation Summary	Modifications MM11 and MM12 also take account of the potential impact on heritage assets from renewable and low carbon energy generation schemes. MM12 also includes an additional need to account for emergency planning for energy storage facilities. Again, Bloor is supportive of these modifications.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Modifications MM11 and MM12 also take account of the potential impact on heritage assets from renewable and low carbon energy generation schemes. MM12 also includes an additional need to account for emergency planning for energy storage facilities. Again, Bloor is supportive of these modifications.</p>

	20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf
Officer Response	Support welcomed.

MM13 (Policy CN7)

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-5
Representation Summary	Modification MM13 relates to policy CN7 (Energy Storage) and Bloor makes no comment on this.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Modification MM13 relates to policy CN7 (Energy Storage) and Bloor makes no comment on this.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations_Redacted.pdf</p>
Officer Response	Support noted.

MM14 (Policy D1)

MM2040 4 - XR Winchester / Save Bushfield Camp

Name	Mr Ben Marsh
Representor Number	MM2040 4
Representation Number	MM2040 4-3
Representation Summary	Support for amendments to paragraph 5.38 and 5.40.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>1. Strong Support for Amendment to Paragraph 5.38</p> <p>I strongly support the amendment to Paragraph 5.38 which explicitly adds "<i>height, scale, massing</i>" and "<i>views</i>" to the list of contextual factors that must be assessed.</p> <p>This modification is essential to ensure the Local Plan is consistent with National Policy (NPPF) regarding the protection of valued landscapes and the setting of National Parks.</p> <ul style="list-style-type: none"> • Application to Policy W5 (Bushfield Camp): As noted by the South Downs National Park Authority in their representations, development at Bushfield Camp has the "<i>real potential to be harmful</i>" to key views, specifically the panoramic view from St Catherine's Hill. • Visual Impact: By codifying "<i>height, scale, and massing</i>" as mandatory assessment factors, this modification provides the necessary policy mechanism to prevent intrusive development that breaks the skyline or degrades the rural backdrop of the City. • Protected Features: I also support the inclusion of "<i>protected features</i>" in the list. For Bushfield Camp, this must be interpreted to include the designated Site of Importance for Nature Conservation (SINC) which forms the central developable footprint. A design solution that destroys a "protected feature" (the SINC) cannot be considered a "positive response" to context. <p>2. Support for Amendment to Paragraph 5.40</p> <p>I support the inclusion of relevant national guidance, including Sport England Active Design Guidance.</p>

	<ul style="list-style-type: none"> • Observation: To be effective at Bushfield Camp, "Active Design" must be balanced against ecological sensitivity. While active travel is encouraged, new routes must not increase recreational pressure on the sensitive River Itchen SAC or the on-site SINC habitats. <p>3. Conclusion</p> <p>These modifications are vital for the soundness of the Plan's design policies. They ensure that "good design" is not just aesthetic but respects the physical constraints of sensitive landscape settings and protected biodiversity features.</p>
Officer Response	Agreed.

MM2040 46 - Mr Owen Neal

Name	Mr Owen Neal
Representor Number	MM2040 46
Representation Number	MM2040 46-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Sport England welcomes the inclusion of the main modification to insert reference to Sport England's Active Design guidance. This will support the creation and design of spaces and places which promote movement and physical activity, helping to deliver healthy communities.</p>
Officer Response	Agree no further amendment is necessary

MM15 (Policy D2)

MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-7
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It is not clear which Statement of Community Involvement (SCI) is being referred to in the policy given that many of these plans predated the current SCI.</p>
Officer Response	<p>Documents can only be prepared in accordance with the Statement of Community Involvement in place at that time. it is not anticipated that changes in requirements for community consultation will significantly impact upon the weight to be given to the documents listed in this policy.</p> <p>Consider no change to the modification necessary.</p>

MM17 (Policy D4)

MM2040 13 - South Wonston Parish Council

Name	Mrs Ann Peal
Representor Number	MM2040 13
Representation Number	MM2040 13-2
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>In accordance with our representation ANON-AQTS-3B55-R, we consider the addition of the words "in accordance with the Statement of Community Involvement in MM17 to make the proposed modification legally compliant and sound.</p>
Officer Response	<p>This comment was recorded on the consultation portal under MM18. however, it clearly refers to MM17 and has been considered as such.</p> <p>Agree MM17 is appropriate and would result in a sound approach. No further amendment is considered necessary in this regard.</p>

MM2040 28 - Wickham Residents Association

Name	Mr Geoffrey Burton
Representor Number	MM2040 28
Representation Number	MM2040 28-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	add to ii. <u>Neighbourhood Plans and Village Design Plans</u>
Officer Response	Disagree with the proposed addition. While the sentiment is understood, when "made", Neighbourhood Plans form part of the Development Plan for the area and therefore decision makers are required to take their policies into account whether they are mentioned in the Local Plan or not. Other documents, such as Village Design Statements are already included in the proposed Policy D4. On balance, it is thought better to leave Neighbourhood Plans out of this policy to avoid any potential confusion.

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>This sentence should include Neighbourhood Plans:</p> <p><i>Any relevant aspects, identified characteristics and principles set out in, Village Design Statements, Neighbourhood Plans, Conservation Area Appraisals and Management Plans, Local Area Design Codes, Planning Frameworks and Design Codes</i></p>
Officer Response	Disagree with the proposed addition. While the sentiment is understood, when "made", Neighbourhood Plans form part of the Development Plan for the area and therefore decision makers are required to take their policies into account whether they are mentioned in the Local Plan or not. On balance, it is thought better to leave Neighbourhood Plans out of this policy to avoid any potential confusion.

MM18 (Policy D5)

MM2040 4 - XR Winchester / Save Bushfield Camp

Name	Mr Ben Marsh
Representor Number	MM2040 4
Representation Number	MM2040 4-2
Representation Summary	<p>Support amendment to criterion xii.</p> <p>Object to deletion of final paragraph requiring a management plan, on grounds that it does not provide sufficient certainty and is not unreasonable at this stage</p> <p>Object to proposed wording of paragraph 5.71, stating it should define the weight of a Concept Masterplan relative to the Local Plan, ensuring it is consistent with the Plan and does not override environmental protections.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>1. Support for Amendment to Criterion xii (Green and Blue Infrastructure)</p> <p>I strongly support the amendment to Criterion xii requiring a strategy that takes <i>"advantage of opportunities for off-site links to the countryside, South Downs National Park where applicable..."</i></p> <p>This modification is essential to make the Plan consistent with National Policy regarding the setting of National Parks.</p> <ul style="list-style-type: none"> • Observation for Effectiveness: To be effective at Bushfield Camp (Policy W5), this strategy must acknowledge the site's specific constraints. The site functions as a vital "stepping stone" to the SDNP. • The SINC Constraint: However, the strategy must not conflate "infrastructure" with "development." The central part of Bushfield Camp is a designated SINC (Existing High Biodiversity Value). A valid Green Infrastructure Strategy must explicitly state that "links to the SDNP must be achieved without degrading the integrity of on-site designated habitats (SINCs)." Without this clarification, the policy risks encouraging engineered infrastructure on top of protected chalk grassland. <p>2. Objection to Deletion of Final Paragraph (Management Plan)</p>

	<p>I object to the deletion of the final paragraph which previously required a <i>"management plan... to demonstrate how infrastructure and community assets will be maintained."</i> The Council's reason—that this is <i>"unreasonable at concept masterplan stage"</i>—is Unsound and Not Justified.</p> <ul style="list-style-type: none"> • Financial Certainty: For complex sites like Bushfield Camp, the "Concept" relies heavily on mitigation (e.g., for Nutrients and Biodiversity Net Gain). If there is no Management Plan at the concept stage, there is no proof that the proposed mitigation is financially viable or secure in perpetuity. • Nutrient Neutrality Link: Given the concerns regarding the funding and longevity of nutrient mitigation schemes (Policy NE16), removing the requirement to demonstrate <i>how</i> assets will be managed at the masterplan stage removes the "certainty" required by the Habitats Regulations. • Remedy: The paragraph should be reinstated. It is not "unreasonable" to ask a developer to prove they can afford to maintain the massive infrastructure they are proposing <i>before</i> the concept is endorsed. <p>3. Objection to Paragraph 5.71 (Status of Concept Masterplans)</p> <p>I object to the text in Paragraph 5.71 stating: <i>"For significant development sites, a Concept Masterplan is required, to be agreed with the Council and endorsed as a material planning consideration..."</i></p> <p>This text is Not Effective because it does not define the weight of a Concept Masterplan relative to the Local Plan.</p> <ul style="list-style-type: none"> • The Risk: There is a risk that a Concept Masterplan (such as the one endorsed for Bushfield Camp in June 2023) may contain elements that conflict with adopted Local Plan policies (e.g., building on a SINC contrary to Policy CP16). • Remedy: The text must be amended to state: <i>"...endorsed as a material planning consideration, provided that the Concept Masterplan is fully consistent with the policies of the adopted Local Plan."</i> This ensures that a "Concept" cannot override statutory environmental protections.
<p>Officer Response</p>	<p>Agree support for amendment to criterion xii.</p> <p>Disagree with proposed reinstatement of final paragraph requiring a Management Plan. This is considered unreasonable at this point, and is not necessary to deliver the required certainty that necessary environmental protections will be secured.</p> <p>Disagree with the proposed requirement that the Concept Masterplan is fully consistent with the policies of the adopted Local Plan. This is not necessary to ensure that the masterplan cannot override statutory environmental protections.</p>

MM2040 20 - Cllr David Tozer

<p>Name</p>	<p>Cllr David Tozer</p>
<p>Representor Number</p>	<p>MM2040 20</p>
<p>Representation Number</p>	<p>MM2040 20-3</p>

Representation Summary	<p>The proposed deletion of the sentence referring to management plans makes it unclear when such plans are expected to be presented. This sentence should be replaced with the following:</p> <p>'Although the master planning process is not required to demonstrate how infrastructure and community assets will be maintained and managed, it is expected that such plans will need to be submitted as part of the Outline Planning Application'.</p> <p>N.B. The amendments in criterion xii to add in references to 'blue' infrastructure etc are an improvement.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The proposed deletion of the sentence referring to management plans makes it unclear when such plans are expected to be presented. It would be clearer to replace this sentence with the following:</p> <p>Although the master planning process is not required to demonstrate how infrastructure and community assets will be maintained and managed, it is expected that such plans will need to be submitted as part of the Outline Planning Application.</p> <p>N.B. The amendments in criterion xii to add in references to 'blue' infrastructure etc are an improvement.</p>
Officer Response	<p>Disagree. This is outside the scope of the masterplan and it appears to be straying into material that would be needed to support an outline planning application (which has different requirements when compared to a planning application for Full Planning permission).</p> <p>Support welcomed for amendments to criterion xii.</p>

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-2
Representation Summary	<ul style="list-style-type: none"> The requirement for concept plans has "no legislative basis" and contradicts National Planning Policy Framework paragraph 41, which states developers cannot be required to engage pre-application.

	<ul style="list-style-type: none"> • The threshold for "significant development" is insufficiently defined, creating uncertainty and introduces subjective elements into the planning process. • Concerns are raised about capacity constraints within in local authority planning departments, with mandatory pre-application discussions potentially causing delays that could affect development viability and housing delivery timelines. <p>The wording should therefore be amended to:</p> <p><i>'5.71 For significant development sites, a Concept Masterplan is <u>encouraged</u> to be agreed with the Council and endorsed as a material planning consideration, prior to the submission of a planning application <u>through the pre-application process</u>. The Council will seek to engage with landowners and developers through this master planning approach as part of a Planning Performance Agreement.'</i></p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Concerns are raised in relation to the requirement for <i>significant developments</i> to prepare concept plans and secure agreement with the Council prior to the submission of a planning application. There is no legislative basis for mandating such an approach, and it is therefore considered inappropriate for this to be framed as a requirement. This position is reinforced by Winchester City Council's own website, which explicitly recognises pre-application advice as an <i>optional</i> service rather than a compulsory stage in the planning process. Accordingly, the preparation of concept plans should be positioned as an encouraged and voluntary route, rather than a prerequisite to validation or determination. Furthermore, the threshold for what constitutes a <i>significant development</i> is insufficiently defined, creating uncertainty for applicants. The policy also notes that this threshold would be determined by the Council at the pre-application stage, introducing an additional layer of subjectivity and unpredictability into the development process.</p> <p>While pre-application engagement is widely acknowledged as beneficial and is appropriately encouraged, it is not a mandatory component of the planning system. Paragraph 41 of the NPPF is clear in stating that local planning authorities "<i>cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer.</i>" In this context, any policy wording that implies a requirement for pre-application engagement would be inconsistent with national policy. Moreover, current capacity constraints and extended waiting times within local authority planning departments mean that requiring pre-application discussions could lead to delays in the submission and determination of planning applications. This, in turn, risks adversely affecting development viability and the timely delivery of much-needed housing.</p>

	<p>Lastly, Blenheim welcomes the removal of the requirement to management plans being required as part of the masterplanning process due to this being unreasonable.</p> <p>The wording should therefore be amended to:</p> <p><i>'5.71 For significant development sites, a Concept Masterplan is <u>encouraged</u> to be agreed with the Council and endorsed as a material planning consideration, prior to the submission of a planning application through the <u>pre-application process</u>. The Council will seek to engage with landowners and developers through this master planning approach as part of a Planning Performance Agreement.'</i></p>
Officer Response	<p>Disagree. Whilst it is accepted the wording in the NPPF regarding pre-application advice, whether or not a proposal needs to prepare a Concept Masterplan is considered to be a matter that should be decided by the City Council. This would always be undertaken in consultation with the applicant as part of the pre-application process (which is always encouraged for complicated sites) and the reasons would be given as to why a site requires a Concept Masterplan. The City Council fully accepts that not all proposals will require a Concept Masterplan nor would Officers want this happen.</p>

MM2040 25 - Kennedy Wilson

Name	Mr Lawrence Clark
Representor Number	MM2040 25
Representation Number	MM2040 25-1
Representation Summary	<ul style="list-style-type: none"> • Contradictions between paragraphs 5.70 and 5.72a regarding when masterplans are required. • While one states masterplan requirements are identified in site allocations, the other suggests the Council can determine requirements during pre-application engagement, creating uncertainty. • The respondent argues that if a site allocation (such as SH4) doesn't explicitly require a masterplan, then one shouldn't be requested later. They believe this creates unnecessary uncertainty for sites with established planning history. • There are ongoing concerns about what constitutes a Concept Masterplan, its status, consultation processes, and how disagreements would be resolved, which have not been adequately addressed in the modifications. • The respondent requests clearer distinction between requirements for allocated and non-allocated sites, with better transparency regarding expectations for applicants in different circumstances.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Knight Frank, on behalf of Kennedy Wilson (KW) Forum Ltd, who are landowners at Solent Business Park, have been actively engaged in the Local Plan examination and have submitted representations at Regulation 18 Stage (Ref. ANON-KSAR-NKFC-K), Regulation 19 Stage (Ref. ANON-AQTS-32G3-R), and at the Local Plan Hearing Statements (Ref. ANON-AQTS-32G3).</p> <p>Previous representations submitted regarding Policy D5 raised a number of questions including the status of the masterplan sought by this policy, whether consultation was required, the resourcing required to prepare an informal masterplan, stakeholder engagement, and the right to appeal.</p> <p>Whilst revisions to the Policy wording address some of these concerns, there remains ambiguity on the circumstances in which a masterplan is required. For example, paragraph 5.70 states, <i>“site allocations in this Plan identify where a Masterplan is required to support planning applications and indicate the scope of what is required.”</i> However, paragraph 5.72a then states, <i>“the City Council will determine whether a development site qualifies as Significant Development and requires a concept masterplan as part of any pre-application engagement.”</i></p> <p>Our understanding based on communications with the Council is that allocated sites may still be required to produce a Concept Masterplan, even if a site allocation does not identify a masterplan requirement, as is the case for Site Allocation SH4. This creates uncertainty and lacks clarity. Policy should be clear and unambiguous which we do not consider the proposed wording to be.</p> <p>Currently Site Allocation SH4 does not require a masterplan as per the draft text. Given the long history of planning applications and public consultation as a result of these on the Site, this not seeking a specific masterplan makes sense and is a proportionate approach. The wording at para 5.72 though still introduces the possibility that the applicant may be asked to prepare one. Given the various questions we have raised previously in respect of what a Concept Masterplan is, its status, the consultation process, resolution of issues/disagreements and so on, this level of uncertainty is not helpful.</p> <p>In our opinion, if the Site Allocation policy doesn’t seek a masterplan, that should be the conclusion. For non-allocated sites that propose major development, the potential requirement for a Concept Masterplan would be more acceptable, and understandable.</p> <p>We request this distinction is made, and that the wording of the policy and sub-text is amended to create better clarity and transparency as to what is expected of applicants, and in what circumstances.</p>
<p>Officer Response</p>	<p>Disagree. Whether or not a proposal needs to prepare a Concept Masterplan is considered to be a matter that should be decided by the City Council. This would always be undertaken in consultation with the applicant as part of the pre-application process (which</p>

	is always encouraged for complicated sites) and the reasons would be given as to why a site requires a Concept Masterplan. The City Council fully accepts that not all proposals will require a Concept Masterplan nor would Officers want this happen.
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MM2040 27 - The Church Commissioners for England

Name	Miss Nuala Wheatley
Representor Number	MM2040 27
Representation Number	MM2040 27-2
Representation Summary	<ul style="list-style-type: none"> • The Commissioner's are pleased to see that clarity has been provided, in line with their representations, confirming timescales for Concept Masterplans. • It is noted that these are to be agreed with the Council prior to the submission of a planning application and subsequently endorsed as a material planning consideration. • The additional text at paragraph 5.70 confirms that the site allocations within the Plan identify where a Masterplan is required to support planning applications and indicate the scope of what is required. It goes on to explain the Policy D5 applies to 'any significant development site' i.e. major applications for 'significant' development that are not subject to an allocation which requires a Masterplan to be produced. • Consider that these amendments remove the repetition between Policies D5 and W5.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The Commissioners are pleased to see that clarity has been provided, in line with their representations, confirming timescales for Concept Masterplans. It is noted that these are to be agreed with the Council prior to the submission of a planning application and subsequently endorsed as a material planning consideration. The additional text at paragraph 5.70 confirms that the site allocations within the Plan identify where a Masterplan is required to support planning applications and indicate the scope of what is required. It goes on to explain the Policy D5 applies to 'any significant development site' i.e. major applications for 'significant' development that are not subject to an allocation which requires a Masterplan to be produced. We consider that these amendments remove the repetition between Policies D5 and W5.</p>
Officer Response	Support welcomed.

MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-5
Representation Summary	<ul style="list-style-type: none"> • The policy lacks clarity regarding when masterplans would be required, how they would be approved, what appeal rights exist, and how amendments could be made. • The relationship between Policy D5 and the Master Planning Approach to Concept Masterplans document has been raised. • Mandating pre-application engagement and Planning Performance Agreements is inappropriate as these impose additional costs. • The Master Planning Approach document was not subject to public consultation, raising questions about its status and changeability. • Concerns are raised that the policy would cause significant delays to development approval processes. • The requirement for site-wide concept masterplans for "significant development" is seen as problematic, particularly for institutions like Winchester College that have ongoing development programmes. • Winchester College objects to MM18, suggesting the policy would negatively impact their ability to undertake their continuous programme of works without unnecessary procedural burdens.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The policy as drafted remains ambiguous.</p> <p>It is not clear from the supporting text or draft Policy D5 when a masterplan would be required, how they would be agreed by the local planning authority, what right of appeal an applicant would have if they could not reach agreement or how they could be amended should needs change over time. It is not appropriate for a Local Plan to mandate a requirement for pre-application engagement or for an applicant to enter into a Planning Performance Agreement, both of which come with additional costs.</p> <p>The Master Planning Approach to Concept Masterplans was not subject to any form of public consultation and it is not clear what status this has or whether the Council's approach can be changed at any point. If this document is required to understand Policy D5, then it is clear that the policy is unsound as currently drafted.</p> <p>As drafted, Policy D5 is likely to result in significant delays to approving high quality and sustainable development as it requires that a site wide concept masterplan is developed for significant development on sites occupied by major</p>

	<p>landowners/users with input from the local planning authority and following community engagement in advance of submission of a planning application. Winchester College is subject to a continual programme of works, each of which could be considered a discrete project or alternatively as a phase of the wider development. If it were the latter, any development on the College estate would require the submission of a masterplan or to be in accordance with a previously approved masterplan.</p> <p>Winchester College object to MM18.</p>
Officer Response	<p>Disagree. Whether or not a proposal needs to prepare a Concept Masterplan would be undertaken on a case by case basis. This would always be undertaken in consultation with the applicant as part of the pre-application process (which is always encouraged for complicated sites) and the reasons would be given as to why a site requires a Concept Masterplan.</p> <p>The City Council fully accepts that not all proposals will require a Concept Masterplan nor would Officers want this happen. It is not intended that it would cover all development in the college and the City Council would always encourage the College to go down pre-application route for complicated sites/development as this can greatly assist with understanding and agreeing issues before an application is submitted and can save time.</p>

MM2040 36 - Taylor Wimpey Strategic Land

Name	Mr Jeremy Gardiner
Representor Number	MM2040 36
Representation Number	MM2040 36-1
Representation Summary	<ul style="list-style-type: none"> The second sentence of paragraph 5.71 in MM18 conflicts with paragraph 47 of the NPPF, which states that Planning Performance Agreements are voluntary rather than mandatory. The current wording could be interpreted as requiring all landowners and developers to enter into Planning Performance Agreements for every significant development site, which exceeds national guidance. <p>Recommended change:</p> <p>Deleting the second sentence of paragraph 5.71 entirely, as it is both contrary to national policy and unnecessary.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>The second sentence of paragraph 5.71 of MM18 is not sound because it is inconsistent with national policy, specifically it is inconsistent with paragraph 47 of the NPPF. It therefore conflicts with NPPF paragraph 36 d).</p> <p>The second sentence of paragraph 5.71 states: "The Council will seek to engage with landowners and developers through this masterplanning approach as part of a Planning Performance Agreement."</p> <p>As drafted, this could be interpreted as mandating that all landowners and developers <u>must</u> enter into a Planning Performance Agreement on every significant development site.</p> <p>NPPF paragraph 47 is clear that PPAs are voluntary and are likely to only be needed "for applications that are particularly large or complex to determine."</p> <p>The second sentence of paragraph 5.71 should therefore be deleted, as it conflicts with national policy and is otherwise unnecessary.</p>
Officer Response	<p>Disagree. Whilst it is accepted the wording in the NPPF regarding pre-application advice (which is voluntary), whether or not a proposal needs to prepare a Concept Masterplan is considered to be a matter that should be decided by the City Council. This would always be undertaken in consultation with the applicant as part of the pre-application process (which is always encouraged for complicated sites) and the reasons would be given as to why a site requires a Concept Masterplan. The City Council fully accepts that not all proposals will require a Concept Masterplan nor would Officers want this happen.</p>

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-12
Representation Summary	<p>Disagrees with the proposed modification, considering it unsound due to mandating pre-application concept plans.</p> <p>The MM contradicts Paragraph 41 of the NPPF, which states local authorities "cannot require" pre-application engagement. The Winchester City Council's own website describes pre-application advice as "optional" rather than compulsory.</p> <p>The threshold for what constitutes a "significant development" is highlighted as insufficiently defined, creating uncertainty. The subjective determination of this threshold by the Council adds unpredictability to the development process.</p> <p>Current capacity constraints and extended waiting times in planning departments could lead to delays if pre-application discussions become mandatory, potentially affecting development viability and timely housing delivery.</p> <p>Recommended rewording of paragraph 5.71:</p>

	<p>'5.71 For significant development sites, a Concept Masterplan is encouraged to be agreed with the Council and endorsed as a material planning consideration, prior to the submission of a planning application through the pre-application process. The Council will seek to engage with landowners and developers through this master planning approach as part of a Planning Performance Agreement.'</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Concerns are raised in relation to the requirement for <i>significant developments</i> to prepare concept plans and secure agreement with the Council prior to the submission of a planning application. There is no legislative basis for mandating such an approach, and it is therefore considered inappropriate for this to be framed as a requirement. This position is reinforced by Winchester City Council's own website, which explicitly recognises pre-application advice as an <i>optional</i> service rather than a compulsory stage in the planning process. Accordingly, the preparation of concept plans should be positioned as an encouraged and voluntary route, rather than a prerequisite to validation or determination. Furthermore, the threshold for what constitutes a <i>significant development</i> is insufficiently defined, creating uncertainty for applicants. The policy also notes that this threshold would be determined by the Council at the pre-application stage, introducing an additional layer of subjectivity and unpredictability into the development process.</p> <p>While pre-application engagement is widely acknowledged as beneficial and is appropriately encouraged, it is not a mandatory component of the planning system. Paragraph 41 of the NPPF is clear in stating that local planning authorities "<i>cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer.</i>" In this context, any policy wording that implies a requirement for pre-application engagement would be inconsistent with national policy. Moreover, current capacity constraints and extended waiting times within local authority planning departments mean that requiring pre-application discussions could lead to delays in the submission and determination of planning applications. This, in turn, risks adversely affecting development viability and the timely delivery of much-needed housing.</p> <p>Lastly, Bargate welcomes the removal of the requirement to management plans being required as part of the masterplanning process due to this being unreasonable. The wording should therefore be amended to:</p> <p><u>'5.71 For significant development sites, a Concept Masterplan is encouraged to be agreed with the Council and endorsed as a material planning consideration, prior to the submission of a planning application through the pre-application process. The Council will seek to engage with landowners and developers through this master planning approach as part of a Planning Performance Agreement.'</u></p>

Officer Response	Disagree. Whilst it is accepted the wording in the NPPF regarding pre-application advice, whether or not a proposal needs to prepare a Concept Masterplan is considered to be a matter that should be decided by the City Council. This would always be undertaken in consultation with the applicant as part of the pre-application process (which is always encouraged for complicated sites) and the reasons would be given as to why a site requires a Concept Masterplan. The City Council fully accepts that not all proposals will require a Concept Masterplan nor would Officers want this happen.
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MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-5
Representation Summary	<p>Recognizes that Policy D5 now clearly identifies which site allocations require a Masterplan.</p> <p>The main concern is that the policy and supporting text do not define what constitutes a 'significant site' that would require a Concept Masterplan, creating uncertainty for developers and planners.</p> <p>There should be clear thresholds to provide certainty about when Concept Masterplans are required.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>We acknowledge that the text of Policy D5 now identifies where site allocations require a Masterplan.</p> <p>However, the policy and its supporting text remain unclear on what constitutes a 'significant site' that would necessitate the preparation of a Concept Masterplan. A clear threshold should be established to provide certainty on when such masterplans are required.</p> <p><u>Proposed change:</u></p> <p>Please refer to the reasoning above.</p>

Officer Response	Disagree. It is not possible to provide this level of precision in Policy D5 as there are a number of variable in terms of the nature of the proposal and its context which can be assessed as part of the design process. The City Council offers a pre-application service and matters such as this can be discussed using this service.
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-9
Representation Summary	<p>Disagrees with the proposed modification, considering it unsound due to mandating pre-application concept plans.</p> <p>The MM contradicts Paragraph 41 of the NPPF, which states local authorities "cannot require" pre-application engagement. The Winchester City Council's own website describes pre-application advice as "optional" rather than compulsory.</p> <p>The threshold for what constitutes a "significant development" is highlighted as insufficiently defined, creating uncertainty. The subjective determination of this threshold by the Council adds unpredictability to the development process.</p> <p>Current capacity constraints and extended waiting times in planning departments could lead to delays if pre-application discussions become mandatory, potentially affecting development viability and timely housing delivery.</p> <p>Recommended rewording of paragraph 5.71:</p> <p>'5.71 For significant development sites, a Concept Masterplan is encouraged to be agreed with the Council and endorsed as a material planning consideration, prior to the submission of a planning application through the pre-application process. The Council will seek to engage with landowners and developers through this master planning approach as part of a Planning Performance Agreement.'</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Concerns are raised in relation to the requirement for <i>significant developments</i> to prepare concept plans and secure agreement with the Council prior to the submission of a planning application. There is no legislative basis for mandating such an approach, and it is therefore considered inappropriate for this to be framed as a requirement. This position is reinforced by Winchester City Council's own website, which explicitly recognises pre-application advice as an <i>optional</i> service rather than a compulsory stage in the planning process. Accordingly, the preparation of concept plans should be positioned as an encouraged and voluntary</p>

	<p>route, rather than a prerequisite to validation or determination. Furthermore, the threshold for what constitutes a <i>significant development</i> is insufficiently defined, creating uncertainty for applicants. The policy also notes that this threshold would be determined by the Council at the pre-application stage, introducing an additional layer of subjectivity and unpredictability into the development process.</p> <p>While pre-application engagement is widely acknowledged as beneficial and is appropriately encouraged, it is not a mandatory component of the planning system. Paragraph 41 of the NPPF is clear in stating that local planning authorities “cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer.” In this context, any policy wording that implies a requirement for pre-application engagement would be inconsistent with national policy. Moreover, current capacity constraints and extended waiting times within local authority planning departments mean that requiring pre-application discussions could lead to delays in the submission and determination of planning applications. This, in turn, risks adversely affecting development viability and the timely delivery of much-needed housing.</p> <p>Lastly, Blenheim welcomes the removal of the requirement to management plans being required as part of the masterplanning process due to this being unreasonable.</p> <p>The wording should therefore be amended to:</p> <p><i>‘5.71 For significant development sites, a Concept Masterplan is encouraged to be agreed with the Council and endorsed as a material planning consideration, prior to the submission of a planning application through the pre-application process. The Council will seek to engage with landowners and developers through this master planning approach as part of a Planning Performance Agreement.’</i></p>
<p>Officer Response</p>	<p>Disagree. Whilst it is accepted the wording in the NPPF regarding pre-application advice, whether or not a proposal needs to prepare a Concept Masterplan is considered to be a matter that should be decided by the City Council. This would always be undertaken in consultation with the applicant as part of the pre-application process (which is always encouraged for complicated sites) and the reasons would be given as to why a site requires a Concept Masterplan. The City Council fully accepts that not all proposals will require a Concept Masterplan nor would Officers want this happen.</p>

MM2040 55 - Environment Agency

<p>Name</p>	<p>Environment Agency</p>
<p>Representor Number</p>	<p>MM2040 55</p>
<p>Representation Number</p>	<p>MM2040 55-2</p>
<p>Full Representation</p>	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	<p>Support welcomed.</p>

MM19 (Policy D6)

MM2040 20 - Cllr David Tozer

Name	Cllr David Tozer
Representor Number	MM2040 20
Representation Number	MM2040 20-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Comment removed and now put in MM18 - apologies!</p>
Officer Response	No action needed.

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-4
Representation Summary	Support MM19.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p>

	<p>The proposed amendment to Policy D6 will enable a more balanced approach between brownfield and greenfield development.</p> <p><i>Proposed change:</i></p> <p>None required.</p>
Officer Response	<p>Noted.</p>

MM23 (Policy T1)

MM2040 1 - Mr Robert Watters

Name	Mr Robert Watters
Representor Number	MM2040 1
Representation Number	MM2040 1-2
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM23 T1 ii, v, vii. The closure of Andover Road is a complete contradiction to this as it is not safe to route a major arterial road through a housing estate (unprecedented), and it will simply add to congestion and impact adversely on residents, so therefore, this cannot be acceptable in your local plan. WCC have a duty of care to residents, and that decision should have been stopped before it got to the current TROs that have been put out for consultation. WCC need to get this resolved along with CALA and HCC, as it's sheer lunacy to close a perfectly good major road (which in places is dual carriageway), and reroute it through a 2000 house development which clearly will not be either safe or efficient. Therefore, as part of the local plan, these modifications need to be remodified to state that this will NOT be safe or efficient, will NOT reduce congestion (it will add to it), and will not support greener forms of transport. It also goes against avoidance of health risks, and considering most of the housing facing Winchester Avenue is social and affordable housing, goes against the inequalities act as it will adversely affect those residents on lower incomes who cannot afford to purchase property.</p>
Officer Response	<p>Disagree.</p> <p>The representation is not related to any Main Modification. The Strategic Transport Assessment (ST15) https://www.localplan.winchester.gov.uk/assets/inline/1052/ST15-Winchester-Local-Plan-2020-2040-Strategic-Transport-Assessment-August-2024.pdf which has supported the Local Plan, has modelled the impact of the closure of Andover Road.</p>

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-15
Representation Summary	Supportive of the policy's ambition but critical of its practicality and clarity. Technical jargon such as "active and e-mobility travel and car clubs" is highlighted as problematic, with insufficient explanation provided in the supporting documentation.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The broad ambition of this policy is supported overall; whilst greater clarity has been provided in the amended policy as to what scale of development it would be applicable to, the policy requirements are unlikely to be achievable for all types / scales of development to which the policy applies.</p> <p>The policy continues to contain jargon including “active and e-mobility travel and car clubs” which isn’t clearly explained in the accompanying supporting text.</p>
Officer Response	<p>Support for the ambition of the policy is noted.</p> <p>This comment is not related to a proposed modification in Policy T1.</p> <p>Disagree with the first statement in the representation which states that further clarity is needed in this Strategic Policy, the policies in the Sustainable Transport and Active Travel chapter of the Plan provide clear detail and flexibility when it comes to the scale and location of development and it is clear throughout that a case by case approach is applicable to a number of policy applications.</p> <p>The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. Policy T1 aligns with the NPPF, which emphasises prioritising sustainable transport, reducing reliance on private vehicles, and encouraging active travel. The policy references key principles from the Hampshire Movement and Place Framework and the Healthy Streets approach in LTP4. There are no objections from HPT and ATE to the wording of this policy.</p> <p>The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. Policy T1 establishes a clear framework for assessing development proposals that are likely to increase travel demand to ensure that sustainable and active transport modes are prioritised. The requirement for transport assessments</p>

	<p>to quantify travel demand and prioritise sustainable travel choices is in accordance with paragraph 117 of the NPPF, which sets out that all developments generating significant amounts of movement should be required to provide a travel plan and be supported by a transport assessment or statement.</p> <p>Disagree also with the second point. Active and e-mobility are clearly defined in the Plan's Glossary. As set out below.</p> <p>E-mobility: Electromobility – also known as e-mobility - is the principle of using electric propulsion for a wide range of transportation types. E-mobility allows us to move away from CO2 -emitting fossil fuels towards energy supplied from electrical power sources which are, in turn, charged through the electricity grid. By decarbonising the transport sector, electromobility will create a cleaner, healthier and more affordable future for everyone.</p> <p>Active travel: Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.</p>
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MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-8
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bargate homes welcome the inclusion of additional wording which is supportive of prioritising 20-minute neighbourhoods and sustainable forms of transport, specifically within proximity distance to the rail network.</p> <p>The opportunity at Salters Lane is considered to closely aligned with the principles set out in Policy T1. The site is well placed to form part of the 20 minute neighbourhood model, benefitting from good public transport accessibility with bus services to the centre of Winchester within a short walking distance on Stockbridge Road and Winchester Train Station.</p> <p>No amendments are suggested to the policy.</p>
Officer Response	Support is noted for the modification to the policy.

MM2040 42 - Mr Stuart Jones

Name	Mr Stuart Jones
Representor Number	MM2040 42
Representation Number	MM2040 42-1
Representation Summary	<p>This representation has raised the following concerns:</p> <ul style="list-style-type: none"> • Policy T1 Wording Concerns • Decline in Public Transport Infrastructure • NPPF Compliance Issues • Trust and Implementation Concerns
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Summary: The proposed modifications to the Strategic Policy T1 and the related Strategic Transport Assessment are not sufficient to deliver a legally compliant or sound plan.</p> <p>Required change: Policy T1 to be amended - omit 'that would increase travel'. ALL Developments should assess transport needs. It cannot be assumed or wished away that the current transport base provides an adequate sustainable travel base to support Winchester's Plan objectives such as reducing car use.</p> <p>Reason: T1 puts a focus on developments 'that would increase travel' to be supported by transport assessments. This fails to acknowledge and plan for the huge loss of public transport provision across Winchester District (outside of Winchester City Centre) in the last 10 years, during a period of significant new development. Please see transport statistics below. Therefore many districts, especially the Market Towns, are now much more dependent on cars and are *currently* below sustainable levels of public transport provision. The STA does not propose any mitigations outside of Winchester City. The STA and Policy T1 therefore fail to comply with NPPF 2.11 as they will continue to fail to 'align growth and infrastructure'; also NPPF 9.109c as they have not demonstrated and planned 'understanding and addressing the potential impacts of development on transport'. Evidence - Reduction in public transport provision in Winchester Southern Parishes: Bishop's Waltham, bus calls in Square 53 (2017), now 35 (2025) Bishop's Waltham, bus calls at local rail stations 108 (2017), now 8 (2025) Bishop's Waltham, journey time to Southampton 43 mins (2017), now 86 mins (2025) The current Winchester Local Plan added approx 450 new homes in BW during the same period.</p> <p>Please also refer my Plan comment ANON-AQTS-32Z3-B</p>

	<p>Overall comment: Winchester’s current Local Plan has failed to comply with the requirements of the NPPF to align growth and infrastructure. Unless there is stronger provision in Policy T1 and the STA to ensure that the current gap is identified and addressed for ALL developments, the new Local Plan will start from an unsustainable base and is therefore unsound and not compliant with NPPF. The current Local Plan has produced an outcome for the Winchester Southern Parishes that is completely opposite to the requirements of the NPPF - growth with shrinking infrastructure - why should we trust the next Local Plan to deliver legally compliant or sound outcomes?</p>
Officer Response	<p>This representation does not relate to a main modification to Policy T1.</p> <p>Disagree with the point raised regarding the omission of the phrase “<i>that would increase travel</i>” from the policy. Removing this wording would not align with the NPPF and would reduce the flexibility needed in applying the policy appropriately across different types of development proposals.</p> <p>Public transport provision falls outside the remit of the Local Plan. Responsibility for public transport lies with Hampshire County Council as the Local Highways Authority, rather than the Local Planning Authority.</p> <p>We also disagree with the assertion that the Local Plan has failed to meet the requirements of the NPPF. Policy T1 is both clear and unambiguous, setting out specific expectations for development proposals that would give rise to increased travel demand. The policy provides structured and measurable criteria, ensuring applicants and decision-makers understand what is required. Policy T1 is consistent with the NPPF’s emphasis on promoting sustainable transport, reducing reliance on private vehicles, and encouraging active and low-carbon travel.</p>

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>n/a - unable to delete comment.</p>
Officer Response	No comment was left by the respondent.

MM25 (Policy T3)

MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-9
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The clarification on the requirement for active and e-mobility travel and car clubs is welcomed.</p>
Officer Response	Support for the modification is noted.

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-6
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The broad ambition of this policy is supported overall; whilst greater clarity has been provided in the amended policy as to what scale of development it would be applicable to, the policy requirements are unlikely to be achievable for all types / scales of development to which the policy applies.</p>

	<p>The policy continues to contain jargon including “active and e-mobility travel and car clubs” which isn’t clearly explained in the accompanying supporting text.</p>
Officer Response	<p>Support for the ambition of the policy is noted.</p> <p>This comment is not related to a proposed modification in Policy T3.</p> <p>Disagree with the first statement in the representation which states that further clarity is needed in this Strategic Policy, the policies in the Sustainable Transport and Active Travel chapter of the Plan provide clear detail and flexibility when it comes to the scale and location of development and it is clear throughout that a case by case approach is applicable to a number of policy applications.</p> <p>The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. The policy aligns with the NPPF, which emphasises prioritising sustainable transport, reducing reliance on private vehicles, and encouraging active travel. The policy references key principles from the Hampshire Movement and Place Framework and the Healthy Streets approach in LTP4. There are no objections from HPT and ATE to the wording of this policy.</p> <p>The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. The policy establishes a clear framework for assessing development proposals that are likely to increase travel demand to ensure that sustainable and active transport modes are prioritised. The requirement for transport assessments to quantify travel demand and prioritise sustainable travel choices is in accordance with paragraph 117 of the NPPF, which sets out that all developments generating significant amounts of movement should be required to provide a travel plan and be supported by a transport assessment or statement.</p> <p>Disagree also with the second point. Active and e-mobility are clearly defined in the Plan's Glossary. As set out below.</p> <p>E-mobility: Electromobility – also known as e-mobility - is the principle of using electric propulsion for a wide range of transportation types. E-mobility allows us to move away from CO2 -emitting fossil fuels towards energy supplied from electrical power sources which are, in turn, charged through the electricity grid. By decarbonising the transport sector, electromobility will create a cleaner, healthier and more affordable future for everyone.</p> <p>Active travel: Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.</p>

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43

Representation Number	MM2040 43-14
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>The broad ambition of this policy is supported overall; whilst greater clarity has been provided in the amended policy as to what scale of development it would be applicable to, the policy requirements are unlikely to be achievable for all types/scales of development to which the policy applies.</p> <p>The policy continues to contain jargon, including “active and e-mobility travel and car clubs”, which isn’t clearly explained in the accompanying supporting text.</p> <p>Whilst changes have been made, they do not address the comments we have previously raised.</p> <p><u>Proposed change:</u></p> <p>Please refer to the reasoning above.</p>
Officer Response	<p>Support for the ambition of the policy is noted.</p> <p>This comment is not related to a proposed modification in Policy T3.</p> <p>Disagree with the first statement in the representation which states that further clarity is needed in this Strategic Policy, the policies in the Sustainable Transport and Active Travel chapter of the Plan provide clear detail and flexibility when it comes to the scale and location of development and it is clear throughout that a case by case approach is applicable to a number of policy applications.</p> <p>The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. The policy aligns with the NPPF, which emphasises prioritising sustainable transport, reducing reliance on private vehicles, and encouraging active travel. The policy references key principles from the Hampshire Movement and Place Framework and the Healthy Streets approach in LTP4. There are no objections from HPT and ATE to the wording of this policy.</p> <p>The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. The policy establishes a clear framework for assessing development proposals that are likely to increase travel demand to ensure that sustainable and active transport modes are prioritised. The requirement for transport assessments to quantify travel demand and prioritise sustainable travel choices is in accordance with paragraph 117 of the NPPF, which sets out that all developments generating significant amounts of movement should be required to provide a travel plan and be supported by a transport assessment or statement.</p>

	<p>Disagree also with the second point. Active and e-mobility are clearly defined in the Plan's Glossary. As set out below.</p> <p>E-mobility: Electromobility – also known as e-mobility - is the principle of using electric propulsion for a wide range of transportation types. E-mobility allows us to move away from CO2 -emitting fossil fuels towards energy supplied from electrical power sources which are, in turn, charged through the electricity grid. By decarbonising the transport sector, electromobility will create a cleaner, healthier and more affordable future for everyone.</p> <p>Active travel: Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.</p>
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-8
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The broad ambition of this policy is supported overall; whilst greater clarity has been provided in the amended policy as to what scale of development it would be applicable to, the policy requirements are unlikely to be achievable for all types / scales of development to which the policy applies.</p> <p>The policy continues to contain jargon including “active and e-mobility travel and car clubs” which isn’t clearly explained in the accompanying supporting text.</p>
Officer Response	<p>Support for the ambition of the policy is noted.</p> <p>This comment is not related to a proposed modification in Policy T3.</p> <p>Disagree with the first statement in the representation which states that further clarity is needed in this Strategic Policy, the policies in the Sustainable Transport and Active Travel chapter of the Plan provide clear detail and flexibility when it comes to the scale and location of development and it is clear throughout that a case by case approach is applicable to a number of policy applications.</p>

The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. Policy T3 aligns with the NPPF, which emphasises prioritising sustainable transport, reducing reliance on private vehicles, and encouraging active travel. The policy references key principles from the Hampshire Movement and Place Framework and the Healthy Streets approach in LTP4. There are no objections from HPT and ATE to the wording of this policy.

The policy is clear and unambiguous because it sets out specific expectations for developments that would increase travel demand. The policy provides structured criteria that planning applications must meet, ensuring that decision-makers and applicants understand the requirements. Policy T1 establishes a clear framework for assessing development proposals that are likely to increase travel demand to ensure that sustainable and active transport modes are prioritised. The requirement for transport assessments to quantify travel demand and prioritise sustainable travel choices is in accordance with paragraph 117 of the NPPF, which sets out that all developments generating significant amounts of movement should be required to provide a travel plan and be supported by a transport assessment or statement.

Disagree also with the second point. Active and e-mobility are clearly defined in the Plan's Glossary. As set out below.

E-mobility: Electromobility – also known as e-mobility - is the principle of using electric propulsion for a wide range of transportation types. E-mobility allows us to move away from CO2 -emitting fossil fuels towards energy supplied from electrical power sources which are, in turn, charged through the electricity grid. By decarbonising the transport sector, electromobility will create a cleaner, healthier and more affordable future for everyone.

Active travel: Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.

MM27 (Policy NE1)

MM2040 11 - Hampshire Swifts

Name	Prof Catharine Gale
Representor Number	MM2040 11
Representation Number	MM2040 11-1
Representation Summary	<p>The modification to Policy NE1 paragraph 7.23 is is not sound as it's not consistent with national planning policy NPPG Natural Environment 2025 paragraph 017. To make the modification sound and consistent with national policy, it should state:</p> <p>"New developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022, and the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The modification to Policy NE1 paragraph 7.23 is is not sound as it's not consistent with national planning policy NPPG Natural Environment 2025 paragraph 017. Modification:To make the modification sound and consistent with national policy, please add the text of national planning poicy guidance NPPG Natural Environment 2025 paragraph 017 (https://www.gov.uk/guidance/natural-environment): "New developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022, and the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."</p>
Officer Response	Disagree. Paragraph 7.23 of the Local Plan already refers to swift bricks. It would not be appropriate to include this wording in the supporting text

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-16
Representation Summary	object - to the lack of clarity regarding the term 'Ecological Network' which is not defined in supporting text or the glossary.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim Strategic acknowledge and support the removal of the brownfield prioritisation in guiding the focus of new development, as the proposed amendment will enable a more balanced approach between brownfield and greenfield development.</p> <p>However, we would object to the lack of clarity regarding the term 'Ecological Network' which is not defined in supporting text or the glossary.</p>
Officer Response	Disagree - MM121 to Appendix III Glossary, includes the following definition for Ecological Networks " <i>The Ecological network is a group of habitat patches that species can move easily between maintaining ecological function and conserving biodiversity. Ecological networks can provide a connected collection of refuges for wildlife. The Local Ecological Network has been mapped by HBIC</i> "

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-2
Representation Summary	object - to the lack of clarity regarding the term 'Ecological Network' which is not defined in supporting text or the glossary
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bargate acknowledge and support the removal of the brownfield prioritisation in guiding the focus of new development, as the proposed amendment will enable a more balanced approach between brownfield and greenfield development.</p> <p>However, we would object to the lack of clarity regarding the term 'Ecological Network' which is not defined in supporting text or the glossary.</p>
Officer Response	<p>Disagree - MM121 to Appendix III Glossary includes the following definition for Ecological Networks "<i>The Ecological network is a group of habitat patches that species can move easily between maintaining ecological function and conserving biodiversity. Ecological networks can provide a connected collection of refuges for wildlife. The Local Ecological Network has been mapped by HBIC</i>".</p>

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-15
Representation Summary	object - lack of clarity regarding the term 'Ecological Network', which is not defined in the supporting text or the glossary.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>We acknowledge and support the removal of the brownfield prioritisation in guiding the focus of new development, as the proposed amendment will enable a more balanced approach between brownfield and greenfield development.</p> <p>However, we would object to the lack of clarity regarding the term 'Ecological Network', which is not defined in the supporting text or the glossary.</p> <p><u>Proposed change:</u></p> <p>Please refer to the reasoning above.</p>

Officer Response	Disagree - MM121 to Appendix III glossary includes the following definition for Ecological Networks " <i>The Ecological network is a group of habitat patches that species can move easily between maintaining ecological function and conserving biodiversity. Ecological networks can provide a connected collection of refuges for wildlife. The Local Ecological Network has been mapped by HBIC</i> "
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-5
Representation Summary	object - to the lack of clarity regarding the term 'Ecological Network' which is not defined in supporting text or the glossary
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim Strategic acknowledge and support the removal of the brownfield prioritisation in guiding the focus of new development, as the proposed amendment will enable a more balanced approach between brownfield and greenfield development.</p> <p>However, we would object to the lack of clarity regarding the term 'Ecological Network' which is not defined in supporting text or the glossary.</p>
Officer Response	Disagree - MM121 adds a definition of Ecological Network to the glossary, to read " <i>The Ecological network is a group of habitat patches that species can move easily between maintaining ecological function and conserving biodiversity. Ecological networks can provide a connected collection of refuges for wildlife. The Local Ecological Network has been mapped by HBIC</i> "

MM2040 49 - Swifts Local Network: Swifts & Planning Group

Name	Mr Michael Priaulx
Representor Number	MM2040 49

Representation Number	MM2040 49-1
Representation Summary	Comment that the proposed modification to Policy NE1 paragraph 7.23 is not sound and effective, as it lacks essential detail on numbers, locations and types of swift bricks to be installed, in accordance with Planning Practice Guidance Natural Environment Paragraph: 017 Reference ID: 8-017-20250609
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>With regard to main modification MM27: The proposed modification to Policy NE1 paragraph 7.23 is not sound and effective because it's not consistent with national planning policy NPPG Natural Environment 2025 paragraph 017, and therefore lacks essential detail on numbers, locations and types of swift bricks to be installed. Modification: To make the proposed modification sound, effective and consistent with national policy, please add the key text of national planning policy guidance NPPG Natural Environment 2025 paragraph 017 (https://www.gov.uk/guidance/natural-environment), as follows: <i>"New developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows. Specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022, and the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes."</i></p>
Officer Response	<p>Agree that para 7.23 could include reference to guidance in the PPG, to aid interpretation of this part of the Local Plan. The most effective mechanism is to add this as a footnote with a link to the relevant part of the PPG, so this remains up to date:</p> <p>Additional modification</p> <p>7.23 In order to ensure that the Local Plan accords with the guidance in the NPPF and supports the aims set out in the council's nature emergency declaration the preferred approach is to include an overarching strategic policy that sets out the council's aspirations in respect of promoting the protection and enhancement of biodiversity and all aspects of the natural environment. Measures <u>(insert footnote ref)</u> could include hedgehog highways, swift bricks, bat bricks / boxes and appropriate planting. <u>The emerging Hampshire Local Nature Recovery Strategy includes maps of the most valuable areas for wildlife, opportunities to improve nature in the future and local priorities for nature recovery.</u></p> <p><u>Footnote X Further details and guidance on wildlife friendly features can be viewed at para 17 Natural environment - GOV.UK</u></p>

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-2
Representation Summary	Comment - suggests removing 'and' from criterion ii and adding reference to ecosystems services.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The pre-eminent position of nature in sustaining the life support systems we all depend upon. Plus the benefits that support communities, people and wildlife whci also allows mitigation and adaptation to climate change surely means clarity is required as to what is meant by 'integration' in the new paragraph below. Nature and associated ecosystems must always take primacy in any integration.</p> <p><u>The complex interplay between landscape, the natural environment, historic features and cultural connections means that an integrated approach to their management is recommended.</u></p> <p>ii. Safeguards features of the natural environment and nature conservation interest and makes.. Remove word 'and'</p> <p>After add natural ecosystem services after ...<u>and relevant local priorities for nature recovery in the Hampshire Local Nature Recovery Strategy "plus ecosystem services"</u>;</p> <p>These changes will make the MM changes more sound.</p>
Officer Response	Disagree - the suggestions are not considered necessary to make the local plan sound.

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-3
Representation Summary	We are satisfied with the modifications proposed which relate to our comments.

Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Support noted.

MM28 (Policy NE2)

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-5
Representation Summary	Requests further changes are needed to make the Plan more sound.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Shouldnt para ii be qualified i.e., applicable significant developments only? Would make the Plan more Sound</p>
Officer Response	Disagree - no further changes are required, as the policy covers major development in the countryside and it is not necessary to add further reference to the scale of proposals.

MM29 (Policy NE3)

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-4
Representation Summary	Comment - surprised to see no reference to SDNP with regard to consideration of developments in close proximity to SDNP boundaries.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>I am surprised to see no commentS by SDNP or reference to SDNP careful consideration of developments in close proximity to boundaries with the SDNP.</p>
Officer Response	Noted - this MM refers to the assessment of open space provision, rather than developments in proximity to SDNP.

MM30 (Policy NE4)

MM2040 13 - South Wonston Parish Council

Name	Mrs Ann Peal
Representor Number	MM2040 13
Representation Number	MM2040 13-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Referring to our representation ANON-AQTS-3B55-R, we were very pleased to see the inclusion of disused railway corridors and farmland and features of heritage significance in MM30 7.32 and 7.34 as South Wonston derives much of its unique character from these features. We consider the modification therefore legally compliant and sound.</p>
Officer Response	<p>After reviewing the representation, which was previously attributed to MM31 (NE5), officers have determined that it more appropriately relates to MM30 (NE4) and have therefore moved the comment accordingly</p> <p>support noted.</p>

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-1
Representation Summary	Comment requesting reference to ecosystems services is added to the policy.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>add</p> <p>add "optimal natural ecosystem services focused..."</p> <p><i>'Optimal optimal natural ecosystem services focused'</i> green infrastructure shall be accessible for all with high levels of accessibility in primary areas, and promote health, wellbeing, community and cohesion and active living; encourages public access to and within the natural environment where appropriate;</p> <p>This addition will ensure a more sound approach ensuring the right type of nature is provided in GI for bothe people, communities and nature. Creates better coherence with other NE polcies.</p>
<p>Officer Response</p>	<p>Disagree, it is not considered this suggestion is necessary to clarify application of the policy.</p>

MM31 (Policy NE5)

MM2040 17 - Lucy Howard

Name	Lucy Howard
Representor Number	MM2040 17
Representation Number	MM2040 17-1
Representation Summary	Welcome the strengthening of Policy NE5 through proposed Main Modification MM31.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM31 - Solent Mitigation Partnership The City Council welcomes the strengthening of Policy NE5 through the proposed main modification MM31. This aligns with the approach that the City Council takes in Portsmouth. The two LPAs will continue to work together with the Solent Mitigation Partnership to push a joined-up solution to nitrification in the Solent.</p> <p>Winchester December 2025 Main Mods consultation Redacted.pdf</p>
Officer Response	Agree with support for MM31.

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-13
Representation Summary	Support
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We support the amendments to Criterion iv), which now include the role compensation in compliance with paragraph 186 of the NPPF.</p>
Officer Response	Support noted

MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-6
Representation Summary	Comment - would be helpful if the modification made it clear how the Council will assess the need for a contribution towards strategic mitigation measures, where student accommodation is linked to a boarding school.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It would be helpful if the modification made it clear that the Council how the Council will assess the need for a contribution towards strategic mitigation measures. Where student accommodation is linked to a boarding school, it is unlikely to increase recreation pressure on statutory designated sites given that pupils will predominantly remain on the boarding school site.</p>
Officer Response	Comment noted, however, MM 31 para 7.44 includes reference to <u>Some other types of development (such as care homes, student accommodation) may also need to address recreational disturbance both alone and in-combination.</u> Development will be assessed on a case-by-case basis. Further amendments are therefore not considered necessary.

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-3
Representation Summary	Support
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We support the amendments to Criterion iv), which now include the role compensation in compliance with paragraph 186 of the NPPF.</p>
Officer Response	Support noted.

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-2
Representation Summary	Support
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>We support the amendments to Criterion iv), which now include the role compensation in compliance with paragraph 186 of the NPPF.</p> <p><u>Proposed change:</u></p>

	None required.
Officer Response	Support noted.

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-12
Representation Summary	Support
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We support the amendments to Criterion iv), which now include the role compensation in compliance with paragraph 186 of the NPPF</p>
Officer Response	Support noted.

MM2040 45 - Havant Borough Council

Name	David Hayward
Representor Number	MM2040 45
Representation Number	MM2040 45-1
Representation Summary	Support the strengthening of Policy NE5 through the proposed main modification MM31.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>MM31 - Solent Mitigation Partnership</p> <p>The Borough Council welcomes the strengthening of Policy NE5 through the proposed main modification MM31. This aligns with the approach that the Borough Council takes in Havant. The two LPAs will continue to work together with the Solent Mitigation Partnership to push a joined-up solution to nitrification in the Solent.</p> <p>Havant BC Annex - meeting material and copies of correspondence_Redacted.pdf, Havant BC reps on Winchester District Local Plan Main Mods.pdf</p>
Officer Response	Support noted

MM32 (Policy NE6)

MM2040 13 - South Wonston Parish Council

Name	Mrs Ann Peal
Representor Number	MM2040 13
Representation Number	MM2040 13-3
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The new wording for MM32 7.55 is of crucial importance to the parishes of South Wonston and Sutton Scotney (in particular) where new developments on Local Plan Allocations will put further pressure on a variable water supply and disposal of waste water. Southern Water must complete the current project right up to and including the Harestock Waste Water Treatment site for successful delivery of Brightlands and West Hill Rd North. The new connection at South Wonston on Lower Rd has already required flushing out. This incidentally enters the existing drainage system through Worthy Down which may or may not cope with the additional pressure. The proposed amendment MM32 is timely as well as compliant and sound.</p>
Officer Response	<p>After reviewing the representation, which was previously attributed to MM33 (NE7), officers have determined that it more appropriately relates to MM32 (NE6) and have therefore moved the comment accordingly</p> <p>Support noted.</p>

MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-8
Representation Summary	Comment, the policy still seems weak and 'unsound' and can be strengthened by additional text.

Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>This policy still seems weak and 'unsound'. Can be strengthened by adding.... <i>"Development will need to show they avoid flood risk to people and property and comply with best available techniques to prevent excessive hydraulic load on local water, wastewater, and environmental systems, in both current and future risk areas."</i></p>
Officer Response	Disagree, the proposed modification is in response to comments made by Southern Water, Historic England and the Environment Agency, and the additional wording is not considered necessary.

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-4
Representation Summary	We are satisfied with the modifications proposed which relate to our comments.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Support noted.

MM33 (Policy NE7)

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-7
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>I suggest that there should be an additional sentence relevant to all settlement gaps that states: "Protection of defined settlement gaps should not be considered absolute if the character and constraints of alternative development sites are such that they will have negative local impacts and do not command local support". Reason: settlement gaps may have significant locational and planning advantages that alternatives may not have or are of such nature that they should not be considered suitable.</p>
Officer Response	<p>After reviewing the representation, which was previously attributed to MM34 (NE8), officers have determined that it more appropriately relates to MM33 (NE7) and have therefore moved the comment accordingly.</p> <p>Disagree - the policy is clear on the purpose of the settlement gaps and any development allowed within them. The suggested changes go beyond the scope of the policy.</p>

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-3
Representation Summary	Support

<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim supports the inclusion of the policy wording <i>“Once the development is built out at Welborne any future review of the Local Plan should include a review of this settlement gap.”</i>This allows appropriate development to come forward within this location in the future whilst retaining a sufficient gap to prevent settlement coalescence.</p> <p>No amendments are suggested to the policy.</p>
<p>Officer Response</p>	<p>Support noted</p>

MM2040 28 - Wickham Residents Association

<p>Name</p>	<p>Mr Geoffrey Burton</p>
<p>Representor Number</p>	<p>MM2040 28</p>
<p>Representation Number</p>	<p>MM2040 28-1</p>
<p>Representation Summary</p>	<p>Comment - request additional wording <u>to ensure that it is compliant and that the boundary of the Settlement Gap remains as it is on the approved plan.</u></p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>after once <u>the development is built out at Welborne any future review of the Local Plan should include a review of this Settlement Gap</u> add the following <u>to ensure that it is compliant and that the boundary of the Settlement Gap remains as it is on the approved plan.</u></p> <p>The Policies Map should show the full extent of the Settlement Gap including the two areas of Welborne Open Space and the Settlement Gap should be identical to the map within Winchester City Council's Settlement Gap Review dated July 2024.</p>

Officer Response	Disagree - MM33 provides a commitment to review the settlement gap, as part of a future local plan review and this may result in justified changes.
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MM2040 31 - Bargate Homes and Macra Ltd

Name	Adam Bennett
Representor Number	MM2040 31
Representation Number	MM2040 31-1
Representation Summary	Object - request the extent of the settlement gap with respect to Knowle/Wickham/Welborne is reviewed as part of the MMs, given the extent of the development at Welborne is already established. Request that MM33 be expanded to require that the review of the Knowle/Wickham/Welborne settlement gap occur as part of the next local plan evidence base.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>(1) Main Modification MM33 – Policy NE7 Settlement Gaps At the time of the Local Plan Examination Hearing Sessions, the Council’s evidence base underpinning to decisions made in respect of its ‘settlement gaps’ was discussed in detail. The ‘Settlement Gap Review Topic Paper’ (BNE29) makes clear that the scope of the study comprised the review of just 7 of the 9 settlement gaps within the plan area. The review specifically excluded both the Knowle/Wickham/Welborne and Littleton/Winchester settlement gaps. The Council provided little justification for not having undertaken to review these gaps.</p> <p>With respect to Knowle/Wickham/Welborne, the Council took the view that, with the Welborne Garden Village being in the process of build out, it would be appropriate to maintain the settlement gap in its current format, unaltered, and to review the position at a later date.</p> <p>However, the Welborne development is clearly defined in terms of its extents, which accords with the policy approach as set out within the Fareham Borough Council ‘The Welborne Plan’ (2015). There remains in our view little justification therefore not to review the settlement gap when the extents of the allocation and development are long established and thus well known.</p> <p>The Inspector, within document ED38a has accepted at this stage that it is justified that the Knowle/Wickham/Welborne settlement gap remain as extant and that no supplemental review is currently necessary within the scope of this Local Plan. However, this does not mean that a review is not needed at an appropriate time.</p>

	<p>The Council have proposed as part of MM33 that “once the development at Welborne is built out, any future review of the Local Plan should include a review of the Knowle/Wickham/Welborne settlement gap.”</p> <p>It is our view however that the Council should commit as part of this main modification to the review of this settlement gap at the time of the preparation of the next Local Plan, which the Council will soon be stating preparation of.</p> <p>There is little justification for the settlement gap not being subject to review for two successive local plan cycles, particularly when, as noted above, the extent of the development at Welborne is well understood and the methodology of the Council as set out within the ‘Settlement Gap Review Topic Paper’ (BNE29) relied solely upon desk based assessment with no site visits or on-site physical assessment. It is clear that a desk based analysis having regard for the approved pattern of development at Welborne and the relationship with Knowle and Wickham settlements could readily be undertaken.</p> <p>The role and function of the settlement gaps is to ensure that separate identity of the settlements is preserved and indeed, this is an assessment that can clearly occur in the knowledge of the extent of development both consented and proposed without it physically being completed on the ground. We remain of the view that the Knowle/Wickham/Welborne settlement gap substantially exceeds the area of land reasonably and functionally necessary to maintain the separate identities of the settlements and that there are clear opportunities to explore the future growth of Wickham settlement which would not prejudice the integrity or function of the gap.</p> <p>We ask therefore that Main Modification MM33 be expanded to require that the review of the Knowle/Wickham/Welborne settlement gap occur as part of the next local plan evidence base.</p> <p>Main Modifications Response - KPPC - Bargate Homes and Macra Ltd.pdf</p>
Officer Response	<p>Disagree - MM33 is clear that a future review of the gap will be undertaken as part of a future review of the Local Plan, this will require updating of the evidence base and an assessment of the gap against any defined criteria.</p>

MM2040 38 - Taylor Wimpey Strategic Land

Name	Mr Jeremy Gardiner
Representor Number	MM2040 38
Representation Number	MM2040 38-1

Representation Summary	Object - the additional proposed wording does not improve the clarity of the policy - rather, it introduces an additional requirement to assess the cumulative impact of a proposal to align the policy wording with PfSH guidance. PfSH is a non-statutory body and there is no requirement to be consistent with non-statutory guidance. Request that the wording of this part of Policy NE7 should revert to its previous draft wording.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Objection is raised to the proposed amendment to the second sentence in the first paragraph beneath the list of nine defined settlement gaps. The reason given for the proposed amendment is "To improve clarity and to align the wording of Policy NE7 with the PUSH guidance."</p> <p>The amended sentence reads:</p> <p>"Any development should not either individually or cumulatively with other existing or proposed development compromise the integrity of the gap and should not threaten the generally open and undeveloped nature of the gap and avoid coalescence."</p> <p>The additional wording introduced is "either individually or cumulatively with other existing or proposed development compromise the integrity of the gap and".</p> <p>Gaps have been defined taking into account the existing pattern of development within and between existing settlements. The additional proposed wording does not improve the clarity of the policy - rather, it introduces an additional requirement to assess the cumulative impact of a proposal to align the policy wording with PUSH guidance. PfSH (not PUSH) is a non-statutory body and there is no requirement in NPPF paragraph 36 for local plans to be consistent with non-statutory guidance. We submit that the wording of this part of Policy NE7 should revert to its previous draft wording.</p>
Officer Response	Disagree - the amendments to Policy NE7 do not include any specific reference to PfSH guidance, this is included in the supporting text (para 7.60/7.61) to clarify the need for consistency across the sub-region.

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39

Representation Number	MM2040 39-7
Representation Summary	Support the modification, but request a clearer map of the settlement gap is included in the published plan to ensure that the extent of the settlement gap (including the Welborne Open Space) is clearly demarcated and understood.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>WKPC fully supports the final modification sentence- there should be a review to ensure that the purpose of the settlement gap is fully in accordance with that stated in the Local Plan.</p> <p>WKPC also requests a clearer map of the settlement gap is included in the published plan to ensure that the extent of the settlement gap (including the Welborne Open Space) is clearly demarcated and understood.</p>
Officer Response	Support noted - and request to clarify the polices map is noted, a number of the policies maps are in the process of being updated.

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-7
Representation Summary	Support
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>Blenheim supports the inclusion of the policy wording "<i>Once the development is built out at Welborne any future review of the Local Plan should include a review of this settlement gap.</i>" This allows appropriate development to come forward within this location in the future whilst retaining a sufficient gap to prevent settlement coalescence.</p> <p>No amendments are suggested to the policy.</p>
<p>Officer Response</p>	<p>Support noted</p>

MM34 (Policy NE8)

MM2040 22 - South Downs National Park Authority (SDNPA)

Name	Mr Lewis Ford
Representor Number	MM2040 22
Representation Number	MM2040 22-1
Representation Summary	Support but comment that the second policy paragraph is amended to also include assessments of dark night skies.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The SDNPA supports the modifications as these broadly reflect previous advice. We advise that the second policy paragraph is amended to also include assessments of dark night skies.</p> <p>Supporting Information</p> <p>1. 260113 - SDNPA representation_Redacted.pdf</p>
Officer Response	Comment is noted but it is not considered necessary to add reference to dark night skies in the second para of the policy, as dark night skies are specifically referenced in the first para.

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-11
Representation Summary	Object Proposed MM to Policy NE8 wording does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.

Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The proposed MM to Policy NE8 wording does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p>The wording should therefore be amended to:</p> <p><i>“Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas, taking account of the statutory purposes and duty for National Parks as specified in the National Parks and Access to Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023, and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park”.</i></p>
Officer Response	<p>Disagree the MM is in response to comments made by SDNP.</p>

MM2040 33 - Winchester College

Name	<p>Ms Emma Barnett</p>
Representor Number	<p>MM2040 33</p>
Representation Number	<p>MM2040 33-1</p>
Representation Summary	<p>Comment - the statutory purposes and duty for National Parks does not extend to land outside the boundary and therefore this policy goes beyond what is reasonable and justified.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

	<p>The proposed modification to development within the setting, rather than close proximity is supported.</p> <p>The statutory purposes and duty for National Parks does not extend to land outside the boundary and therefore this policy goes beyond what is reasonable and justified.</p>
Officer Response	<p>Disagree - Section 245 (Protected Landscapes) requires all relevant authorities to 'seek to further' the statutory purposes of Protected Landscapes. Relevant Authorities in this regard covers those organisations preparing Development Plan documents. Whereby, a relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes.</p>

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-14
Representation Summary	Object - the wording does not comply with the NPPF and should be amended to reflect the wording as set out in NPPF paragraph 182
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The proposed MM to Policy NE8 wording does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p>The wording should therefore be amended to:</p> <p><i>"Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas, taking account of the statutory purposes and duty for National Parks as specified in the National Parks and Access to Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023, and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park".</i></p>

Officer Response	Disagree - the MM is in response to comments made by SDNP.
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MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-13
Representation Summary	Object - proposed MM does not comply with NPPF and should be amended to reflect NPPF para 182.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>Proposed MM to Policy NE8 wording does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p><u>Proposed change:</u></p> <p>Policy wording should be amended as follows:</p> <p><i>'Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas, taking account of the statutory purposes and duty for National Parks as specified in the National Parks and Access to Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023, and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park'.</i></p>
Officer Response	Disagree - the MM is in response to comments made by SDNP.

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44

Representation Number	MM2040 44-3
Representation Summary	Object Proposed MM to Policy NE8 wording does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The proposed MM to Policy NE8 wording does not comply with the NPPF and should be amended to reflect the wording within the NPPF, as set out in paragraph 182.</p> <p>The wording should therefore be amended to:</p> <p><i>“Development within the setting of the South Downs National Park will only be permitted where it would be sensitively located and designed to avoid or minimise adverse impacts on the designated areas, taking account of the statutory purposes and duty for National Parks as specified in the National Parks and Access to Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023, and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park”.</i></p>
Officer Response	Disagree the MM is in response to comments made by SDNP.

MM35 (Policy NE10)

MM2040 46 - Mr Owen Neal

Name	Mr Owen Neal
Representor Number	MM2040 46
Representation Number	MM2040 46-2
Representation Summary	Object - the proposed modification will allow for the loss of school playing fields and weakens national planning policy protection (NPPF para 104c) for playing fields.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Sport England does not support the proposed modification which will allow for the loss of school playing field and weakens national planning policy protection for playing fields as well as Sport England's playing fields policy protection. We would ask that the modification is amended to ensure that the community benefits relate to sport and that those benefits to sport are considered greater than the detriment caused by the loss of playing field. This would ensure consistency with national planning policy framework paragraph 104 (c) and our own Sport England's playing fields policy.</p>
Officer Response	Disagree, the proposed modification is simply clarifying the position of Hampshire County Council in its role as Education Authority with regard to the disposal of school playing fields. There are no changes to Policy NE10.

MM37 (Policy NE16)

MM2040 4 - XR Winchester / Save Bushfield Camp

Name	Mr Ben Marsh
Representor Number	MM2040 4
Representation Number	MM2040 4-4
Representation Summary	<p>1. Concerns about Council's Mitigation Schemes</p> <p>The respondent objects to reliance on unproven Council-owned Package Treatment Plant upgrades, citing lack of baseline performance data, absence of in-perpetuity funding mechanisms, and deliverability risks that could undermine the entire plan if these specific schemes fail to produce the forecast credits.</p> <p>2. Opposition to "Overnight" Limitation</p> <p>The insertion of "overnight" in criterion (i) is opposed as creating a loophole that would exempt non-residential developments (like Bushfield Camp) from nutrient neutrality requirements, despite such developments generating significant nutrient loading through wastewater and surface runoff.</p> <p>3. Financial Contributions and Double Counting</p> <p>The respondent argues the wording regarding financial contributions fails to secure "additionality" and risks double counting statutory upgrades as mitigation. They suggest explicit language preventing statutory upgrades from being counted as mitigation credits.</p> <p>4. On-Site Solutions and Environmental Conflicts</p> <p>Concerns are raised about potential conflicts between on-site nutrient mitigation infrastructure and biodiversity protection, specifically regarding Bushfield Camp's designation as a SINC (Site of Importance for Nature Conservation) and its high biodiversity value in the Local Nature Recovery Strategy.</p> <p>5. Support for Local Nature Recovery Network</p> <p>The respondent supports the requirement for nutrient mitigation to contribute positively to the Local Nature Recovery Network.</p> <p>6. Challenge to Council's Justification</p> <p>The respondent rebuts the Council's justification for the modifications, arguing that Natural England's agreement is based on unverified data, that critical baseline evidence is missing, and that the modifications merely clarify rather than resolve fundamental flaws in the plan.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p>

MM37 NE16 – Nutrient Mitigation and the Local Nature Recovery Network

1. Objection to Modification at Paragraph 7.114 (Reference to "Council's Own Mitigation Schemes")

I object to the modification stating that the *"Council have produced a Nutrient Topic Paper which sets out the supply of mitigation, including the Council's own schemes."* This renders the plan Not Justified and Ineffective:

- **Reliance on Unproven Mitigation:** The Council is tethering the deliverability of the Plan to specific Council-owned Package Treatment Plant (PTP) upgrades. However, there is no evidence in the Examination Library proving the baseline performance data for these specific PTPs. Without verified baseline data, the credit supply is hypothetical.
- **In-Perpetuity Funding Risk:** There is no evidence of a legally binding financial mechanism to secure the maintenance and replacement of these PTP assets for the 80-125 year lifetime of the development.
- **Deliverability Concerns:** If these specific schemes fail to deliver the forecast credits (e.g., due to technical constraints), the "supply" referenced collapses. Relying on this unverified supply renders the plan brittle.

2. Objection to Criterion (i) (Insertion of "Overnight")

I object to the insertion of the word "overnight". This renders the policy Not Effective:

- **Unlawful Loophole:** Limiting the policy to "overnight" development creates a loophole for high-density employment allocations like Policy W5 (Bushfield Camp). Large-scale commercial developments generate significant nutrient loading through daily wastewater and surface runoff from hardstanding .
- **Precautionary Principle:** Excluding non-residential development from nutrient neutrality contradicts the precautionary principle and risks unmitigated discharges into the River Itchen SAC.

3. Objection to Criterion (ii) (Financial Contributions)

I object to the wording regarding *"financial contributions"* as it fails to secure "additionality":

- **Risk of Double Counting:** The policy must explicitly exclude "statutory upgrades" from being used as mitigation. Using upgrades required by law (e.g., LURA or Environment Act TAL standards) to generate "credits" constitutes "double counting" of the baseline .
- **Remedy:** The text must be amended to add: *"...provided that such mitigation is secured in perpetuity and is demonstrably additional to any statutory baseline requirements."*

4. Objection to On-Site Solutions (Incompatibility with SINC)

I object to the lack of safeguards regarding "developer-provided on-site solutions."

	<ul style="list-style-type: none"> • Conflict with Biodiversity: It is understood the allocation at Bushfield Camp (W5) may rely on an on-site Sewage Treatment Plant (STP). However, the "developable" area is a designated SINC and mapped as "Existing High Biodiversity Value" in the Local Nature Recovery Strategy (LNRS). • Remedy: The policy must state: <i>"On-site nutrient infrastructure will not be permitted where it results in the loss or degradation of designated sites (SINCs) or conflicts with LNRS priorities."</i> <p>5. New Paragraph after 7.115 (Local Nature Recovery Strategy)</p> <p>I support the modification requiring nutrient mitigation to <i>"make a positive contribution towards the Local Nature Recovery Network."</i></p> <p>Observation on Effectiveness regarding Policy W5: For this modification to be effective, it must be strictly applied to Bushfield Camp. The site is mapped in the LNRS with two zones:</p> <ol style="list-style-type: none"> 1. Central Zone (SINC): "Existing High Biodiversity Value." 2. Surrounding Zone: "Potential High Biodiversity Value." <p>Any development or nutrient mitigation intervention (e.g., treatment wetlands or STPs) on the Central Zone would degrade an existing high-value asset. Any intervention on the Surrounding Zone would sever the potential for restoration. Conclusion: By adopting this text, the Plan effectively confirms that Bushfield Camp is an unsuitable location for on-site nutrient mitigation infrastructure, as it would fail the "positive contribution" test.</p> <p>6. Rebuttal of Council's Reasons</p> <p>The Council justifies these changes based on <i>"Agreement with Natural England"</i> and <i>"Recommendations in the HRA."</i> This justification is insufficient to demonstrate soundness:</p> <ul style="list-style-type: none"> • Hollow Agreement: Natural England's endorsement of the nutrient strategy relies entirely on the assumption that the Council's underlying data (specifically the baseline performance of PTPs) is accurate. As established in the Air Quality matter (where NE admitted they did not scrutinize input data), NE does not audit the technical baseline data. • Missing Evidence: Since the baseline data for the PTPs is absent from the Examination Library, Natural England's "agreement" is based on unverified assertions. The Council cannot use NE's high-level support to mask a lack of technical evidence. • False Clarity: The Council claims the changes provide "clarity." However, "clarifying" that the policy relies on a hypothetical supply (the Topic Paper) and exempts commercial polluters (the "Overnight" loophole) does not make the plan sound; it merely clarifies that the plan is legally non-compliant.
<p>Officer Response</p>	<ol style="list-style-type: none"> 1. disagree - the objection refers to the modification stating that the <i>"Council have produced a Nutrient Topic Paper which sets out the supply of mitigation, including the Council's own schemes."</i> This renders the plan Not Justified and Ineffective. This is not part of MM37 and changes to para 7.114. The City Council's Nutrients Topic Paper (including the nutrients mitigation schemes that are relied on in the Topic Paper) and the wording of the Local Plan have all been agreed by Natural England who are the statutory agency.

	<p>2. disagree - the objection refers to the insertion of the word "overnight". This renders the policy Not Effective. Nutrient neutrality in this regard relates to the provision of overnight residential/student accommodation, as required by Natural England advice. Natural England have not raised an objection to the inclusion of this word.</p> <p>3. disagree - the objection refers to the wording regarding "<i>financial contributions</i>" as it fails to secure "additionality": This MM reflects the guidance from Natural England and enables a degree of flexibility with regard to the provision of mitigation measures. Natural England have not raised an objection to the inclusion of these words.</p> <p>4. disagree - the objection refers to the lack of safeguards regarding "developer-provided on-site solutions in respect of the designated SINC at Bushfield Camp. This MM reflects the guidance from Natural England and enables a degree of flexibility with regard to the provision of mitigation measures. Natural England have not raised an issue with this wording.</p> <p>5. Support noted with regard to comments on additional para after 7.115.</p> <p>6. Disagree with the comment that the changes are based on "<i>Agreement with Natural England</i>" and "<i>Recommendations in the HRA.</i>" This justification is insufficient to demonstrate soundness. The MMs have been subject to IIA/HRA. Natural England, who are the statutory agency, have confirmed in writing that they have withdrawn their objection to the Local Plan. There is an updated Statement of Common Ground with Natural England which is available on the Local Plan examination website (ED19).</p>
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MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-6
Representation Summary	Object - The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off-site within land controlled by an applicant and secured through s106 agreement.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off-site within land controlled by an applicant and secured through s106 agreement.</p>

	<p>This is a commonly used approach, summarized by The Planning Portal(https://www.planningportal.co.uk/planning/sustainability-and-planning/nutrient-neutrality/mitigation-techniques) which confirms, “Currently offsite mitigation is limited due to the speed of the implementation of nutrient neutrality regulations.</p> <p><i>Developers can create new wetland activity, areas of rewilding or creating buffer zones along rivers. If it is not possible to achieve neutrality using these techniques, then nutrient credits may be required. Natural England have set up a nutrient mitigation scheme, allowing developers to purchase nutrient credits to offset their nutrient pollution. These can also be purchased privately or through local planning authorities where available. Offsite mitigation is generally required for brownfield sites as onsite mitigation is often not feasible for these developments. It is expected that mitigation measures will remain in place in perpetuity. They may be held in place through the use of Section 106 planning obligations.”</i></p> <p>Further, the position may well be superseded by legislation in due course.</p> <p>For reasons of soundness, to make the policy justified and effective, the following amendments are sought:</p> <p><i>‘...Permission will be granted only where effects can either be excluded or, if that is not possible, mitigation by nutrient neutrality is achieved following the guidance provided by Natural England, <u>and until alternative mitigation is in place through legislation, either through:</u></i></p> <ul style="list-style-type: none"> <i>• A developer-provided on site solution agreed with Natural England; and/or</i> <i>• A developer provided off-site solution agreed with Natural England; and/or</i> <i>• A financial contribution towards a strategic mitigation scheme...’</i>
<p>Officer Response</p>	<p>Disagree - the amendment has been made in light of comments received and amendments agreed with Natural England.</p>

MM2040 33 - Winchester College

<p>Name</p>	<p>Ms Emma Barnett</p>
<p>Representor Number</p>	<p>MM2040 33</p>
<p>Representation Number</p>	<p>MM2040 33-8</p>
<p>Representation Summary</p>	<p>Comment the proposed addition of paragraph 7.115 does not acknowledge that alternative on site mitigation strategies can be employed to achieve nutrient neutrality. New paragraph 7.115 should refer to the Local Nature Recovery Strategy for Hampshire as a guide for the location and design of nutrient mitigation schemes where <u>necessary or appropriate.</u></p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Comment</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The proposed addition of paragraph 7.115 does not acknowledge that alternative on site mitigation strategies can be employed to achieve nutrient neutrality and seems to run counter to the proposed modification to criterion ii of Policy NE16 which allows for a developer-provided on site solution agreed with Natural England which is supported. The new paragraph 7.115 should therefore refer to the Local Nature Recovery Strategy for Hampshire as a guide for the location and design of nutrient mitigation schemes where <u>necessary or appropriate.</u></p>
Officer Response	Disagree, changes under MM37 simply clarify that nutrient mitigation schemes should be agreed with Natural England and that the Hampshire LNRS could be used to guide the location and design of mitigations schemes.

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-13
Representation Summary	Object - The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off-site within land controlled by an applicant and secured through s106 agreement.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off-site within land controlled by an applicant and secured through s106 agreement.</p>

	<p>This is a commonly used approach, summarized by The Planning Portal (https://www.planningportal.co.uk/planning/sustainability-and-planning/nutrient-neutrality/mitigation-techniques) which confirms, “Currently offsite mitigation is limited due to the speed of the implementation of nutrient neutrality regulations.</p> <p><i>Developers can create new wetland activity, areas of rewilding or creating buffer zones along rivers. If it is not possible to achieve neutrality using these techniques, then nutrient credits may be required. Natural England have set up a nutrient mitigation scheme, allowing developers to purchase nutrient credits to offset their nutrient pollution. These can also be purchased privately or through local planning authorities where available. Offsite mitigation is generally required for brownfield sites as onsite mitigation is often not feasible for these developments. It is expected that mitigation measures will remain in place in perpetuity. They may be held in place through the use of Section 106 planning obligations.”</i></p> <p>Further, the position may well be superseded by legislation in due course. For reasons of soundness, to make the policy justified and effective, the following amendments are sought:</p> <p><i>‘...Permission will be granted only where effects can either be excluded or, if that is not possible, mitigation by nutrient neutrality is achieved following the guidance provided by Natural England, and until alternative mitigation is in place through legislation, either through:</i></p> <ul style="list-style-type: none"> <i>• A developer-provided on site solution agreed with Natural England; and/or</i> <i>• <u>A developer provided off-site solution agreed with Natural England; and/or</u></i> <i>• A financial contribution towards a strategic mitigation scheme...’</i>
Officer Response	Disagree - the MM presents the agreed approach with Natural England.

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-11
Representation Summary	Object - The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off-site within land controlled by an applicant and secured through s106 agreement.
Full Representation	In terms of this Main Modification do you? * Object

Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.

Reasoning:

Regulation 19 policy introduced a specific requirement for making positive contributions to the Local Nature Recovery Network within criterion iii of Policy NE16. However, the new paragraph of supporting text at 7.115, while an improvement, still lacks sufficient explanation of what is required. Further clarification is needed to guide the development of such schemes.

Furthermore, proposed additional supporting text modifications fail to mention the LURA, which will supersede the requirement for individual schemes to demonstrate nutrient neutrality.

The amended policy position is also too restrictive, in limiting acceptable mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to be confined within the red-line boundary of a planning application. In practice, mitigation could be delivered off-site on land within the applicant's control, or on third-party land through the purchase of nutrient credits secured through a Section 106 agreement. This is an established and applied approach as summarised by the Planning Portal (<https://www.planningportal.co.uk/planning/sustainability-and-planning/nutrient-neutrality/mitigation-techniques>), which confirms, "*Currently offsite mitigation is limited due to the speed of the implementation of nutrient neutrality regulations. Developers can create new wetland activity, areas of rewilding or creating buffer zones along rivers. If it is not possible to achieve neutrality using these techniques, then nutrient credits may be required. Natural England have set up a nutrient mitigation scheme, allowing developers to purchase nutrient credits to offset their nutrient pollution. These can also be purchased privately or through local planning authorities where available. Offsite mitigation is generally required for brownfield sites as onsite mitigation is often not feasible for these developments. It is expected that mitigation measures will remain in place in perpetuity. They may be held in place through the use of Section 106 planning obligations.*"

Proposed change:

Amend the supporting text to provide clearer guidance on what is required to make positive contributions to the Local Nature Recovery Network under criterion iii). This should include specific examples or mechanisms to guide the development of such schemes. Additionally, the supporting text should also mention the LURA, which will supersede the requirement for individual schemes to demonstrate nutrient neutrality.

For reasons of soundness and to ensure the policy is justified and effective, the following amendments are required:

*'...Permission will be granted only where effects can either be excluded or, if that is not possible, mitigation by nutrient neutrality is achieved following the guidance provided by Natural England, **and until alternative mitigation is in place through legislation**, either through:*

- *A developer-provided on site solution agreed with Natural England; and/or*

	<ul style="list-style-type: none"> • <i>A developer provided off-site solution agreed with Natural England; and/or</i> • <i>A financial contribution towards a strategic mitigation scheme...'</i>
Officer Response	Disagree - the amendment has been made in light of comments received and amendments agreed with Natural England.

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-11
Representation Summary	Object - The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off-site within land controlled by an applicant and secured through s106 agreement.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The amended policy position is too restrictive, in that it restricts mitigation to on-site solutions or contributions to strategic mitigation schemes. Such mitigation does not need to fall within the red-line of a planning application and could be delivered off- site within land controlled by an applicant and secured through s106 agreement.</p> <p>This is a commonly used approach, summarized by The Planning Portal (https://www.planningportal.co.uk/planning/sustainability-and-planning/nutrient-neutrality/mitigation-techniques) which confirms, <i>“Currently offsite mitigation is limited due to the speed of the implementation of nutrient neutrality regulations. Developers can create new wetland activity, areas of rewilding or creating buffer zones along rivers. If it is not possible to achieve neutrality using these techniques, then nutrient credits may be required. Natural England have set up a nutrient mitigation scheme, allowing developers to purchase nutrient credits to offset their nutrient pollution. These can also be purchased privately or through local planning authorities where available. Offsite mitigation is generally required for brownfield sites as onsite mitigation is often not feasible for these developments. It is expected that mitigation measures will remain in place in perpetuity. They may be held in place through the use of Section 106 planning obligations.”</i></p>

	<p>Further, the position may well be superseded by legislation in due course.</p> <p>For reasons of soundness, to make the policy justified and effective, the following amendments are sought:</p> <p><i>'...Permission will be granted only where effects can either be excluded or, if that is not possible, mitigation by nutrient neutrality is achieved following the guidance provided by Natural England, and until alternative mitigation is in place through legislation, either through:</i></p> <ul style="list-style-type: none"> <i>·A developer-provided on site solution agreed with Natural England; and/or</i> <i>·A developer provided off-site solution agreed with Natural England; and/or</i> <i>·A financial contribution towards a strategic mitigation scheme...'</i>
Officer Response	Disagree - the amendment has been made in light of comments received and amendments agreed with Natural England.

MM38 (Policy NE17)

MM2040 30 - Natural England

Name	Rachael Clemson
Representor Number	MM2040 30
Representation Number	MM2040 30-1
Representation Summary	Welcome reference to the creation of buffer zones, but request further details with regard to the Solent Wader and Brent Goose Strategy core areas, in that all sites identified within the Strategy mapping will require a project level HRA regardless of classification level.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM38: Policy NE17 Rivers, watercourses, and their settings We welcome the recommendation for creation of natural buffer zones of a minimum of 10m between built development and watercourses. This is particularly relevant to allocation policies with onsite watercourses connected to the River Itchen SAC such as policy W2 Sir John Moore Barracks. Buffer zone habitats should be designed to support and enhance the natural function of the watercourse.</p> <p>In addition the paragraph referring to the Solent Wader and Brent Goose Strategy in this modification has missed Core Areas from the list of site classifications, all sites identified within the Strategy mapping will require a project level HRA regardless of classification level.</p> <p>534477 NE response to WCC Local Plan Main Modifications (002).pdf</p>
Officer Response	<p>The Council acknowledges that para 7.118, lacks context with regard to the Solent Wader and Brent Goose Strategy, in that it covers a much broader area than just Winchester District. To clarify its coverage and purposes para 7.118 is to be amended as follows:</p> <p>Move para 7.118 to after 7.120 (paras 7.117, 7.119 and 7.120 focus on ground water and water courses) consequential renumbering of paragraphs.</p> <p><u>7.118 The Solent Wader and Brent Goose Strategy (SWBGS) relates to internationally important brent goose and wading bird populations within and around the Special Protection Areas and Ramsar wetlands of the Solent Coast (Hampshire, Isle of Wight and West Sussex).</u> A small number of Solent Wader and Brent Goose Strategy (SWBGS) sites (“functionally linked land”) are identified <u>in the Winchester District</u> around the Upper Hamble as supporting high tide roosts of birds from the Solent and Southampton SPA/Ramsar. SWBGThe Solent Wader and Brent Goose mapping is available on Solent Waders & Brent Goose Strategy – coastal bird conservation, waders and brent geese</p>

	data and mapping solentwbgs.wordpress.com. <u>There is a minimum requirement of one year’s ecological survey to confirm the classification of a site (three years where classification is disputed).</u>
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MM2040 53 - Mr Danny Lee

Name	Mr Danny Lee
Representor Number	MM2040 53
Representation Number	MM2040 53-3
Representation Summary	Comment - Natural Buffers should be bigger to achieve the right protection levels between rivers and developments, esp. sensitive habitats
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>New para 7. 123 is welcomed.</p> <p>However, it is my understanding that the Natural Buffers should be bigger to achieve the right protection levels between rivers and developments, esp. sensitive habitats.</p> <p>Can para 7.123 be amended accordingly to ensure Soundness.</p> <p>Natural Buffers (minimum 20m / 50-100m for sensitive habitats, e.g. chalk streams) to prevent incidents of polluting run-off and protect biodiversity.</p> <p>I cannot reconcile the widest guidance with what EA suggests and as that above based on my conversations with HIOWWT. This creates unsoundness if not addressed.</p> <p>My analysis supports wider buffers based on supporting sources of information for buffer widths with distances as follows:</p> <ul style="list-style-type: none"> - Minimum 20 metres for general protection of watercourses. - 50 to 100 metres for highly sensitive habitats, notably chalk streams. The ask around 50-100m buffers, is taken from this paper by Natural England - Nature Networks Evidence Handbook - NERR081. 6 March 2020. It is referenced on pg. 28 and pg. 110. While it does not reference chalk streams specifically, it mentions biodiversity sites. <p>Other Definitive References</p>

	<p>1. Chalk Stream Restoration Strategy (2021) Published by Natural England and the Environment Agency, this strategy highlights the need for buffer zones of 50 to 100 metres around chalk streams to safeguard these priority habitats. Read the strategy summary: https://www.gov.uk/government/publications/chalk-stream-restoration-strategy</p> <p>2. Hampshire and Isle of Wight Wildlife Trust – Save Our Chalk Streams Campaign Advocates for the implementation of these buffer widths into local planning policy to protect vulnerable chalk stream ecosystems. Campaign details: https://www.hiwwt.org.uk/blog/hiwwt/save-our-chalk-streams</p> <p>3. Sustainable Farming Incentive (SFI) – Buffer Strip Requirements Provides buffer strip standards for watercourses based on risk assessments: - 6 metres for low to moderate risk areas. - 10 metres for high-risk areas. DEFRA SFI Guidance: https://defrafarming.blog.gov.uk/water-body-buffering-standard-of-the-sustainable-farming-incentive-pilot/ Conclusion</p> <p>While a 20-metre minimum buffer may be appropriate for general scenarios, a 50 to 100-metre buffer is necessary for chalk streams and similar sensitive habitats to effectively prevent pollution and protect biodiversity in line with national strategies and best practice guidance.</p> <p>Para vii should be qualified/reference to buffers distances above</p> <p><u>vii. Creation of adequate natural buffers zones between riverbanks/watercourse banks and any built development. These buffer zones should be kept free of any structures to allow the natural watercourse environment to flourish;</u></p>
Officer Response	Comment noted, however this MM has been prepared in response to comments from Natural England and the Environment Agency, no further changes are considered necessary.

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-5
Representation Summary	We are satisfied with the modifications proposed which relate to our comments.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p>

	EA comments - MM Redacted.pdf
Officer Response	Support noted.

MM40 (Policy HE2)

MM2040 29 - Historic England

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-5
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We welcome the proposed modification but advise that it needs a little further amendment to be clear and support policy implementation. Our suggested revised wording is:</p> <p>"Applications involving buildings and other structures that are included on the council's 'Buildings at Risk Register' will need to include a schedule of works and accompanying supporting information that details all of the repairs that are needed to improve the condition of the building or structure which, subject to the satisfaction of the local planning authority, will enable the removal of them from the register. Proposals affecting assets on the national Heritage at Risk Register shall include works that address the nature of risk to enable progress towards their removal from that register; a scheme of repairs alone may not be sufficient to ensure removal from that Register, which for secular listed buildings also requires sustainable use where possible.</p> <p>Supporting Information</p> <p>1. Historic England - 20260115 Winchester LP mainmods consultation GRHE response Redacted.pdf</p>
Officer Response	<p>Disagree. The wording of Policy HE2 had been previously agreed with Historic England. The modification to policy HE2 is set out below and it is not considered necessary to make this change for the purposes of soundness.</p> <p>The council is of the view that the two sections of text set out the same policy requirements, simply using different wording.</p> <p>The text is already set out in the Schedule of Proposed Main Modifications (MM40): <u>Applications involving buildings and other structures that are included on the council's 'Buildings at Risk Register', or the Historic England 'Heritage At Risk</u></p>

	<p><u>Register', will need to include a schedule of works and accompanying supporting information that details all of the repairs that are needed to improve the condition of the building or structure which, subject to the satisfaction of the local planning authority, will enable the removal of them from the register(s).</u></p>
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MM42 (Policy HE6)

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-14
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim has concerns regarding the additional policy wording requiring development proposals to 'avoid' locating development within 'sensitive' areas. The NPPF takes a more flexible approach. This flexibility recognises that field evaluation can lead to different outcomes, including addressing heritage assets through excavation thereby facilitating development within areas initially identified as 'highly sensitive'. Further, the wording requires clarification to only cover high-sensitivity, as it would be inappropriate to provide such restriction over areas of low-sensitivity.</p> <p>To provide a positive approach, consistent with national policy, the wording should be amended to:</p> <p><i><u>"Proposals should take a positive approach to archaeology, by considering the need to avoid locating development on highly sensitive areas, through appropriate survey and evaluation, and designing development that responds positively to the significance of archaeological features, including their settings."</u></i></p>
Officer Response	<p>Disagree. This wording was introduced into the policy at the MIQs stage of the examination. Historic England specifically requested this amendment to Policy HE6 and set out the justification in their response to the Inspector's Matters, Issues and Questions (see: ANON-AQTS-32U8-B-Historic-England-Matter-15.pdf Their request was made directly in response to the Inspector's question: <i>'When read as a whole, together with its title, would Policy HE6 be clear and unambiguous in setting out how a decision maker should respond to its requirements?'</i></p> <p>In their Regulation 19 response, Historic England raised concerns that the existing wording could imply that minimisation of harm is equivalent to avoidance. They emphasised that for nationally important archaeological assets (whether scheduled or not) policy should clearly prioritise the avoidance of harm, which typically involves preservation in situ.</p>

	Flexibility is achieved in the policy through the following text in the policy: <i>Applications for planning permission which affect, or may affect a scheduled monument, or its setting, should be supported by appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm. Where harm is unavoidable, proposals should explain the reasons why and outline steps to minimise harm.</i>
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MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-7
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bargate has concerns regarding the additional policy wording requiring development proposals to 'avoid' locating development within 'sensitive' areas. The NPPF takes a more flexible approach. This flexibility recognises that field evaluation can lead to different outcomes, including addressing heritage assets through excavation thereby facilitating development within areas initially identified as 'highly sensitive'. Further, the wording requires clarification to only cover high-sensitivity, as it would be inappropriate to provide such restriction over areas of low-sensitivity.</p> <p>To provide a positive approach, consistent with national policy, the wording should be amended to:</p> <p><i><u>"Proposals should take a positive approach to archaeology, by considering the need to avoid locating development on highly sensitive areas, through appropriate survey and evaluation, and designing development that responds positively to the significance of archaeological features, including their settings."</u></i></p>
Officer Response	<p>Disagree. This wording was introduced into the policy at the MIQs stage of the examination. Historic England specifically requested this amendment to Policy HE6 and set out the justification in their response to the Inspector's Matters, Issues and Questions (see: ANON-AQTS-32U8-B-Historic-England-Matter-15.pdf Their request was made directly in response to the Inspector's question: <i>'When read as a whole, together with its title, would Policy HE6 be clear and unambiguous in setting out how a decision maker should respond to its requirements?'</i></p>

	<p>In their Regulation 19 response, Historic England raised concerns that the existing wording could imply that minimisation of harm is equivalent to avoidance. They emphasised that for nationally important archaeological assets (whether scheduled or not) policy should clearly prioritise the avoidance of harm, which typically involves preservation in situ.</p> <p>Flexibility is achieved in the policy through the following text in the policy: <i>Applications for planning permission which affect, or may affect a scheduled monument, or its setting, should be supported by appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm. Where harm is unavoidable, proposals should explain the reasons why and outline steps to minimise harm.</i></p>
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim has concerns regarding the additional policy wording requiring development proposals to 'avoid' locating development within 'sensitive' areas. The NPPF takes a more flexible approach. This flexibility recognises that field evaluation can lead to different outcomes, including addressing heritage assets through excavation thereby facilitating development within areas initially identified as 'highly sensitive'. Further, the wording requires clarification to only cover high-sensitivity, as it would be inappropriate to provide such restriction over areas of low-sensitivity.</p> <p>To provide a positive approach, consistent with national policy, the wording should be amended to:</p> <p><i>“Proposals should take a positive approach to archaeology, by considering the need to avoid locating development on highly sensitive areas, through appropriate survey and evaluation, and designing development that responds positively to the significance of archaeological features, including their settings.”</i></p>
Officer Response	<p>Disagree. This wording was introduced into the policy at the MIQs stage of the examination. Historic England specifically requested this amendment to Policy HE6 and set out the justification in their response to the Inspector's Matters, Issues and Questions (see: ANON-AQTS-32U8-B-Historic-England-Matter-15.pdf Their request was made directly</p>

in response to the Inspector's question: ***'When read as a whole, together with its title, would Policy HE6 be clear and unambiguous in setting out how a decision maker should respond to its requirements?'***

In their Regulation 19 response, Historic England raised concerns that the existing wording could imply that minimisation of harm is equivalent to avoidance. They emphasised that for nationally important archaeological assets (whether scheduled or not) policy should clearly prioritise the avoidance of harm, which typically involves preservation in situ.

Flexibility is achieved in the policy through the following text in the policy: *Applications for planning permission which affect, or may affect a scheduled monument, or its setting, should be supported by appropriate and proportionate evidence on the significance of the asset (including the contribution to significance made by its setting) and the steps that would be taken to avoid and minimise harm. Where harm is unavoidable, proposals should explain the reasons why and outline steps to minimise harm.*

MM49 (Policy H1)

MM2040 6 - Mr Tom Hutchinson

Name	Mr Tom Hutchinson
Representor Number	MM2040 6
Representation Number	MM2040 6-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The proposed change to the plan period and the consequential reduction in the district's housing requirement from 13,565 to 10,816 dwellings, renders the Plan unsound and potentially unlawful due to a failure to meet the Duty to Cooperate (DtC). The Main Modification does not reflect a strategy that is positively prepared, justified, or effective, and is inconsistent with national policy as set out in paragraphs 11b, 35, and 60–61 of the NPPF.</p> <p>The Inspector appears to have accepted the principle of updating the plan base year for reasons of plan horizon and standard method alignment. However, the implications of this change – particularly in terms of unmet housing need and cross-boundary distribution – do not appear to have been properly examined in the round, and they create a material risk of legal challenge.</p> <p>1. Duty to Cooperate Failure</p> <p>The previous housing requirement of 13,565 dwellings included a 1,900-dwelling allowance to contribute to unmet need arising from Portsmouth and Havant. That provision was agreed through signed Statements of Common Ground (SD08e and SD08i) and reflected extensive engagement with the Partnership for South Hampshire (PfSH). The new housing requirement under MM49 results in a surplus of only 495 dwellings over Winchester's own local need. The apportionment to Portsmouth and Havant has correspondingly fallen to just 150 and 345 dwellings respectively – a reduction of over 75%.</p> <p>This revised position was not subject to renewed agreement with either authority. There is no updated Statement of Common Ground on this point, nor has the Council published evidence of any sustained engagement on the implications of this reduction (as required by NPPF para 27 and Planning Practice Guidance). The outcome of previous cooperation – namely the 1,900-home contribution – has been unilaterally revised through the examination process without securing the</p>

continued support of the authorities most affected. This is not consistent with the principles of ongoing and active cooperation required by the NPPF or the legal duty under s33A of the Planning and Compulsory Purchase Act 2004.

The DtC was passed at submission based on the now-superseded housing distribution. Given the significance of the change to the agreed cross-boundary strategy, the Council was obliged to re-engage and reconfirm support for the revised position. There is no evidence that it did so. That omission alone creates a serious risk that the Plan fails the DtC, a legal requirement that cannot be cured post-adoption.

2. Strategic Undermining of Neighbouring Authorities

Portsmouth and Havant are unable to meet their housing needs in full. Their requests to Winchester for assistance, and the resultant 1,900-dwelling uplift, were the outcome of a carefully brokered agreement through PfSH and SoCGs. The new Main Modification directly compromises the soundness and deliverability of their emerging Local Plans by re-opening an unresolved shortfall of over 1,400 dwellings. This outcome is not a technical adjustment – it fundamentally alters the spatial strategy for the wider housing market area.

Portsmouth has already paused its Local Plan, in part due to unresolved questions of housing supply. Havant's plan was withdrawn following Inspectors' findings that it could not meet its needs sustainably. Winchester's contribution of 1,900 homes was central to both authorities' forward planning assumptions. The sudden reduction to 495 dwellings, based solely on a shift in arithmetic rather than capacity or sustainability evidence, fails the requirement for strategic, effective planning. It leaves those unmet needs unresolved and in doing so, causes potential harm to neighbouring plan processes.

3. Soundness Tests Are Not Met

The Plan is no longer positively prepared as it fails to contribute meaningfully to unmet needs that it previously acknowledged as capable of being addressed. The Council's land supply is unchanged since Regulation 19, yet it now plans to contribute less to its neighbours, despite unchanged evidence of regional need.

It is not justified, as the change in requirement results not from new evidence of capacity or constraint, but simply from counting fewer years. No evidence has been published to demonstrate that the 1,900-home provision is now undeliverable or unsustainable.

It is not effective, as it introduces strategic uncertainty for neighbouring authorities, makes the PfSH-wide strategy harder to deliver, and risks undermining wider plan-making processes.

It is not consistent with national policy, particularly paragraphs 11b and 61, which require needs to be met as far as is reasonable to do so, including needs from neighbouring areas. Winchester has demonstrated that it can meet its own need and contribute to others. The only change is a shift in the plan base date – that should not absolve the Council of responsibilities under the NPPF.

4. Strategic Distribution Disproportionately Impacts Rural Areas

The overall housing requirement reduction of 18% (13,565 to 10,816 dwellings) has led to a 30% reduction in the Market Towns and Rural Area (MTRA) total (3,825 to 2,675 dwellings) and a 44% reduction for Larger Rural Settlements (1,570 to

	<p>880). This disproportionate adjustment is not explained or justified in any of the Council’s evidence. It suggests an arbitrary rebalancing in favour of larger settlements, inconsistent with the original spatial strategy, and it undermines the role of places like Denmead which were previously earmarked for sustainable levels of growth.</p> <p>Requested changes:</p> <p>Given that the Inspector has proposed changes that effectively dismantle the underpinning of the Plan’s housing strategy – and given that there is no headroom in the current housing supply to revert to the original plan period – the Plan as modified is not legally or procedurally sound. The only appropriate course of action is:</p> <ol style="list-style-type: none"> 1. That the Local Plan is withdrawn; and 2. That the Council begins immediate preparation of a new Local Plan, informed by the current standard method but incorporating a robust strategy for unmet need and supported by updated cooperation with neighbouring authorities. <p>Alternatively, if the Inspector is not minded to recommend withdrawal, the following changes are proposed:</p> <ul style="list-style-type: none"> · Reinstatement of a housing requirement of not less than 13,565 dwellings, including a 1,900-home contribution to unmet needs, with supporting text explaining that the early delivery of these homes in 2020–2024 contributes to the delivery trajectory but does not warrant a reduction in requirement. · Publication of updated Statements of Common Ground with Havant and Portsmouth confirming agreement to any revised housing contributions. · A reappraisal of the spatial distribution strategy to ensure a proportionate and evidence-led apportionment of housing between urban and rural areas.
<p>Officer Response</p>	<p>Do not agree that further revisions are necessary to this modification.</p> <p>Responses to each of the four points are set out below.</p> <ol style="list-style-type: none"> 1. Duty to Cooperate Failure <p>The Council does not consider it was necessary to revised and republish statements of common ground with neighbouring authorities prior to the Main Modifications consultation. The Statements of common Ground with Portsmouth City Council and Havant Borough Council both recognise that the overall level of housing available for unmet needs may change, and sets out a proportion of unmet need to be made available for each authority, to provide the necessary flexibility through the Examination process.</p> <ol style="list-style-type: none"> 2. Strategic Undermining of Neighbouring Authorities <p>It is not accepted that the Modification compromises the ability of Havant Borough Council or Portsmouth City Council to progress their Plans. Cross boundary discussions are ongoing. The Main Modifications consultation provides Portsmouth City Council, Havant Borough Councils and other neighbouring authorities the opportunity to respond and update the examination on their position with regards to unmet housing need and the Local Plan, as well as ongoing correspondence regarding cross-boundary planning matters</p> <ul style="list-style-type: none"> · <ol style="list-style-type: none"> 3. Soundness Tests Are Not Met

	<p>The overall level of housing development proposed in the Plan has been considered throughout the Examination, including the Housing Topic Paper (ED10g) and Update (ED02) and the Hearings for Matters 2 and 4. This modification does not reduce the amount of ew housing anticipated to come forward.</p> <p>4. Strategic Distribution Disproportionately Impacts Areas</p> <p>The changes in this modification arise from aligning the Plan's housing requirement with the latest calculation of Local Housing Need (2024) and other updates set out in Winchester Local Plan Examination Housing Numbers and Sites Update (ED42a).</p> <p>No further revision to the spatial distribution is proposed. The rationale for the strategic distribution is set out in the Development Strategy and Site Selection Background Paper (SD10b).</p> <p>As a point of detail, MM51 moves the 200 homes anticipated from allocation Ravenswood (KN1) from "Larger Rural Settlements" to "Remaining Rural Area" to correctly recognise that the site is adjacent to Knowle, not Wickham. This accounts for 13% of the 44% reduction highlighted by the respondent but again, is not a result of a change in the development strategy.</p>
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MM2040 17 - Lucy Howard

Name	Lucy Howard
Representor Number	MM2040 17
Representation Number	MM2040 17-2
Representation Summary	<p>PCC acknowledges that the apportionment of unmet needs allowance was agreed based upon the figure of 1,900 dwellings whilst cognisant of the fact that it could change in the course of the examination.</p> <p>Portsmouth City Council currently has an unmet Housing need of 3,916 dwellings between 2025 and 2040. It is broadly positive therefore, that the Winchester District Local Plan makes provision for accommodating a proportion of both Havant Borough and Portsmouth City's unmet housing need.</p> <p>The City Council has been working with its neighbours in South East Hampshire, namely Portsmouth, Gosport and Havant Borough Councils, to identify the level of unmet housing and employment need. Appendices 1-4 of this response set out correspondence and supporting materials relating to the level of unmet need for housing and employment land.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Policy H1 of the Submission Winchester Local Plan (Regulation 19) included an unmet needs allowance of 1,900 dwellings as a contribution towards the unmet needs of neighboring areas in</p>

	<p>South Hampshire. This has been reduced to 495 dwellings through the examination process to date. The two City Councils agreed in the Statement of Common Ground (SoCG) of October 2024 (in partnership with Havant Borough Council) a distribution of any unmet needs allowance from Winchester District as follows:</p> <ul style="list-style-type: none"> • 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan to Portsmouth City Council • 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan to Havant Borough Council: <p>This apportionment was agreed based upon the 1,900 figures from the submitted local Plan whilst cognisant of the fact that it could change in the course of the examination. Portsmouth City Council currently has an unmet Housing need of 3,916 dwellings between 2025 and 2040.</p> <p>Policy H1 as has been revised through the proposed main modification MM49 resulting in a reduction in the unmet need allowance to 495 homes, equating to approximately 150 homes for Portsmouth City Council and 345 homes for Havant Borough Council. It is broadly positive therefore, that the Winchester District Local Plan makes provision for accommodating a proportion of both Havant Borough and Portsmouth City’s unmet housing need.</p> <p>Whilst this contribution by no means accommodates the full unmet need, it is a positive step in addressing it. The full extent of unmet housing need in Portsmouth, Gosport and Havant is set out below.</p> <p>These updated figures are also referenced in the proposed main modifications MM6 and MM50. The City Council notes therefore the reduction in the unmet need allowance being provided to the City Council and Havant Borough to 495 homes as referenced in these policies. The City Council has been working with its neighbors in South East Hampshire, namely Gosport and Havant Borough Councils, to identify the level of unmet housing and employment need. This was set out by the authorities in a letter (forming appendix 1 of this letter) to Winchester City Council in October 2025 concluding that the authorities had a housing shortfall of 18,347 dwellings in total. Winchester City Council acknowledged the letter in November 2025 (appendix 2). The South East Hampshire Authorities met with WCC (as well as East Hampshire District Council and Fareham Borough Council) in October 20205 to present their land supply position (a note of this meeting forms appendix 3). Finally, a joint letter to Winchester forms appendix 4 of this letter.</p> <p>Winchester December 2025 Main Mods consultation Redacted.pdf</p>
<p>Officer Response</p>	<p>The comments are noted. No change to the Modification have been sought by PCC and none is considered necessary.</p> <p>WCC is engaged in ongoing correspondence with Portsmouth, Havant, Gosport councils and more recently with the South Downs National Park regarding unmet needs in South East Hampshire which will inform the next Local Plan.</p>

MM2040 19 - Mandy Owen

Name	Mandy Owen
Representor Number	MM2040 19
Representation Number	MM2040 19-2
Representation Summary	<p>Support change in date for assessing housing needs.</p> <p>Consider the Plan end date should be revised to establish a minimum 15 year period post adoption.</p> <p>Considers the plan does not respond sufficiently to unmet needs, and the reduction in allowance through the Plan process calls into question whether the true unmet need will ever be met.</p> <p>Concern that the anticipated 350 homes in South downs National Park is too high, and that the Plan does not make provision for unmet need in the National Park.</p> <p>Considers approach to housing need is a further and very clear justification for the importance of the wording/requirement being set by Policy CN1 being sufficiently forceful.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM49 (Policy H1)</p> <p>2.7 This MM refers to the change in base date from 2020 to 2024 and subsequent change in housing requirement.</p> <p>2.8 Vistry support the change in base date, as set out in their previous representations, and therefore agree the March 2023 Standard Method figure of 676 homes per annum equates to a revised requirement of 10,816 overall. Vistry agree this method of calculating the housing requirement is appropriate rather than the methodology used in the submitted Local Plan, which adopted a mixed approach to using the Standard Method for some years and the figure in the emerging Local Plan for some years.</p> <p>2.9 Whilst the base date has changed to 2024, the end date has not been altered, which Vistry disagree with. The Plan Period is now 2024-2040, covering a 16-year period. However, when the Local Plan will be adopted in 2026, it leaves only a 14-year post adoption timeframe. Whilst the Inspectors noted in their 'Actions required following Hearing sessions' note (10 September 2025) they are taking a pragmatic approach to this, Vistry wish to note that this approach is completely contrary to the NPPF paragraph 22 which requires strategic policies to look ahead '...for a minimum of 15 year post adoption'.</p> <p>2.10 Vistry also note, whilst it is acknowledged WCC accelerated the preparation and submission of the Local Plan in order for it to be Examined under the December 2023 NPPF, which complies with transitional arrangements, the December 2024 Standard Method demonstrates a significant increase in housing need which the Local Plan has failed to try and accommodate.</p>

2.11 Table H2 is revised through this MM, which includes a decreased unmet needs allowance from 1,900 to 495 homes. Whilst Vistry understand the Inspector has accepted this figure: it is a very disappointing outcome to the EIP that the unmet need apportionment has reduced so significantly. Indeed, in light of the significant increase in housing requirement through the 2024 Standard Method, the subsequent drastic reduction of unmet need contribution surely undermines the purpose and intent of such an Examination.

2.12 This is particularly important when the wider context of unmet need in the PFSH area is considered. The Partnership for Southern Hampshire (PFSH) Spatial Position Statement (2023) (which includes the southern portion of Winchester) confirms there is unmet need of 11,000 homes between 2023 and 2036. However, this figure is based on the 2023 Standard Method and the actual figure for unmet need will be significantly higher when compared to the 2024 Standard Method.

2.13 The PFSH Spatial Position Statement confirms when compared to the 2024 Standard Method, the unmet need rises to 31,369 homes. There are physical constraints on some of the authorities in the PFSH, namely Havant, Portsmouth, New Forest and Gosport, which will make it difficult for them to achieve the quantum of housing required for them under the 2024 Standard Method.

2.14 Disappointingly the Inspectors note in their post-hearing notes that: "...ultimately unmet needs in the wider area, will need to be addressed by the Partnership for South Hampshire, in accordance with its Position Statement (2023) through all relevant Council's local plan preparation". However, the level of unmet need is clear in the PFSH statement, and yet through this local plan preparation, the quantum of contribution towards unmet need is drastically reduced. This approach calls into question whether the true unmet need will ever be met as it can be assumed that a similar approach could be taken in future local plan examinations.

2.15 The figure attributed to the South Downs National Park in the MM is 312 homes. The Housing Numbers and Sites Update (November 2025) explains this is the amount left from the original 350 dwelling capacity set out in the Submission version plan. The Inspector agreed the figure of 350 homes is sound, with any shortfall being dealt with by the Plan's supply exceeding housing need. Vistry Homes remain concerned about this assumption as during the Examination process the South Downs National Park Authority (SDNPA) made representations to indicate it does not consider 350 homes achievable within the National Park Area. Furthermore, WCC agreed in a SoCG with the SDNPA that a figure of 250 homes would be realistic.

2.16 When considering the updated figures in Table H2, there is an oversupply of 495 homes against the standard method requirement, with this oversupply comprising the unmet needs allowance. There is no provision in the Local Plan for unmet need in the South Downs National Park. This approach therefore poses a risk to the soundness of the Plan by creating a shortfall in housing provision which the draft Local Plan does not provide a solution for.

2.17 Finally, the approach to meeting housing need coming forward through this plan review is a further and very clear justification for the importance of the wording/requirement being set by Policy CN1 being sufficiently forceful. This current emerging plan could otherwise become a 'legacy development plan' within the reorganised new Hampshire authority which could easily present an inappropriate barrier to greater delivery of what are clearly much needed new homes to meet both Winchester District's and the wider neighbouring areas

	<p>housing needs ahead of the next salient development plan being adopted – which could conceivably take many more years from now to come forward.</p> <p>Main Mods representations o b o Vistry.pdf</p>
Officer Response	<p>The Council's position on the end date of the Local Plan is set out in paras. 1.38 to 1.39 of WCC's Hearings Statement for Matter 4. It is not considered that it is necessary or appropriate to extend the Plan period.</p> <p>It is considered that the Local Plan has considered unmet needs in the wider area and responded appropriately throughout the Plan-making process, as set out in section 4 of the Housing Topic Paper Update (ED02) and paras. 1.17 to 1.22 WCC's Hearings Statement for Matter 4. MM6 sets out the Council's commitment to a local plan review.</p> <p>The SoCG with South Downs National Park Authority (SDNPA) recognises the uncertainty regarding the amount of housing development that will come forward in the SDNP. The forthcoming SDNP Plan Examination will consider this issue further. Given the ongoing uncertainty, it is considered there is no compelling justification for revising the level of development which is anticipated to come forward within the Park. Para. 1.14 to 1.16 of SCC's Hearings Statement for Matter 4 confirms that if the estimate of 350 proves to be too high, any shortfall can be provided from the 'unmet needs allowance'.</p> <p>Disagree with proposed changes.</p>

MM2040 22 - South Downs National Park Authority (SDNPA)

Name	Mr Lewis Ford
Representor Number	MM2040 22
Representation Number	MM2040 22-3
Representation Summary	<p>Object to amount of housing expected to come forward in South Downs National Park (SDNP). A Reg 19 Plan will be published in February setting out proposals for 245 homes in the SDNP between 2024/25 and 2039/40.</p> <p>Proposes SDNP figure should be revised from 312 to 245 homes, with consequential reduction in the unmet needs allowance from 495 to 428 dwellings.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The SDNPA set out its position about the number of new homes that could be delivered in the SDNP Area of Winchester District in the Statement of Common Ground (SoCG) signed between WCC and the SDNPA in August 2024. At the time, the SDNPA suggested the potential delivery of 250 dwellings and it was agreed</p>

	<p>by both authorities that the unmet needs allowance in the Winchester Local Plan 2040 could be used, if necessary, to resolve potential shortfalls in housing delivery in the SDNP Area of Winchester District.</p> <p>The SDNPA is taking a draft Regulation 19 Local Plan through Committee processes in February and March 2026 with a view to publishing it for comments in May/June 2026 and submitting it for examination in November 2026. This Regulation 19 Local Plan identifies a supply of 245 homes to be delivered in the SDNP Area of Winchester District between 2024/25 and 2039/40 (16 years). This supply comprises:</p> <ul style="list-style-type: none"> • 10 dwellings from 2024/25 completions; • 18 dwellings from extant planning permissions as of 31 March 2025; • 126 dwellings from predicted windfall up to 2039/40; • 32 dwellings from existing allocations in the adopted South Downs Local Plan; • 22 dwellings from existing allocations in the Twyford Neighbourhood Plan; and • 37 dwellings from potential new allocations in the emerging draft Regulation 19 South Downs Local Plan (anticipated for consultation and submission in 2026). <p>Due to above, the following is recommended in the Plan and Appendix A (Housing Table Figures):</p> <ul style="list-style-type: none"> • The SDNP Area figure should be changed from 312 to 245 homes; and • The unmet needs allowance for neighbouring authorities should be changed from 495 to 428 homes (to reflect the above). <p>Supporting Information</p> <ol style="list-style-type: none"> 1. 260113 - SDNPA representation_Redacted.pdf
<p>Officer Response</p>	<p>The Statement of Common Ground (SoCG) with SDNPA (SD08j) set out WCC's position that SDNP could deliver 350 homes 2020-2040, and the SDNPA position that over the same period 250 could be delivered.</p> <p>The Council's Hearings Statement for Matter 4 noted that uncertainty over the capacity of the SDNP part of the District will remain beyond the examination period (para. 1.14) and the SoCG reflects this. The July 2025 LDS for the SDNP Plan anticipates adoption of the plan in the last quarter of 2028.</p> <p>The amount of homes which will come forward within the National Park is subject to Examination and could be liable to change. To demonstrate this, the figure now proposed by SDNPA for 2024-2040 already represents an increase in their previous position for 2020-2040, once the 38 completions 2020-2024 are taken into account.</p> <p>On balance it is considered that there is no compelling need to revised the Plan in response to this, given the ongoing uncertainty regarding the level of development which will come forward in the National Park.</p>

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-7
Representation Summary	<p>Support re-basing of the housing requirement to a base-date of 1st April 2024.</p> <p>Concern Table H2 refers to 11,311 homes and the policy refers to "about 11,000". States Policy H2 should state "at least 11,000".</p> <p>Consider anticipated delivery in SDNP should be reduced to 280 dwellings in line with recent windfall in the Park.</p> <p>Reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need.</p> <p>Concern that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan.</p> <p>Notes the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, and states the trajectory shows a drop in delivery post 2032. Considers the plan has no contingency and is unsound.</p> <p>Considers the Plan cannot commit to providing homes for Portsmouth and Havant given other factors. and has not met the NPPF requirement for effective cooperation.</p> <p>Comments on Appendix A (Housing Table Figures (ED42b).</p> <p>Requirement of 676dpa is incorrect - should be 688 based upon a requirement of 11,000 2024-2040.</p> <p>States a buffer of 5% is required for the five-year period, and notes that from July 2026 a 20% buffer will be required for decision-making purposes. This will result in a fragile supply position against the requirement.</p> <p>Considers housing supply was not fully explored, but maintains the following concerns with the 5 year period as at 1 April 2025. The reductions sought cumulatively total 498 dwelling, leaving the 5 year supply position in shortfall.</p> <ol style="list-style-type: none"> 1. 14 Chesil Street. Permission has lapsed and site is now is not available. 2. Whitely Green has been allocated for a number of years and does not have planning permission. 3. Land off Tanners Lane, Denmead, is included for 18 homes, yet an application for 11 homes was refused and remains subject to appeal (as yet undetermined). 4. Barton Farm. Increased delivery rates are unsupported. 5. Station Approach is an active car park and is not therefore available. 6. CWR fails to meet the definition of deliverable. 7. Other sites within the trajectory (North Whiteley additional, Cornerways and Merrydale and Land at the Lakes) should not be included in the five-year supply 8. Ravenswood is not justified to deliver 100 homes in one year.

	<p>Whilst for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best. It would be helpful if the Inspector report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>												
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim fully support the re-basing of the housing requirement to a base- date of 1st April 2024. However, Table H2 and Policy H1 both misalign continue to present a negative, inflexible, and ineffective approach to addressing needs.</p> <p>The misalignment manifests from the clear contention that the District Housing requirement is 11,311 homes in supporting Table H2, yet the Policy Provision (as modified) is only 'about 11,000'. The Plan must identify a clear Policy Requirement, expressed as a minimum, addressing the need. Such unambiguity is required in order to monitor the effectiveness of the policy, including in relation to the rolling housing land supply. For reasons of soundness, including to provide consistency with the requirements of the NPPF (2023 version paras 11 b) and 16 c)), Policy H1 must be expressed as follows:</p> <p>'...Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2020-2040), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of at least 11,000 dwellings (net) in this period (excluding the South Downs National Park area),...'</p> <p>Notwithstanding the above, we note the Inspector's interim comments on the South Downs National Park Authority Allowance and would highlight that the 350 dwelling 'contribution' was previously split over a plan period of 20-years (17.5 dpa). Not only did the Park Authority consider an allowance of 250 homes to be more realistic, but the evidence is that over the first four-years of the plan period only 38 homes (350 – 312) have been secured within the National Park (9.5 dpa). As such, and given the buffer that does exist, albeit significantly limited, which the Inspectors expressly note can be called on to address any shortfall in provision from the National Park, the figures in Table H2 should be further modified as follows. This modification shows an annual provision of 17.5 homes in the National Park across the remaining 16 year housing-provision period, to better reflect the evidence base and be justified:</p> <table data-bbox="328 1843 1414 2078"> <tr> <td>Unmet Needs Allowance (for</td> <td>463</td> <td></td> </tr> <tr> <td>unmet need in neighbouring</td> <td>Outstanding planning</td> <td>5,186</td> </tr> <tr> <td>authorities</td> <td>permissions</td> <td></td> </tr> <tr> <td></td> <td>Other commitments</td> <td>579</td> </tr> </table>	Unmet Needs Allowance (for	463		unmet need in neighbouring	Outstanding planning	5,186	authorities	permissions			Other commitments	579
Unmet Needs Allowance (for	463												
unmet need in neighbouring	Outstanding planning	5,186											
authorities	permissions												
	Other commitments	579											

Windfall development

1,49

5 SDNP completions,

permissions and windfall 280

Again, notwithstanding the above and acknowledging the Inspector's interim comments, we would highlight the following.

Firstly, any contribution towards needs across the sub-region (PfSH area) in the period prior to 1st April 2024 relative to the district requirement, as calculated according to the SM LHN, would be reflected in the updated SM LHN at 1st April 2024, taking into account affordability ratios. The scale of unmet need can only be considered at a point in time, all base-dated at 1st April 2024. Previous provision is already accounted for in the SM calculation. Hence, reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need, the scale of which is significant (as set out in previous representations by tor&co and the HBF).

Secondly, it is concerning that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan. Accepting the plan only 'anticipates' meeting the LHN according to the now superseded methodology, the requirement and associated supply provides no flexibility and remains inconsistent with the NPPF.

This inflexibility is particularly concerning noting the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, for the purposes of decision-making. The Local Plan Housing Trajectory (MM50) highlights the concern, in an acute drop in delivery post 2032 (from the five- year period base-dated 1st April 2028). The plan has no contingency in this respect and remains unsound.

In short, the minimal buffer in provision of 495 homes (just 4.5% of the overall requirement and equivalent to 31 dpa) is heavily leaned upon to address: a) shortfalls in the South Downs National Park, b) increased annual requirements (+20%) for each rolling five year period until a new plan is in place, c) unmet need from neighbouring authorities, and d) and shortfall in delivery across the district more generally.

In this context, the plan cannot purport to commit to providing 150 homes for Portsmouth and 345 homes for Havant. It is clear that the modifications made, including the footnotes to Table H2, are unsupported by the evidence, scale of housing requirement, together with associated allocations made in the plan.

Irrespective of the Government's position on the Duty to Cooperate, the NPPF expects effective cooperation and for unmet needs to be accommodated 'where it is practical to do so'(NPPF 2023 para 35 a)). The plan as proposed to be modified, and its associated evidence base, fails to meet this requirement and is not positively prepared.

The plan has not been positively prepared, and the modifications proposed now further highlight the inadequacies.

Comments are also invited under MM49 with respect to the supporting evidence, including housing table figures (Appendix A for Main Mods). First it is notable that the 'requirement' is identified as 676 dpa. However the updated requirement (within

Winchester District and excluding the South Downs National Park) of 11,000 homes across the 16 year period 2024 – 2040 amounts to a basic requirement of 688 dpa.

For the five-year period a 5% buffer is required, increasing the annual requirement to 723 dpa and presenting an overall requirement of 3,612 homes. Added to this is the requirement from 2024/25, of 688 homes (without buffer) to correspond to the supply figures, presenting a requirement of 4,300 homes. Whilst for the purposes of decision-making only it remains relevant to note that as of 1st July 2026 a 20% buffer will be required, which will present a five-year requirement of 4,128 homes (or 4,816 from 2024).

The current cumulative supply for the current five year period, but also including the year 2024/25 is 5,302 homes, highlighting a fragile position against the requirement (5302 – 4816, which is only 486 in excess).

Because of the lack of a clear and up to date housing trajectory at the time of the hearings, housing land supply was not fully explored. However, Blenheim has previously commented in detail on a number of the delivery assumptions made by Winchester Council. For example, the following concerns are maintained with respect to the current five-year period, base-dated at 1st April 2025:

- 1) 14 Chesil Street Winchester is included in the supply for 13 homes, involving the demolition of the property adjacent to an existing theatre. However it is our understanding that the consent has lapsed and has since been superseded by plans to extend the Theatre. This site should be removed from the trajectory.
- 2) Whiteley Green remains in the trajectory for delivery of 30 homes with the five-year period, yet it has been allocated (under the existing Local Plan Part 2) for a number of years and does not have planning permission. The history and site status fails to support the test of the site being 'deliverable'.
- 3) Land off Tanners Lane, Denmead, is included for 18 homes, yet an application for 11 homes was refused and remains subject to appeal (as yet undetermined).
- 4) Barton Farm features in the trajectory for the delivery of 115 dpa, yet only one developer plus Registered Provider is involved and delivery rates between 2017 and 2023/24 have been at 85 dpa. Increased delivery rates are unsupported, reducing the supply by 150 homes.
- 5) Station Approach features in the trajectory for 35 homes, yet it is an active car park and is not therefore available.
- 6) The Central Regeneration Area features in the trajectory for 50 homes, and it is understood that a hybrid planning application may be submitted this year, but at the present time with application lead in times and the need for site clearance etc this site fails to meet the definition of deliverable.
- 7) Other sites within the trajectory but for which sufficient progress has been made (North Whiteley additional, Cornerways and Merrydale and Land at the Lakes) should not be included in the five-year supply, amounting to 152 homes.
- 8) Finally, it is unclear as to why the Ravenswood site would deliver 100 homes in a single year, whilst only delivering 50 / 30 / 20 homes in other years. A reduction to 50 homes (from 100) in 2029/30 would be appropriate.

	<p>The above supports the deletion of circa 498 homes from the supply, reducing it to 4,804 homes from 2024 (looking at the current five-year period but taking into supply from 2024/25). The position will be in shortfall.</p> <p>Whilst, for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best, indicating that the five-year position cannot be carried forward with any confidence and is subject to challenge for decision-making purposes, particularly from July this year. The position is further exacerbated if the approach is taken that any over- supply from 2024/25 should not be accounted for in the current five-year period (including in the context of the new SM LHN), in which case the supply would be in further shortfall.</p> <p>In conclusion, it would be helpful if the Inspector Report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>
<p>Officer Response</p>	<p>Table H2 sets out the total housing development anticipated to come forward in Winchester District over the period 2024-2040. Policy H1 sets out the housing provision in the Winchester Plan area. Therefore they fulfil different purposes and set out different information. It is considered the supporting text (including paragraph 9.20) makes this clear. It is not considered necessary or appropriate for the wording in the Local Plan to be changed.</p> <p>Disagree with the proposed change to Policy H1 - to replace "about" with "at least". This issue was discussed in the examination hearings in relation to Policy SP2. The wording is considered appropriate and has been in the adopted development plan for many years. It has never resulted in confusion regarding the target for housing delivery. It has not prevented the housing targets in the adopted plan from being exceeded, as per paragraphs 1.11 to 1.13 of WCC's Hearings Statement for Matter 3.</p> <p>Disagree with proposed reduction in delivery within the South Downs National Park (SDNP). The Council has set out what it considers likely to be delivered in the SDNP in the Statement of Common Ground with the SDNPA, which has resulted in a figure of 312 homes for the period 2024-2040. Amending this to 280 dwellings on the basis of delivery trends over the past four years is not considered a robust approach.</p> <p>Comments regarding the standard methodology and unmet needs are noted. No amendment is suggested.</p> <p>The Council considers that, for the purposes of plan-making, It is not necessary to include a 'buffer' to allow for non-delivery, especially given the high levels of housing provision expected in the early years of the Plan period for the reasons set out in para. 9.20 of the Regulation 19 Plan (SD01).</p> <p>The Council considers that following the adoption of this Plan is can demonstrate a five year supply of homes with a 20% buffer from 1 July this year. the revised housing trajectory does show housing delivery falling after 2032, but at no point will the cumulative delivery fall into shortfall, and the target for each year is exceeded until 2034. This is considered a sound position with sufficient time for a review of the Local Plan to be undertaken in accordance with MM6.</p> <p>In summary, the Council considers that it can commit to providing 150 homes for Portsmouth and 345 homes for Havant in this Local Plan as per the Statements of Common Ground with those authorities.</p>

	<p>Regarding Appendix A Housing Table Figures (ED42b), it is accepted that the housing requirement for the plan area is 10,999 dwellings, which is equivalent to 687 dwellings per annum. Because the Winchester Plan area only covers that part of the district which falls outside the South Downs National Park, the Plan sets out how the Local Housing Need using the standard method for Winchester District will be met, proposals for housing delivery within the Winchester Plan area and an anticipated housing delivery within the South Downs National Park. It is considered that this bespoke approach is warranted by the circumstances and is best reflected in the proposed housing trajectory set out document ED42b - i.e. to show delivery against the Local Housing Need rather than the Plan area requirement. This approach is considered to be in accordance with para. 75 of the December 2023 NPPF. However, it would improve the clarity of this approach if reference to "housing requirement" in the Trajectory was replaced with reference to "housing need". This would not change the position regarding the councils obligations for monitoring housing delivery against the plan housing requirement under the proposed monitoring framework.</p> <p>The respondent maintains their concerns regarding the anticipated delivery of sites. The Council's position on site delivery is set out in paragraphs 1.79 to 1.97 and Appendix A of the Council's Hearings Statement for Matter 4, the Housing Topic Paper Update (ED02), and the Authorities Monitoring Report 2023-2024 Appendices (ED03b).</p> <p>The respondent does not suggest their position warrants that the Plan be found unsound, but seeks a comment in the Inspector's report regarding the "fragility of supply". It will be for the Inspector to decide what to include in her report, but the Council would note that the purpose of forthcoming report is to consider the soundness of the Plan, and in any event the ongoing housing supply position will be subject to ongoing monitoring and testing through the development management process.</p>
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MM2040 24 - Helen Ross

Name	Helen Ross
Representor Number	MM2040 24
Representation Number	MM2040 24-3
Representation Summary	<p>Refer to separate document from Emery Planning setting out concerns with housing delivery. Considers the Council will not be able to demonstrate a 5 year land supply with a 20% buffer on adoption of the Plan.</p> <p>Concerns on housing supply are as follows -</p> <p>Lower build out rates at Barton Farm, dispute sites should be considered deliverable, reduction in windfall and a revision of the local plan housing target to 707 dwellings.</p> <p>Considers that additional/ alternative options for allocation remain available in Otterbourne to meet this need, including Land off Cranbourne Drive, and notes concerns about capacity of proposed allocation OT01.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Please refer to Emery Planning Response to the Proposed Modifications December 2025 submitted on behalf of Barwood Land via e-mail on 14th January 2026 in response to Main Modifications MM49, ED42a and ED42b.</p> <p>Representation copied from attached document in relation to H1:</p> <p>Emery Planning’s response to the Main Modifications consultation regarding overall housing supply also confirms that updates are required to the Council’s Housing Trajectory. These include adjusted build rates at Barton Farm, sites removed from the first five years where there is no clear evidence of deliverability, a reduction in the windfall allowance and the inclusion of the correct annual housing requirement figure of 707 dwellings. With these required amendments in place, it is evident that the Council will not be able to demonstrate a 5YHLS (with a 20% buffer) upon adoption of the plan.</p> <p>It is clear from the evidence available that additional/ alternative options for allocation remain available in Otterbourne to meet this need, including Land off Cranbourne Drive (suitable to deliver up to 76 dwellings). This site is recorded as both deliverable and developable in the Strategic Housing & Employment Land Availability Assessment and the recently withdrawn appeal confirmed that there are no outstanding technical constraints to the site’s delivery (it was simply not considered acceptable on grounds of principle at this stage as it was located outside but adjacent to the settlement boundary).</p> <p>As set out in earlier representations, we continue to be of the opinion that policy OT01 has not been positively prepared and is not robustly justified by the evidence available. Whilst we acknowledge the late stage in the Local Plan’s progression, we continue to strongly believe that the housing need proposed for Otterbourne should be higher given the sustainable credentials of the settlement, the allocation proposed is not considered suitable to meet the capacity proposed, the windfall allowance remains too high and with the noted concerns regarding the Council’s ability to evidence a five year land supply on adoption as set out in Emery Planning’s response to the Main Mods consultation, in our opinion it remains clear further allocations should be included to suitably address this need. We hope the contents of this letter is self explanatory, but should you require any further information please do not hesitate to contact us.</p> <p>Supporting Information</p> <ol style="list-style-type: none"> 1. 735 Winchester Main Mods LP Response - Barwood Land_Redacted.pdf 2. Response to proposed modifications - Barwood - December 2025.pdf
<p>Officer Response</p>	<p>The Council’s position on housing delivery is set out in para. 1.79 to 1.97 and Appendix A of the Council’s Hearings Statement for Matter 4, the Housing Topic Paper Update (ED02) and the Authorities Monitoring Report 2023-2024 Appendices (ED03b).</p> <p>The approach to windfall is set out in the Windfall Study (HA07) and paras. 1.60 to 1.65 of WCC’s Hearings Statement for Matter 4. It is not considered that the figures in Table H2 and Policy H1 include any double counting.</p>

	<p>Regarding Appendix A Housing Table Figures (ED42b), accepted that the Revised Housing Trajectory intended to form Appendix v of the Plan (outlined in MM50) is based upon the Standard Method figure of 676dpa. It is not agreed that this should be revised to 7070dpa, as that figure contains the anticipated delivery within SDNP. However, it is considered the delivery should be assessed against the target for the plan area of 10,999 homes, divided by 16 years (687.4dpa). Therefore an amended housing trajectory has been prepared to make this clear and is proposed as a revision to MM50. This is considered a minor revision to this modification.</p> <p>The justification for the development strategy is set out in the Development Strategy and Site Selection Topic Paper (SD10b) and it is not considered that the proposed change is necessary.</p>
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MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-5
Representation Summary	<p>Support re-basing of the housing requirement to a base-date of 1st April 2024.</p> <p>Concern Table H2 refers to 11,311 homes and the policy refers to "about 11,000". States Policy H2 should state "at least 11,000".</p> <p>Consider anticipated delivery in SDNP should be reduced to 280 dwellings in line with recent windfall in the Park.</p> <p>Reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need.</p> <p>Concern that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan.</p> <p>Notes the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, and states the trajectory shows a drop in delivery post 2032. Considers the plan has no contingency and is unsound.</p> <p>Considers the Plan cannot commit to providing homes for Portsmouth and Havant given other factors. and has not met the NPPF requirement for effective cooperation.</p> <p>Comments on Appendix A (Housing Table Figures (ED42b)).</p> <p>Requirement of 676dpa is incorrect - should be 688 based upon a requirement of 11,000 2024-2040.</p> <p>States a buffer of 5% is required for the five-year period, and notes that from July 2026 a 20% buffer will be required for decision-making purposes. This will result in a fragile supply position against the requirement.</p> <p>Considers housing supply was not fully explored, but maintains the following concerns with the 5 year period as at 1 April 2025. The reductions sought cumulatively total 498 dwelling, leaving the 5 year supply position in shortfall.</p> <p>1. 14 Chesil Street. Permission has lapsed and site is now is not available.</p>

	<p>2. Whitely Green has been allocated for a number of years and does not have planning permission.</p> <p>3. Land off Tanners Lane, Denmead, is included for 18 homes, yet an application for 11 homes was refused and remains subject to appeal (as yet undetermined).</p> <p>4. Barton Farm. Increased delivery rates are unsupported.</p> <p>5. Station Approach is an active car park and is not therefore available.</p> <p>6. CWR fails to meet the definition of deliverable.</p> <p>7. Other sites within the trajectory (North Whiteley additional, Cornerways and Merrydale and Land at the Lakes) should not be included in the five-year supply</p> <p>8. Ravenswood is not justified to deliver 100 homes in one year.</p> <p>Whilst for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best. It would be helpful if the Inspector report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bargate fully support the re-basing of the housing requirement to a base- date of 1st April 2024. However, Table H2 and Policy H1 both misalign continue to present a negative, inflexible, and ineffective approach to addressing needs.</p> <p>The misalignment manifests from the clear contention that the District Housing requirement is 11,311 homes in supporting Table H2, yet the Policy Provision (as modified) is only 'about 11,000'. The Plan must identify a clear Policy Requirement, expressed as a minimum, addressing the need. Such unambiguity is required in order to monitor the effectiveness of the policy, including in relation to the rolling housing land supply. For reasons of soundness, including to provide consistency with the requirements of the NPPF (2023 version paras 11 b) and 16 c)), Policy H1 must be expressed as follows:</p> <p>'...Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2020-2040), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of at least 11,000 dwellings (net) in this period (excluding the South Downs National Park area),...'</p> <p>Notwithstanding the above, we note the Inspector's interim comments on the South Downs National Park Authority Allowance and would highlight that the 350 dwelling 'contribution' was previously split over a plan period of 20-years (17.5 dpa). Not only did the Park Authority consider an allowance of 250 homes to be more realistic, but the evidence is that over the first four-years of the plan period only 38 homes (350 – 312) have been secured within the National Park (9.5 dpa).</p>

As such, and given the buffer that does exist, albeit significantly limited, which the Inspectors expressly note can be called on to address any shortfall in provision from the National Park, the figures in Table H2 should be further modified as follows. This modification shows an annual provision of 17.5 homes in the National Park across the remaining 16 year housing-provision period, to better reflect the evidence base and be justified:

**Unmet Needs Allowance (for 463
Outstanding planning
5,186 unmet need in neighbouring
permissions**

authorities

**Other commitments 579
Windfall development
1,49**

**5 SDNP completions,
permissions and windfall 280**

Again, notwithstanding the above and acknowledging the Inspector's interim comments, we would highlight the following.

Firstly, any contribution towards needs across the sub-region (PfSH area) in the period prior to 1st April 2024 relative to the district requirement, as calculated according to the SM LHN, would be reflected in the updated SM LHN at 1st April 2024, taking into account affordability ratios. The scale of unmet need can only be considered at a point in time, all base-dated at 1st April 2024. Previous provision is already accounted for in the SM calculation. Hence, reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need, the scale of which is significant (as set out in previous representations by tor&co and the HBF).

Secondly, it is concerning that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan. Accepting the plan only 'anticipates' meeting the LHN according to the now superseded methodology, the requirement and associated supply provides no flexibility and remains inconsistent with the NPPF.

This inflexibility is particularly concerning noting the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, for the purposes of decision-making.

The Local Plan Housing Trajectory (MM50) highlights the concern, in an acute drop in delivery post 2032 (from the five-year period base-dated 1st April 2028). The plan has no contingency in this respect and remains unsound.

In short, the minimal buffer in provision of 495 homes (just 4.5% of the overall requirement and equivalent to 31 dpa) is heavily leaned upon to address: a) shortfalls in the South Downs National Park, b) increased annual requirements (+20%) for each rolling five year period until a new plan is in place, c) unmet need from neighbouring authorities, and d) and shortfall in delivery across the district more generally.

In this context, the plan cannot purport to commit to providing 150 homes for Portsmouth and 345 homes for Havant. It is clear that the modifications made, including the footnotes to Table H2, are unsupported by the evidence, scale of housing requirement, together with associated allocations made in the plan.

Irrespective of the Government's position on the Duty to Cooperate, the NPPF expects effective cooperation and for unmet needs to be accommodated '*where it is practical to do so*' (NPPF 2023 para 35 a)). The plan as proposed to be modified, and its associated evidence base, fails to meet this requirement and is not positively prepared.

The plan has not been positively prepared, and the modifications proposed now further highlight the inadequacies.

Comments are also invited under MM49 with respect to the supporting evidence, including housing table figures (Appendix A for Main Mods). First it is notable that the 'requirement' is identified as 676 dpa. However the updated requirement (within Winchester District and excluding the South Downs National Park) of 11,000 homes across the 16 year period 2024 – 2040 amounts to a basic requirement of 688 dpa.

For the five-year period a 5% buffer is required, increasing the annual requirement to 723 dpa and presenting an overall requirement of 3,612 homes. Added to this is the requirement from 2024/25, of 688 homes (without buffer) to correspond to the supply figures, presenting a requirement of 4,300 homes. Whilst for the purposes of decision-making only it remains relevant to note that as of 1st July 2026 a 20% buffer will be required, which will present a five-year requirement of 4,128 homes (or 4,816 from 2024).

The current cumulative supply for the current five year period, but also including the year 2024/25 is 5,302 homes, highlighting a fragile position against the requirement (5302 – 4816, which is only 486 in excess).

Because of the lack of a clear and up to date housing trajectory at the time of the hearings, housing land supply was not fully explored. However, Bargate has previously commented in detail on a number of the delivery assumptions made by Winchester Council. For example, the following concerns are maintained with respect to the current five-year period, base-dated at 1st April 2025:

1) 14 Chesil Street Winchester is included in the supply for 13 homes, involving the demolition of the property adjacent to an existing theatre. However it is our understanding that the consent has lapsed and has since been superseded by plans to extend the Theatre. This site should be removed from the trajectory.

2) Whiteley Green remains in the trajectory for delivery of 30 homes with the five-year period, yet it has been allocated (under the existing Local Plan Part 2) for a number of years and does not have planning permission. The history and site status fails to support the test of the site being 'deliverable'.

3) Land off Tanners Lane, Denmead, is included for 18 homes, yet an application for 11 homes was refused and remains subject to appeal (as yet undetermined).

4) Barton Farm features in the trajectory for the delivery of 115 dpa, yet only one developer plus Registered Provider is involved and delivery rates between 2017 and 2023/24 have been at 85 dpa. Increased delivery rates are unsupported, reducing the supply by 150 homes.

	<p>5) Station Approach features in the trajectory for 35 homes, yet it is an active car park and is not therefore available.</p> <p>6) The Central Regeneration Area features in the trajectory for 50 homes, and it is understood that a hybrid planning application may be submitted this year, but at the present time with application lead in times and the need for site clearance etc this site fails to meet the definition of deliverable.</p> <p>7) Other sites within the trajectory but for which sufficient progress has been made (North Whiteley additional, Cornerways and Merrydale and Land at the Lakes) should not be included in the five-year supply, amounting to 152 homes.</p> <p>8) Finally, it is unclear as to why the Ravenswood site would deliver 100 homes in a single year, whilst only delivering 50 / 30 / 20 homes in other years. A reduction to 50 homes (from 100) in 2029/30 would be appropriate.</p> <p>The above supports the deletion of circa 498 homes from the supply, reducing it to 4,804 homes from 2024 (looking at the current five-year period but taking into supply from 2024/25). The position will be in shortfall.</p> <p>Whilst, for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best, indicating that the five-year position cannot be carried forward with any confidence and is subject to challenge for decision-making purposes, particularly from July this year. The position is further exacerbated if the approach is taken that any over-supply from 2024/25 should not be accounted for in the current five-year period (including in the context of the new SM LHN), in which case the supply would be in further shortfall.</p> <p>In conclusion, it would be helpful if the Inspector Report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>
<p>Officer Response</p>	<p>Table H2 sets out the total housing development anticipated to come forward in Winchester District over the period 2024-2040. Policy H1 sets out the housing provision in the Winchester Plan area. Therefore they fulfil different purposes and set out different information. It is considered the supporting text (including paragraph 9.20) makes this clear. It is not considered necessary or appropriate for the wording in the Local Plan to be changed.</p> <p>Disagree with the proposed change to Policy H1 - to replace "about" with "at least". This issue was discussed in the examination hearings in relation to Policy SP2. The wording is considered appropriate and has been in the adopted development plan for many years. It has never resulted in confusion regarding the target for housing delivery. It has not prevented the housing targets in the adopted plan from being exceeded, as per paragraphs 1.11 to 1.13 of WCC's Hearings Statement for Matter 3.</p> <p>Disagree with proposed reduction in delivery within the South Downs National Park (SDNP). The Council has set out what it considers likely to be delivered in the SDNP in the Statement of Common Ground with the SDNPA, which has resulted in a figure of 312 homes for the period 2024-2040. Amending this to 280 dwellings on the basis of delivery trends over the past four years is not considered a robust approach.</p> <p>Comments regarding the standard methodology and unmet needs are noted. No amendment is suggested.</p>

	<p>The Council considers that, for the purposes of plan-making, It is not necessary to include a 'buffer' to allow for non-delivery, especially given the high levels of housing provision expected in the early years of the Plan period for the reasons set out in para. 9.20 of the Regulation 19 Plan (SD01).</p> <p>The Council considers that following the adoption of this Plan is can demonstrate a five year supply of homes with a 20% buffer from 1 July this year. the revised housing trajectory does show housing delivery falling after 2032, but at no point will the cumulative delivery fall into shortfall, and the target for each year is exceeded until 2034. This is considered a sound position with sufficient time for a review of the Local Plan to be undertaken in accordance with MM6.</p> <p>In summary, the Council considers that it can commit to providing 150 homes for Portsmouth and 345 homes for Havant in this Local Plan as per the Statements of Common Ground with those authorities.</p> <p>Regarding Appendix A Housing Table Figures (ED42b), it is accepted that the housing requirement for the plan area is 10,999 dwellings, which is equivalent to 687 dwellings per annum. Because the Winchester Plan area only covers that part of the district which falls outside the South Downs National Park, the Plan sets out how the Local Housing Need using the standard method for Winchester District will be met, proposals for housing delivery within the Winchester Plan area and an anticipated housing delivery within the South Downs National Park. It is considered that this bespoke approach is warranted by the circumstances and is best reflected in the proposed housing trajectory set out document ED42b - i.e. to show delivery against the Local Housing Need rather than the Plan area requirement. This approach is considered to be in accordance with para. 75 of the December 2023 NPPF. However, it would improve the clarity of this approach if reference to "housing requirement" in the Trajectory was replaced with reference to "housing need". This would not change the position regarding the councils obligations for monitoring housing delivery against the plan housing requirement under the proposed monitoring framework.</p> <p>The respondent maintains their concerns regarding the anticipated delivery of sites. The Council's position on site delivery is set out in paragraphs 1.79 to 1.97 and Appendix A of the Council's Hearings Statement for Matter 4, the Housing Topic Paper Update (ED02), and the Authorities Monitoring Report 2023-2024 Appendices (ED03b).</p> <p>The respondent does not suggest their position warrants that the Plan be found unsound, but seeks a comment in the Inspector's report regarding the "fragility of supply". It will be for the Inspector to decide what to include in her report, but the Council would note that the purpose of forthcoming report is to consider the soundness of the Plan, and in any event the ongoing housing supply position will be subject to ongoing monitoring and testing through the development management process.</p>
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MM2040 41 - Home Builders Federation

Name	Mr Mark Behrendt
Representor Number	MM2040 41
Representation Number	MM2040 41-2
Full Representation	In terms of this Main Modification do you? * Support

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>HBF support the proposed modifications to H1 how we continue to consider it to be necessary for soundness for the period over which housing needs is considered to be extended to ensure consistency with paragraph 22 of the NPPF.</p>
Officer Response	Support is noted for the period over which housing needs are considered.

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-9
Representation Summary	<p>Support re-basing of the housing requirement to a base-date of 1st April 2024.</p> <p>Concern Table H2 refers to 11,311 homes and the policy refers to "about 11,000". States Policy H2 should state "at least 11,000".</p> <p>Consider anticipated delivery in SDNP should be reduced to 280 dwellings in line with recent windfall in the Park.</p> <p>Reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need.</p> <p>Concern that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan.</p> <p>Notes the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, and states the trajectory shows a drop in delivery post 2032. Considers the plan has no contingency and is unsound.</p> <p>Considers the Plan cannot commit to providing homes for Portsmouth and Havant given other factors. and has not met the NPPF requirement for effective cooperation.</p> <p>Comments on Appendix A (Housing Table Figures (ED42b)).</p> <p>Requirement of 676dpa is incorrect - should be 688dpa based upon a requirement of 11,000 homes 2024-2040.</p> <p>States a buffer of 5% is required for the five-year period, and notes that from July 2026 a 20% buffer will be required for decision-making purposes. This will result in a fragile supply position against the requirement.</p> <p>Considers housing supply was not fully explored, but maintains the following concerns with the 5 year period as at 1 April 2025. The reductions sought cumulatively total 135 dwellings.</p> <p>1. Station Approach is an active car park and is not therefore available.</p>

	<p>2. CWR fails to meet the definition of deliverable.</p> <p>3. Ravenswood is not justified to deliver 100 homes in one year.</p> <p>Also refers to concerns raised by tor&co that another 363 dwellings should be deleted from the supply. (see 204044-10).</p> <p>Whilst for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best. It would be helpful if the Inspector report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning</u></p> <p>Bloor Homes supports the re-basing of the housing requirement to a base-date of 1 April 2024. However, Table H2 and Policy H1 are misaligned and continue to reflect a negative, rigid, and ineffective approach to meeting housing needs.</p> <p>This inconsistency arises because Table H2 identifies a District housing requirement of 11,311 homes, whereas Policy H1 (as modified) refers only to 'about 11,000 homes'. The Plan must set out a clear and unambiguous policy requirement, expressed as a minimum figure in order to sufficiently address identified needs. This clarity is essential for monitoring policy effectiveness, including in relation to the rolling five-year housing land supply.</p> <p>For reasons of soundness and to ensure consistency with the NPPF (2023 version paras 11 b) and 16 c)), Policy H1 should be amended as follows:</p> <p><i>'...Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2020-2040), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of at least 11,000 dwellings (net) in this period (excluding the South Downs National Park area) ...'</i></p> <p>We note the Inspector's interim comments on the South Downs National Park Authority allowance. The 'contribution' of 350 dwellings was previously spread across a 20-year period, equating to 17.5 dwellings per annum. However, the Park Authority itself considered a contribution of 250 homes to be more realistic. The evidence demonstrates that during the first four-years of the plan period, only 38 homes (350 minus 312) have been delivered within the National Park, equating to just 9.5 dwellings per annum.</p> <p>In these circumstances, and recognising that only a very limited buffer exists, which the Inspector has expressly identified as being available to address any shortfall from the National Park, the figures in Table H2 should be further amended</p>

as set out below. This would reflect an annual provision of 17.5 dwellings within the National Park over the remaining 16-year housing period and would be more consistent with the evidence base:

Unmet Needs Allowance (for unmet need in neighbouring authorities): 463 (as opposed to 495)

Outstanding planning permissions: 5,186

Other commitments: 579

Windfall development: 1,495

SDNP completions, permissions and windfall: 280 (as opposed to 312)

Notwithstanding the above and having regard to the Inspector's interim comments, Bloor Homes raise the following additional concerns.

Firstly, any contribution towards unmet needs across the sub-region (PfSH area) prior to 1 April 2024 relative to the district requirement, as calculated according to the SM LHN, would be reflected in the updated SM LHN at 1 April 2024, taking into account affordability ratios. The scale of unmet need can only be considered at a point in time, base-dated at 1st April 2024. Previous provision is already accounted for in the Standard Method calculation and cannot justify reducing the scale of future contribution to unmet need, which remains significant as set out in previous representations).

Secondly, it is of serious concern that the entirety of the Plan's limited 'buffer' is being relied upon to meet unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan. Accepting the plan only 'anticipates' meeting the LHN according to the now superseded methodology. The identified requirement and supply therefore provide no genuine flexibility and remain inconsistent with the NPPF.

This lack of flexibility is particularly problematic given the requirement for Winchester Council to demonstrate a five-year housing land supply with a 20% buffer from 1 July this year for decision-making purposes. The Housing Trajectory (MM50) shows a sharp decline in delivery after 2032 (from the five-year period base-dated 1st April 2028), yet the Plan includes no contingency measures to address this. The Plan therefore remains unsound.

In summary, the minimal buffer of just 496 homes, representing only 4.5% of the overall requirement and equating to 31 dwellings per annum, is being heavily relied upon to address:

- a) shortfalls within the South Downs National Park.
- b) increased annual requirements (+20%) in each rolling five-year period until a new plan is adopted.
- c) unmet needs from neighbouring authorities; and
- d) general under-delivery across the district.

Against this backdrop, the Plan cannot credibly commit to delivering 345 homes for Havant and 150 homes for Portsmouth. The proposed modifications, including the footnotes to Table H2, are not supported by the evidence, the scale of housing need, or the proposed allocations.

Regardless of the Government's position on the Duty to Cooperate, the NPPF requires effective cooperation and that unmet needs are accommodated '*where it is practical to do so*' (NPPF 2023 para 35 a)). The modified Plan and its evidence base fail to meet this requirement and have not been positively prepared.

The plan has therefore not been positively prepared, and the proposed modifications further highlight these shortcomings.

The supporting evidence in MM49 (Appendix A for Main Modifications) identifies a 'requirement' of 676 dwellings per annum. However, the updated requirement for Winchester District (excluding the South Downs National Park) of 11,000 homes across the 16-year period 2024 – 2040 equates to a requirement of 688 dpa.

For the five-year period a 5% buffer is required, increasing the annual requirement to 723 dpa giving a total five-year requirement of 3,612 homes.

Added to this is the requirement from 2024/25, of 688 homes (without buffer) to correspond to the supply figures, presenting a requirement of 4,300 homes.

Whilst for the purposes of decision-making only it remains relevant to note that as of 1st July 2026, a 20% buffer will apply, which will present a five-year requirement of 4,128 homes (or 4,816 from 2024).

The current cumulative supply for the five-year period, including 2024/25 is 5,302 homes, revealing a fragile position relative to the requirement (5,302 – 4,816, leaving a margin of just 486 homes).

In the absence of a clear, up to date housing trajectory at the hearings, the issue of housing land supply was not fully explored. Bloor Homes continues to raise its previous concerns regarding the delivery assumptions made by Winchester Council. The following points remain outstanding in relation to the current five-year period, base-dated at 1st April 2025:

- 1) Station Approach (Policy W8) features in the trajectory for 35 homes, yet the site is an active car park and is not therefore available.
- 2) The Central Regeneration Area (Policy W7) features in the trajectory for 50 homes, and it is understood that a hybrid planning application may be submitted this year, but at the present time with application lead in times and the need for site clearance etc. this site fails to meet the definition of deliverable.
- 3) Finally, it is unclear as to why the Ravenswood site (Policy KN1) would deliver 100 homes in a single year, whilst only delivering 50 / 30 / 20 homes in other years. A reduction to 50 homes (from 100) in 2029/30 would be appropriate.

These adjustments support the circa 135 homes from the supply, reducing it to 5,167 homes from 2024 (looking at the current five-year period but taking into supply from 2024/25). Based on other representations submitted by tor&co, a further 363 homes should be deleted, further lowering the total supply to 4,804 homes. Against the requirement of 4,816 homes, this results in a shortfall in the five-year supply.

Whilst, for the purposes of plan-making, we do not consider the position to warrant a conclusion of unsoundness, it is evident that the five-year supply is, at best, marginal. This indicates that the five-year position cannot be carried forward with any confidence and is subject to challenge for decision-making purposes, particularly from July of this year. The situation is further worsened if the approach

	<p>is taken that any over-supply from 2024/25 should not be accounted for in the current five-year period (including in the context of the new Standard Method Local Housing Need), which would result in an even greater shortfall.</p> <p>In conclusion, it would be useful for the Inspector's Report to recognise this fragile supply position, which further underscores the urgent need to progress the review of the local plan promptly, guided by a clear and robust timetable.</p> <p>Policy WK5 (Land at Mill Lane, Wickham) can be delivered within the first five years of the plan period; however, this is not reflected in the revised housing trajectory and should be amended accordingly.</p> <p><u>Proposed change</u></p> <p>Please refer to the reasoning above.</p> <p>Policy H1 should be expressed as follows:</p> <p><i>'...Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2020-2040), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of at least 11,000 dwellings (net) in this period (excluding the South Downs National Park area) ...'</i></p>
<p>Officer Response</p>	<p>Table H2 sets out the total housing development anticipated to come forward in Winchester District over the period 2024-2040. Policy H1 sets out the housing provision in the Winchester Plan area. Therefore they fulfil different purposes and set out different information. It is considered the supporting text (including paragraph 9.20) makes this clear. It is not considered necessary or appropriate for the wording in the Local Plan to be changed.</p> <p>Disagree with the proposed change to Policy H1 - to replace "about" with "at least". This issue was discussed in the examination hearings in relation to Policy SP2. The wording is considered appropriate and has been in the adopted development plan for many years. It has never resulted in confusion regarding the target for housing delivery. It has not prevented the housing targets in the adopted plan from being exceeded, as per paragraphs 1.11 to 1.13 of WCC's Hearings Statement for Matter 3.</p> <p>Disagree with proposed reduction in delivery within the South Downs National Park (SDNP). The Council has set out what it considers likely to be delivered in the SDNP in the Statement of Common Ground with the SDNPA, which has resulted in a figure of 312 homes for the period 2024-2040. Amending this to 280 dwellings on the basis of delivery trends over the past four years is not considered a robust approach.</p> <p>Comments regarding the standard methodology and unmet needs are noted. No amendment is suggested.</p> <p>The Council considers that, for the purposes of plan-making, It is not necessary to include a 'buffer' to allow for non-delivery, especially given the high levels of housing provision expected in the early years of the Plan period for the reasons set out in para. 9.20 of the Regulation 19 Plan (SD01).</p> <p>The Council considers that following the adoption of this Plan is can demonstrate a five year supply of homes with a 20% buffer from 1 July this year. the revised housing trajectory does show housing delivery falling after 2032, but at no point will the cumulative delivery fall into shortfall, and the target for each year is exceeded until 2034. This is considered a sound position with sufficient time for a review of the Local Plan to be undertaken in accordance with MM6.</p>

	<p>In summary, the Council considers that it can commit to providing 150 homes for Portsmouth and 345 homes for Havant in this Local Plan as per the Statements of Common Ground with those authorities.</p> <p>Regarding Appendix A Housing Table Figures (ED42b), it is accepted that the housing requirement for the plan area is 10,999 dwellings, which is equivalent to 687 dwellings per annum. Because the Winchester Plan area only covers that part of the district which falls outside the South Downs National Park, the Plan sets out how the Local Housing Need using the standard method for Winchester District will be met, proposals for housing delivery within the Winchester Plan area and an anticipated housing delivery within the South Downs National Park. It is considered that this bespoke approach is warranted by the circumstances and is best reflected in the proposed housing trajectory set out document ED42b - i.e. to show delivery against the Local Housing Need rather than the Plan area requirement. This approach is considered to be in accordance with para. 75 of the December 2023 NPPF. However, it would improve the clarity of this approach if reference to "housing requirement" in the Trajectory was replaced with reference to "housing need". This would not change the position regarding the councils obligations for monitoring housing delivery against the plan housing requirement under the proposed monitoring framework.</p> <p>The respondent maintains their concerns regarding the anticipated delivery of sites. The Council's position on site delivery is set out in paragraphs 1.79 to 1.97 and Appendix A of the Council's Hearings Statement for Matter 4, the Housing Topic Paper Update (ED02), and the Authorities Monitoring Report 2023-2024 Appendices (ED03b).</p> <p>The respondent does not suggest their position warrants that the Plan be found unsound, but seeks a comment in the Inspector's report regarding the "fragility of supply". It will be for the Inspector to decide what to include in her report, but the Council would note that the purpose of forthcoming report is to consider the soundness of the Plan, and in any event the ongoing housing supply position will be subject to ongoing monitoring and testing through the development management process.</p>
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-10
Representation Summary	<p>Support re-basing of the housing requirement to a base-date of 1st April 2024.</p> <p>Concern Table H2 refers to 11,311 homes and the policy refers to "about 11,000". States Policy H2 should state "at least 11,000".</p> <p>Consider anticipated delivery in SDNP should be reduced to 280 dwellings in line with recent windfall in the Park.</p> <p>Reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need.</p> <p>Concern that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan.</p>

	<p>Notes the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, and states the trajectory shows a drop in delivery post 2032. Considers the plan has no contingency and is unsound.</p> <p>Considers the Plan cannot commit to providing homes for Portsmouth and Havant given other factors. and has not met the NPPF requirement for effective cooperation.</p> <p>Comments on Appendix A (Housing Table Figures (ED42b).</p> <p>Requirement of 676dpa is incorrect - should be 688 based upon a requirement of 11,000 2024-2040.</p> <p>States a buffer of 5% is required for the five-year period, and notes that from July 2026 a 20% buffer will be required for decision-making purposes. This will result in a fragile supply position against the requirement.</p> <p>Considers housing supply was not fully explored, but maintains the following concerns with the 5 year period as at 1 April 2025. The reductions sought cumulatively total 498 dwelling, leaving the 5 year supply position in shortfall.</p> <ol style="list-style-type: none"> 1. 14 Chesil Street. Permission has lapsed and site is now is not available. 2. Whitely Green has been allocated for a number of years and does not have planning permission. 3. Land off Tanners Lane, Denmead, is included for 18 homes, yet an application for 11 homes was refused and remains subject to appeal (as yet undetermined). 4. Barton Farm. Increased delivery rates are unsupported. 5. Station Approach is an active car park and is not therefore available. 6. CWR fails to meet the definition of deliverable. 7. Other sites within the trajectory (North Whiteley additional, Cornerways and Merrydale and Land at the Lakes) should not be included in the five-year supply 8. Ravenswood is not justified to deliver 100 homes in one year. <p>Whilst for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best. It would be helpful if the Inspector report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim fully support the re-basing of the housing requirement to a base-date of 1st April 2024. However, Table H2 and Policy H1 both misalign continue to present a negative, inflexible, and ineffective approach to addressing needs.</p> <p>The misalignment manifests from the clear contention that the District Housing requirement is 11,311 homes in supporting Table H2, yet the Policy Provision (as modified) is only 'about 11,000'. The Plan must identify a clear Policy</p>

Requirement, expressed as a minimum, addressing the need. Such unambiguity is required in order to monitor the effectiveness of the policy, including in relation to the rolling housing land supply. For reasons of soundness, including to provide consistency with the requirements of the NPPF (2023 version paras 11 b) and 16 c)), Policy H1 must be expressed as follows:

'...Housing will be permitted to provide for the scale, types and tenures of housing needed in the Local Plan area over the Plan period (2020-2040), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of at least 11,000 dwellings (net) in this period (excluding the South Downs National Park area),...'

Notwithstanding the above, we note the Inspector's interim comments on the South Downs National Park Authority Allowance and would highlight that the 350 dwelling 'contribution' was previously split over a plan period of 20-years (17.5 dpa). Not only did the Park Authority consider an allowance of 250 homes to be more realistic, but the evidence is that over the first four-years of the plan period only 38 homes (350 – 312) have been secured within the National Park (9.5 dpa). As such, and given the buffer that does exist, albeit significantly limited, which the Inspectors expressly note can be called on to address any shortfall in provision from the National Park, the figures in Table H2 should be further modified as follows. This modification shows an annual provision of 17.5 homes in the National Park across the remaining 16 year housing-provision period, to better reflect the evidence base and be justified:

Unmet Needs Allowance (for	463
	Outstanding planning
	5,186 unmet need in neighbouring
	permissions
authorities	
	Other commitments 579
	Windfall development
	1,49
	5 SDNP completions,
	permissions and windfall280

Again, notwithstanding the above and acknowledging the Inspector's interim comments, we would highlight the following.

Firstly, any contribution towards needs across the sub-region (PfSH area) in the period prior to 1st April 2024 relative to the district requirement, as calculated according to the SM LHN, would be reflected in the updated SM LHN at 1st April 2024, taking into account affordability ratios. The scale of unmet need can only be considered at a point in time, all base-dated at 1st April 2024. Previous provision is already accounted for in the SM calculation. Hence, reliance on provision pre 1st April 2024 provides no justification to minimise the planned future contribution to unmet need, the scale of which is significant (as set out in previous representations by tor&co and the HBF).

Secondly, it is concerning that all of the 'buffer' is attributed to unmet needs. The NPPF (2023 version para 86 d)) requires plans to be flexible enough to accommodate needs not anticipated in the plan. Accepting the plan only

'anticipates' meeting the LHN according to the now superseded methodology, the requirement and associated supply provides no flexibility and remains inconsistent with the NPPF.

This inflexibility is particularly concerning noting the requirement for Winchester Council to demonstrate a five-year supply of homes with a 20% buffer from 1st July this year, for the purposes of decision-making. The Local Plan Housing Trajectory (MM50) highlights the concern, in an acute drop in delivery post 2032 (from the five-year period base-dated 1st April 2028). The plan has no contingency in this respect and remains unsound.

In short, the minimal buffer in provision of 495 homes (just 4.5% of the overall requirement and equivalent to 31 dpa) is heavily leaned upon to address:

- a) shortfalls in the South Downs National Park,
- b) increased annual requirements (+20%) for each rolling five year period until a new plan is in place,
- c) unmet need from neighbouring authorities, and
- d) and shortfall in delivery across the district more generally.

In this context, the plan cannot purport to commit to providing 150 homes for Portsmouth and 345 homes for Havant. It is clear that the modifications made, including the footnotes to Table H2, are unsupported by the evidence, scale of housing requirement, together with associated allocations made in the plan.

Irrespective of the Government's position on the Duty to Cooperate, the NPPF expects effective cooperation and for unmet needs to be accommodated '*where it is practical to do so*' (NPPF 2023 para 35 a)). The plan as proposed to be modified, and its associated evidence base, fails to meet this requirement and is not positively prepared.

The plan has not been positively prepared, and the modifications proposed now further highlight the inadequacies.

Comments are also invited under MM49 with respect to the supporting evidence, including housing table figures (Appendix A for Main Mods). First it is notable that the 'requirement' is identified as 676 dpa. However the updated requirement (within Winchester District and excluding the South Downs National Park) of 11,000 homes across the 16 year period 2024 – 2040 amounts to a basic requirement of 688 dpa.

For the five-year period a 5% buffer is required, increasing the annual requirement to 723 dpa and presenting an overall requirement of 3,612 homes. Added to this is the requirement from 2024/25, of 688 homes (without buffer) to correspond to the supply figures, presenting a requirement of 4,300 homes. Whilst for the purposes of decision-making only it remains relevant to note that as of 1st July 2026 a 20% buffer will be required, which will present a five-year requirement of 4,128 homes (or 4,816 from 2024).

The current cumulative supply for the current five year period, but also including the year 2024/25 is 5,302 homes, highlighting a fragile position against the requirement (5302 – 4816, which is only 486 in excess).

Because of the lack of a clear and up to date housing trajectory at the time of the hearings, housing land supply was not fully explored. However, Blenheim has previously commented in detail on a number of the delivery assumptions made by Winchester Council. For example, the following concerns are maintained with respect to the current five-year period, base-dated at 1st April 2025:

	<p>1) 14 Chesil Street Winchester is included in the supply for 13 homes, involving the demolition of the property adjacent to an existing theatre. However it is our understanding that the consent has lapsed and has since been superseded by plans to extend the Theatre. This site should be removed from the trajectory.</p> <p>2) Whiteley Green remains in the trajectory for delivery of 30 homes with the five-year period, yet it has been allocated (under the existing Local Plan Part 2) for a number of years and does not have planning permission. The history and site status fails to support the test of the site being 'deliverable'.</p> <p>3) Land off Tanners Lane, Denmead, is included for 18 homes, yet an application for 11 homes was refused and remains subject to appeal (as yet undetermined).</p> <p>4) Barton Farm features in the trajectory for the delivery of 115 dpa, yet only one developer plus Registered Provider is involved and delivery rates between 2017 and 2023/24 have been at 85 dpa. Increased delivery rates are unsupported, reducing the supply by 150 homes.</p> <p>5) Station Approach features in the trajectory for 35 homes, yet it is an active car park and is not therefore available.</p> <p>6) The Central Regeneration Area features in the trajectory for 50 homes, and it is understood that a hybrid planning application may be submitted this year, but at the present time with application lead in times and the need for site clearance etc this site fails to meet the definition of deliverable.</p> <p>7) Other sites within the trajectory but for which sufficient progress has been made (North Whiteley additional, Cornerways and Merrydale and Land at the Lakes) should not be included in the five-year supply, amounting to 152 homes.</p> <p>8) Finally, it is unclear as to why the Ravenswood site would deliver 100 homes in a single year, whilst only delivering 50 / 30 / 20 homes in other years. A reduction to 50 homes (from 100) in 2029/30 would be appropriate.</p> <p>The above supports the deletion of circa 498 homes from the supply, reducing it to 4,804 homes from 2024 (looking at the current five-year period but taking into supply from 2024/25). The position will be in shortfall.</p> <p>Whilst, for plan-making purposes, we do not consider the position to warrant a conclusion of unsoundness, it is clear that the five-year position is marginal at best, indicating that the five-year position cannot be carried forward with any confidence and is subject to challenge for decision-making purposes, particularly from July this year. The position is further exacerbated if the approach is taken that any over-supply from 2024/25 should not be accounted for in the current five-year period (including in the context of the new SM LHN), in which case the supply would be in further shortfall.</p> <p>In conclusion, it would be helpful if the Inspector report acknowledges this position, i.e. the fragility of the supply position going forward, which in any event further highlights the need to progress with the review local plan rapidly and under a clear timetable.</p>
<p>Officer Response</p>	<p>Table H2 sets out the total housing development anticipated to come forward in Winchester District over the period 2024-2040. Policy H1 sets out the housing provision in the Winchester Plan area. Therefore they fulfil different purposes and set out different</p>

information. It is considered the supporting text (including paragraph 9.20) makes this clear. It is not considered necessary or appropriate for the wording in the Local Plan to be changed.

Disagree with the proposed change to Policy H1 - to replace "about" with "at least". This issue was discussed in the examination hearings in relation to Policy SP2. The wording is considered appropriate and has been in the adopted development plan for many years. It has never resulted in confusion regarding the target for housing delivery. It has not prevented the housing targets in the adopted plan from being exceeded, as per paragraphs 1.11 to 1.13 of WCC's Hearings Statement for Matter 3.

Disagree with proposed reduction in delivery within the South Downs National Park (SDNP). The Council has set out what it considers likely to be delivered in the SDNP in the Statement of Common Ground with the SDNPA, which has resulted in a figure of 312 homes for the period 2024-2040. Amending this to 280 dwellings on the basis of delivery trends over the past four years is not considered a robust approach.

Comments regarding the standard methodology and unmet needs are noted. No amendment is suggested.

The Council considers that, for the purposes of plan-making, It is not necessary to include a 'buffer' to allow for non-delivery, especially given the high levels of housing provision expected in the early years of the Plan period for the reasons set out in para. 9.20 of the Regulation 19 Plan (SD01).

The Council considers that following the adoption of this Plan is can demonstrate a five year supply of homes with a 20% buffer from 1 July this year. the revised housing trajectory does show housing delivery falling after 2032, but at no point will the cumulative delivery fall into shortfall, and the target for each year is exceeded until 2034. This is considered a sound position with sufficient time for a review of the Local Plan to be undertaken in accordance with MM6.

In summary, the Council considers that it can commit to providing 150 homes for Portsmouth and 345 homes for Havant in this Local Plan as per the Statements of Common Ground with those authorities.

Regarding Appendix A Housing Table Figures (ED42b), it is accepted that the housing requirement for the plan area is 10,999 dwellings, which is equivalent to 687 dwellings per annum. Because the Winchester Plan area only covers that part of the district which falls outside the South Downs National Park, the Plan sets out how the Local Housing Need using the standard method for Winchester District will be met, proposals for housing delivery within the Winchester Plan area and an anticipated housing delivery within the South Downs National Park. It is considered that this bespoke approach is warranted by the circumstances and is best reflected in the proposed housing trajectory set out document ED42b - i.e. to show delivery against the Local Housing Need rather than the Plan area requirement. This approach is considered to be in accordance with para. 75 of the December 2023 NPPF. However, it would improve the clarity of this approach if reference to "housing requirement" in the Trajectory was replaced with reference to "housing need". This would not change the position regarding the councils obligations for monitoring housing delivery against the plan housing requirement under the proposed monitoring framework.

The respondent maintains their concerns regarding the anticipated delivery of sites. The Council's position on site delivery is set out in paragraphs 1.79 to 1.97 and Appendix A of the Council's Hearings Statement for Matter 4, the Housing Topic Paper Update (ED02), and the Authorities Monitoring Report 2023-2024 Appendices (ED03b).

The respondent does not suggest their position warrants that the Plan be found unsound, but seeks a comment in the Inspector's report regarding the "fragility of supply". It will be for the Inspector to decide what to include in her report, but the Council would note

	that the purpose of forthcoming report is to consider the soundness of the Plan, and in any event the ongoing housing supply position will be subject to ongoing monitoring and testing through the development management process.
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MM2040 45 - Havant Borough Council

Name	David Hayward
Representor Number	MM2040 45
Representation Number	MM2040 45-2
Representation Summary	<p>Havant BC acknowledges that the apportionment of unmet needs allowance was agreed based upon the figure of 1,900 dwellings whilst cognisant of the fact that it could change in the course of the examination.</p> <p>Havant Borough Council currently has an unmet Housing need of 10,650 dwellings identified in its draft Local Plan. It is broadly positive therefore, that the Winchester District Local Plan makes provision for accommodating a proportion of both Havant Borough and Portsmouth City's unmet housing need.</p> <p>The Borough Council has been working with its neighbours in South East Hampshire, namely Portsmouth, Gosport and Havant Borough Councils, to identify the level of unmet housing and employment need. Appendices to this response set out correspondence and supporting materials relating to the land supply position.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM49 - Housing</p> <p>Policy H1 of the Submission Winchester Local Plan (Regulation 19) included an unmet needs allowance of 1,900 dwellings as a contribution towards the unmet needs of neighboring areas in South Hampshire. This has been reduced to 495 dwellings through the examination process to date. Our two Councils agreed in the SoCG of October 20241 (in partnership with Portsmouth City Council) a distribution of any unmet needs allowance from Winchester District as follows:</p> <ul style="list-style-type: none"> • 30% apportionment of the unmet need housing allowance in the Winchester District Local Plan to Portsmouth City Council; and • 70% apportionment of the unmet need housing allowance in the Winchester District Local Plan to Havant Borough Council. <p>This apportionment was agreed based upon the 1,900 figures from the submitted local Plan whilst cognisant of the fact that it could change in the course of the examination. Havant Borough Council has an unmet need of 10,650 dwellings, set out in paragraph 2.83 of our Draft Local Plan which was consulted on earlier this year.</p>

	<p>Policy H1 as has been revised through the proposed main modification MM49 results in a reduction in the unmet need allowance of 495 homes, equating to approximately 150 homes for Portsmouth City Council and 345 homes for Havant Borough Council.</p> <p>It is broadly positive therefore, that the Winchester District Local Plan makes provision for accommodating a proportion of both Havant Borough and Portsmouth City’s unmet housing need. Whilst this contribution by no means accommodates the full unmet need, it is a positive step in addressing it. The full extent of unmet housing need in Portsmouth, Gosport and Havant is set out below.</p> <p>These updated figures are also referenced in the proposed main modifications MM6 and MM50. The Borough Council notes therefore the reduction in the unmet need allowance being provided to The Borough Council and Portsmouth City Council to 495 homes as referenced in these policies.</p> <p>The Borough Council has been working with its neighbors in South East Hampshire namely Gosport Borough Council and Portsmouth City Council to identify the level of unmet housing and employment need. This was set out by the authorities in a letter to Winchester City Council in October 2025 concluding that the authorities had a housing shortfall of 18,347 dwellings in total. Winchester City Council acknowledged the letter in November 2025. The South East Hampshire Authorities met with WCC (as well as East Hampshire District Council and Fareham Borough Council) in October 20205 to present their land supply position (a note of this meeting forms appendix 3). Copies of the meeting material and correspondence form an annex to this letter.</p> <p>Havant BC Annex - meeting material and copies of correspondence Redacted.pdf, Havant BC reps on Winchester District Local Plan Main Mods.pdf</p>
<p>Officer Response</p>	<p>The comments are noted. No change to the Modification have been sought by Havant Borough Council and none is considered necessary.</p> <p>WCC is engaged in ongoing correspondence with Portsmouth, Havant, Gosport councils and more recently with the South Downs National Park regarding unmet needs in South East Hampshire which will inform the next Local Plan.</p>

MM2040 48 - Bewley Homes

<p>Name</p>	<p>Mr Sam Roach</p>
<p>Representor Number</p>	<p>MM2040 48</p>
<p>Representation Number</p>	<p>MM2040 48-2</p>
<p>Representation Summary</p>	<p>The reduction in housing provision is premature and risks under-providing for objectively assessed housing needs across the wider housing market area. The Main Modifications are inadequate to resolve this issue and the Local Plan should return to earlier stages of the plan process to allocate more sites (of which there are many sustainable locations) to meet this unmet need.</p>

	<p>We recommend that the housing requirement policies are amended to clearly distinguish between minimum housing provision and the level of provision required to respond to strategic unmet needs. Further, the plan should include a mechanism to review or uplift housing numbers within the plan period should evidence demonstrate a worsening shortfall elsewhere in the housing market area.</p> <p>Without revisions to this end, the revised housing requirement risks embedding under-delivery and reducing the Plan's ability to respond to the inevitable changing housing pressures in the area.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>After reviewing the representation, which was previously attributed to MM1 (Foreword), officers have determined that it more appropriately relates to MM49 and have therefore moved the comment accordingly.</p> <p><u>Reduction of Housing Need through the Standard Method</u></p> <p>We are concerned about the reduction in the overall housing requirement as proposed through the application of the revised standard method. In our view, the approach taken through the Main Modifications does not adequately consider or justify the implications of cross-boundary housing need, such as South Hampshire.</p> <p>While the standard method provides a housing need baseline, national policy is clear that this figure should be tested against wider strategic considerations, including functional housing market areas and unmet needs arising in neighbouring authorities. Currently the approach is that given that the Local Housing Need figure has been reduced and there is an oversupply of 290 homes above this figure, this will be sufficient to address the unmet needs of the adjoining authorities, including South Downs National Park and PUSH authorities. However, there has been no examination of whether this figure is sufficient, at no point, is the total level of unmet need for South Downs and PUSH identified.</p> <p>The likely level of need as identified in our previous representations is likely to run in to the thousands. Furthermore, the Local Plan leaves matters of cross-boundary need to be resolved with the emerging Position Statements of the PUSH authorities on the horizon.</p> <p>The Main Modifications do not demonstrate that unmet housing need arising elsewhere in South Hampshire has been fully explored, quantified or addressed. As such, the conclusion that no additional provision is required to accommodate cross-boundary need is not supported by sufficiently robust evidence. In our view, the Local Plan is not in accordance with the requirements to work proactively on cross-boundary need within the National Planning Policy Framework and is therefore unsound as it is not justified or supported by national policy.</p>

	<p>In this context, we consider that the reduction in housing provision is premature and risks under-providing for objectively assessed housing needs across the wider housing market area. The Main Modifications are inadequate to resolve this issue and the Local Plan should return to earlier stages of the plan process to allocate more sites (of which there are many sustainable locations) to meet this unmet need.</p> <p><u>Revised Housing Requirement Policies from 2024 Onwards</u></p> <p>We suggest that the revised housing requirement policies relating to delivery from 2024 onwards require further amendment and clarification.</p> <p>The Main Modifications introduce a revised housing trajectory which significantly lowers future delivery expectations, yet there is limited explanation as to how this revised requirement will maintain flexibility, resilience and responsiveness to changing circumstances. There is insufficient clarity as to how delivery will be monitored and adjusted should housing delivery fall below expectations or should unmet needs from neighbouring authorities crystallise during the plan period.</p> <p>We recommend that the housing requirement policies are amended to clearly distinguish between minimum housing provision and the level of provision required to respond to strategic unmet needs. Further, the plan should include a mechanism to review or uplift housing numbers within the plan period should evidence demonstrate a worsening shortfall elsewhere in the housing market area.</p> <p>Without revisions to this end, the revised housing requirement risks embedding under-delivery and reducing the Plan’s ability to respond to the inevitable changing housing pressures in the area. The Main Modifications are inadequate to address this point and the Local Plan is unsound, because it is not justified against the Tests of Soundness.</p> <p>Supporting Information</p> <p>1. Winchester Main Modifications - Reps - Sam Roach.pdf</p>
<p>Officer Response</p>	<p>The changes in this modification arise from aligning the Plan’s housing requirement with the latest calculation of Local Housing Need (2024) and other updates set out in Winchester Local Plan Examination Housing Numbers and Sites Update (ED42a). There is no overall reduction proposed in the number of homes built to 2040.</p> <p>It is considered that the Local Plan has considered unmet needs in the wider area and responded appropriately throughout the Plan-making process, as set out in section 4 of the Housing Topic Paper Update (ED02) and paras. 1.17 to 1.22 WCC's Hearings Statement for Matter 4.</p> <p>The objection raises no new matters not already considered. The suggested revisions are not considered appropriate, and in any event the stated aims (to prevent embedding under-delivery) are better addressed by the commitment to an early Plan review set out in MM6.</p> <p>Disagree with proposed changes.</p>

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-8
Representation Summary	<p>Support the use of Local Housing Need as starting point, but disputes the total planned housing provision due to concerns over unmet need, affordability and distribution strategy.</p> <p>Considers the development strategy remains over reliant on existing commitments which does not boost the supply of housing in line with the NPPF.</p> <p>Considers the reduction in unmet needs allowance is a substantive change not accepted or agreed with PCC and HBC and is wholly inadequate and that the Council has not met the Duty to Cooperate.</p> <p>Concern that housing affordability ratio remains relatively high in Winchester.</p> <p>Considers the spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth.</p> <p>Overall considers the Plan should have much higher levels of housing development and as a minimum allocate a further 1,405 dwellings to retain an unmet needs allowance of 1,900 homes. Considers that Manor Parks presents the optimal site to deliver up to 1,200 of these dwellings in a location which would assist in a more appropriate spatial strategy distribution.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bloor welcomes the use of the current Local Housing Need ('LHN') (based on the 2023/NPPF) as the starting point for calculating growth (676 dwellings per annum ('dpa') or 10,816 for the period 2024-2040), in accordance with PPG para.2a-005. However dispute the total planning housing provision (11,311 dwellings) due to the extensive sub-regional unmet need and acute affordability crisis, and the spatial distribution strategy.</p> <p>Total District Housing Provision</p> <p>2.13 Bloor support the amended period (2024-2040 opposed to 2020-2040) used to calculate housing need. The removal of the years 2020-2023 to some extent diminishes the reliance on completions and outstanding planning permission. Noting this, c. 59% (previously c. 69%) of the total housing provision is still noted to come from (a) completions (834 dwellings (previously 3,170 dwellings)), (b) outstanding planning permissions (5,186 dwellings (previously 6,780 dwellings)) and (c) other commitments (579 dwellings (previously 745 dwellings)) which Bloor still do not believe aligns with the Government commitment to boosting the supply of housing, and cannot be considered effective, justified or consistent with the NPPF.</p> <p>Unmet Need</p>

2.14 The effect of recalibrating the plan-period almost entirely removes the agreed unmet need contribution (to 495 (previously 1,900)) made by the 2040 plan to address the unmet needs of neighbouring authorities. MM49 recognises that 30% of the unmet need allowance would be apportioned to Portsmouth City Council ('PCC') and 70% would be apportioned to Havant Borough Council ('HBC'). These percentages were agreed in the respective Statements of Common Ground ('SoCG') (SD08e/Havant and SD08i/Portsmouth. The reduction of the unmet need contribution to 495 results in the Councils respectively receiving 150 dwellings and 345 dwellings from WCC opposed to 570 dwellings and 1,330 dwellings. Bloor express that this is a substantive change and the Council have provided no evidence that this has been accepted or agreed with PCC and HBC.

2.15 Bloor consider that the provision of just 495 dwellings is wholly inadequate given the fact that the unmet need in the Partnership for South Hampshire ('PFSH') is estimated to be 41,526 dwellings for the period 2024-2036 (as evidenced in our Matter 1 - Procedural and Legald Requirements and Matter 4 - Meeting Housing Need Hearing Statement).

2.16 Furthermore, Bloor note that as detailed within our Winchester EiP Plan Period Comment Letter (Responding to Inspector Note 15), this significant reduction in the provision of unmet needs essentially demonstrates that the Council were in effect using the surplus in the number of homes already in 2020 to 2024 to meet the future needs of PCC and HBC. The Council cannot be considered to comply with the Duty to Cooperate and as per section.33A of the 2004 Act this cannot be rectified after the Plan has been submitted for Examination.

Affordability

2.17 Bloor express that Winchester is amongst the UK's least affordable housing markets, with prices well above regional averages. In 2024, the affordability ratio was 12.06; within the top quartile nationally and is in the highest 20 authorities outside of London. In comparison, the average 2024 affordability ratio for Hampshire and the South East was 9.6 and for England was 7.71.

2.18 In Winchester, housing has become increasingly unaffordable as demonstrated in Figure 1 (shown in black). The affordability ratio (median house price to median workplace-based earnings) increased from 5.2 in 1997 to 9.9 in 2012 to 13.8 in 2021. Although there were minor improvements in the affordability ratio in the last three years, this has been a period when mortgage rates have increased significantly, house prices have still risen in Winchester and Winchester still remains significantly more unaffordable than in Hampshire (shown in orange), the South East (shown in green) and England (shown in purple). The gap between Winchester and the other areas has increased over time, which shows it has disproportionately become more unaffordable than the county, regional and national average. In 2012, the affordability ratio in Winchester was 1.9 more than Hampshire and 3.1 more than England, whereas in 2024 it was 2.5 more than Hampshire and 4.3 more than England.

2.19 With challenging housing market conditions, house prices in Winchester have fallen slightly in the last year, in a reflection of broad trends recorded across the wider county, regional and national average in recent years.

Spatial Strategy

	<p>2.20 Policy H1 as amended distributes development between the three spatial areas as follows: (a) Winchester Town - 4,445 dwellings / 40% (previously 5,640 dwellings / 36%), (b) South Hampshire Urban Area – 3,880 dwellings / 36% (previously 5,650 dwellings / 37%) and (c) Market Towns and Rural Areas – 2,675 dwellings / 24% (previously 3,825 dwellings / 25%).</p> <p>2.21 Bloor’s objection remains that, as per our Matter 2 - Spatial Strategy Distribution of Development Hearing Statement, that the spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan’s own Integrated Impact Assessment (‘IIA’) criteria and conflicts with both current and emerging national planning policy, raising significant questions about the R19 LP’s soundness. Furthermore, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision.</p> <p>Conclusion: Proposed Amend</p> <p>2.22 Bloor consider that optimally to address the extensive sub-regional unmet need and acute affordability crisis the Council should be proactively planning above the 2023/NPPF LHN (676dpa) and for the 2024/NPPF LHN (1,144 dpa or 18,304 dwellings across the Plan period). To achieve this the Council would need to allocate sites to deliver an additional 6,973 dwellings.</p> <p>2.23 Noting this, Bloor consider that as an absolute minimum WCC should be planning for 12,716 dwellings (standard method need 2024-2040 (10,816 dwellings) and unmet needs allowance (1,900 dwellings)) in order for the eLP to be found legally compliant and sound. As such the Council would need to allocate sites to deliver an additional 1,405 dwellings. Bloor express that Manor Parks presents the optimal site to deliver up to 1,200 of these dwellings in a location which would assist in a more appropriate spatial strategy distribution. Existing allocations in the South Hampshire Urban Area would then be available to contribute towards the unmet needs allowance.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations_Redacted.pdf</p>
<p>Officer Response</p>	<p>It is considered that the Local Plan has considered unmet needs in the wider area and responded appropriately throughout the Plan-making process, as set out in section 4 of the Housing Topic Paper Update (ED02) and paras. 1.17 to 1.22 WCC’s Hearings Statement for Matter 4.</p> <p>The Statements of Common Ground With Portsmouth City Council and Havant Borough Council (SD08i and SD08e) both recognise that the contribution to unmet housing needs may change may change in the course of the Local Plan Examination.</p> <p>The justification for the development strategy is set out in the Development Strategy and Site Selection Topic Paper (SD10b) and it is not considered that the proposed change is necessary.</p> <p>Disagree with proposed changes.</p>

MM50 (Policy H2)

MM2040 1 - Mr Robert Watters

Name	Mr Robert Watters
Representor Number	MM2040 1
Representation Number	MM2040 1-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Affordable housing in the are is not being completed at a suitable rate, and therefore these needs are not being met. On Kings Barton, it is clear that the 'affordable' housing, as purchased by Homegroup and Vivid for residents is anything but, with average wages unable to match high rents. Also, CALA should be made to build these at a faster rate, and if Winchester are serious about providing housing for the needs of families, stop making the majority of this housing apartments and flats and try getting some actual houses for families with gardens and parking and a decent standard of living at a reasonable price. All of the new developments should make this priority and not kowtow to the demands of the building companies who are putting profit over the needs of residents. WCC have a duty of care to local residents. The majority of housing in Kings Barton is unaffordable on national average wages, and I am sure that the new developments will follow suit.</p>
Officer Response	<p>These general comments do not directly respond to the proposed modification. Plan policy H5 will guide the type of dwellings being delivered on sites. Comments on the affordability of homes are noted. Policy H6 will secure affordable housing in line with national policy and guidance, which has limited the scope for more affordable dwellings to be secured.</p>

MM2040 7 - Mr Tom Hutchinson

Name	Mr Tom Hutchinson
Representor Number	MM2040 7
Representation Number	MM2040 7-1

Representation Summary	<p>Supports deletion of phasing restriction but considers MM50 should go further and include a statement in the supporting text to H2 that new housing allocations made through the Denmead Neighbourhood Plan can be delivered at any point during the plan period, and that the Neighbourhood Plan is encouraged to allocate land for additional dwellings where this is supported by local evidence of need and where environmental constraints can be addressed</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The deletion of the phasing restriction on development in Denmead (previously Policy H2 criterion 3) is supported. This change removes the arbitrary constraint that restricted delivery of new housing in Denmead to post-2030. It allows development to come forward in a more responsive and plan-led manner, subject to planning permission and necessary mitigation, particularly for nutrient neutrality.</p> <p>However, MM50 does not go far enough to clarify the implications of this policy change for the Denmead Neighbourhood Plan. When read in conjunction with MM97 and MM98, the deletion of phasing reinforces the need for Denmead to allocate a minimum of 100 dwellings but also enables and encourages the Neighbourhood Plan to identify additional land for housing where it is justified by local evidence and capable of being delivered sustainably.</p> <p>This should be made explicit in Policy H2 or its supporting text to ensure a clear and coherent policy framework across the Local Plan and neighbourhood tier. Without this clarity, there is a risk that the removal of phasing is misunderstood as merely facilitating delivery of a capped number of homes, rather than unlocking the potential for sustainable growth consistent with local ambition and national policy.</p> <p>Requested changes:</p> <p>Amend the supporting text to Policy H2 to insert the following clarification (after paragraph 3.6 or other appropriate location):</p> <p>“Following the removal of phasing for Denmead, new housing allocations made through the Denmead Neighbourhood Plan can be delivered at any point during the plan period. The Local Plan sets a minimum requirement of 100 dwellings, and the Neighbourhood Plan is encouraged to allocate land for additional dwellings where this is supported by local evidence of need and where environmental constraints can be addressed.”</p> <p>Justification:</p> <ul style="list-style-type: none"> · Ensures the implications of removing phasing are fully and clearly articulated; · Reinforces the positive and flexible role of the Neighbourhood Plan in shaping local growth; · Avoids misinterpretation that 100 dwellings is a cap or limit;

	<ul style="list-style-type: none"> Aligns with the revised policy wording proposed under MM97 and MM98; Supports soundness by ensuring clarity, effectiveness, and consistency with NPPF para 29 and para 11c.
Officer Response	<p>Disagree with suggested additional wording.</p> <p>MM50 removes reference to phasing and it is unnecessary (and potentially confusing) to state that development under allocation DEN1 can come forward at any time.</p> <p>The Council considers that it is appropriate for allocations to be expressed as "about" not a "minimum", though this is not a cap. The rationale for this is set out in paras. 1.11 to 1.13 of the Council's Hearings Statement for Matter 3.</p>

MM2040 19 - Mandy Owen

Name	Mandy Owen
Representor Number	MM2040 19
Representation Number	MM2040 19-3
Representation Summary	<p>Support deletion of Policy H2.</p> <p>Express concerns that housing trajectory relies on extant permissions and allocations, and an anticipated reduction in delivery after 2034/35 to below 676 dpa. Considers this demonstrates the need to allocate additional new sites.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM50 (Policy H2)</p> <p>2.18 Vistry supports the deletion of the 'brownfield first' policy which they highlighted in earlier representations was not a sound approach to plan making.</p> <p>2.19 This MM confirms that a detailed trajectory supports the Plan. Nonetheless, Vistry still have concerns over the trajectory, with the huge reliance of the Plan on extant planning permissions and sites which already benefit from an allocation. Some of these sites have been allocated since 2013 and are yet to come forward. However, the Plan is predicated on them being deliverable in accordance with the trajectory. This reliance also results in significant levels of completions in the early part of the Plan with limited completion in the second half of the Plan's period.</p> <p>2.20 Indeed, completions after 2034/2035 would fall below 676dpa and the Council would not be able to maintain a five-year housing land supply. This demonstrates the need to allocate additional new sites in order to prepare a plan which actually intends to maintain a minimum housing land supply throughout the Plan Period.</p>

	Main Mods representations o b o Vistry.pdf
Officer Response	<p>The revised housing trajectory does show housing delivery falling after 2032, but at no point will the cumulative delivery fall into shortfall, and the target for each year is exceeded until 2034. This is considered a sound position with sufficient time for a review of the Local Plan to be undertaken in accordance with MM6.</p> <p>Disagree with proposal to allocate additional new sites in he Plan.</p>

MM2040 22 - South Downs National Park Authority (SDNPA)

Name	Mr Lewis Ford
Representor Number	MM2040 22
Representation Number	MM2040 22-2
Representation Summary	<p>Objection refers to comments made by SDNPA to MM49, which are summarised as follows -</p> <p>Object to amount of housing expected to come forward in South Downs National Park (SDNP). A Reg 19 Plan will be published in February setting out proposals for 245 homes in the SDNP between 2024/25 and 2039/40.</p> <p>Proposes SDNP figure should be revised from 312 to 245 homes, with consequential reduction in the unmet needs allowance from 495 to 428 dwellings.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Due to above, proposed main modifications to Paragraph 9.22 should be amended to:</p> <ul style="list-style-type: none"> The total provision of about 11,245 dwellings includes about 245 dwellings that will be provided within the National Park part of the district, which will come forward through the adopted South Downs Local Plan (which covers the period to 2033) and its emerging review (which will cover the period up to 2042). <p>Supporting Information</p> <ol style="list-style-type: none"> 260113 - SDNPA representation_Redacted.pdf
Officer Response	Disagree with proposed revisions for reasons set out in response to SDNPA objections to MM49.

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-9
Representation Summary	<p>Support deletion of Policy H2.</p> <p>Considers para. 9.22 should reduce the contribution from SDNP to 280 homes in accordance with representation to MM49.</p> <p>Considers the assessment of the contribution small sites make to the overall supply in para. 9.25 is not supported as it relies on windfall.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim supports the deletion of Policy H2.</p> <p>With reference to paragraph 9.22, and as set out under Blenheim’s response to MM49, the figure identified for provision in the South Downs National Park should be revised to 280 homes to take account of the re-based housing requirement/provision period.</p> <p>With reference to paragraph 9.25, the reliance on windfall sites to meet NPPF requirements around the provision of medium and small sized sites is not supported.</p> <p>Windfalls are ‘unidentified’ whereas the NPPF requires sites to be identified and/or on brownfield registered. The plan should be transparent that the requirement is not met.</p>
Officer Response	<p>Support of the deletion of Policy H2 noted.</p> <p>Do not agree that the figure for anticipated delivery in SDNP should be revised to 280 in line with recent trends. This is not considered a robust approach. The number of dwellings which will come forward in SDNP remains uncertain and it is considered there is not sufficient justification to amend the anticipated 350 dwelling allowance from SDNP in the Plan. .</p> <p>It is considered that the Plan does meet the requirements in the NPPF for plans to identify 10% of the housing requirement on smaller sites. Paragraph 9.25 sets out the overall approach and the various sources which are expected to come forward under the policies of the Plan are set out in Table H3. This is consistent with the NPPF.</p>

MM2040 26 - Beechcroft Land Limited

Name	Cleo Jefferies
Representor Number	MM2040 26
Representation Number	MM2040 26-2
Representation Summary	Support modification and states that this will enable site SW01 to come forward for development earlier.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The following letter has been prepared by Ridge and Partners LLP ("Ridge") on behalf of our Client, Beechcroft Land Limited, to support representations to Winchester City Council's Proposed Main Modifications Local Plan Consultation, running until the 16th of January 2026.</p> <p>The Regulation 19 plan has allocated sites to meet the identified needs. One such site is the land at West Hill Road North, South Wonston (hereinafter referred to as 'the subject site'). Policy SW01 of the emerging plan confirms that the site has been allocated for "about 40 dwellings".</p> <p>Policy H2 of the Proposed Local Plan initially stated that the development is phased for the latter part of the Local Plan period, whereby planning permission for housing development will not be granted before 2030. However, the Main Modification Consultation removes this phasing requirement (MM50).</p> <p>This response provides support for removing the phasing requirement (MM50 and MM115), including reasons why the development of the subject site should be brought forward for immediate release.</p> <p>Due to the current unmet need for additional housing in South Wonston, the removal of the phasing requirement will enable this need to be met within the next few years, rather than after 2030, when the need would have grown further.</p>

	<p>The subject site is situated in a suitable and sustainable location that is favourable for the local community, with good access to existing services. Therefore, the removal of the phasing requirement will ensure the delivery is not unnecessarily delayed, further complying with the National Planning Policy Framework, which surrounds boosting housing supply delivery without delay.</p> <p>To conclude, we support Main Modifications 50 and 115. Without these amendments, Policy H2 would not comply with the NPPF, the recommendations made by the Inspector, and nor would they be in the best interest of the wider community and the requirement for housing in the area.</p> <p>Supporting Information</p> <p>1. Cleo Jefferies - Ridge Planning - 15.01.25 - Main Modifications Rep_Redacted.pdf</p>
Officer Response	Comment noted. Agree no further amendment to the modification is necessary.

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-11
Representation Summary	<p>Support deletion of Policy H2.</p> <p>Considers para. 9.22 should reduce the contribution from SDNP to 280 homes in accordance with representation to MM49.</p> <p>Considers the assessment of the contribution small sites make to the overall supply in para. 9.25 is not supported as it relies on windfall.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bargate supports the deletion of Policy H2.</p>

	<p>With reference to paragraph 9.22, and as set out under Bargate’s response to MM49, the figure identified for provision in the South Downs National Park should be revised to 280 homes to take account of the re-based housing requirement/provision period.</p> <p>With reference to paragraph 9.25, the reliance on windfall sites to meet NPPF requirements around the provision of medium and small sized sites is not supported.</p> <p>Windfalls are ‘unidentified’ whereas the NPPF requires sites to be identified and/or on brownfield registered. The plan should be transparent that the requirement is not met.</p>
Officer Response	<p>Support of the deletion of Policy H2 noted.</p> <p>Do not agree that the figure for anticipated delivery in SDNP should be revised to 280 in line with recent trends. This is not considered a robust approach. The number of dwellings which will come forward in SDNP remains uncertain and it is considered there is not sufficient justification to amend the anticipated 350 dwelling allowance from SDNP in the Plan. .</p> <p>It is considered that the Plan does meet the requirements in the NPPF for plans to identify 10% of the housing requirement on smaller sites. Paragraph 9.25 sets out the overall approach and the various sources which are expected to come forward under the policies of the Plan are set out in Table H3. This is consistent with the NPPF.</p>

MM2040 41 - Home Builders Federation

Name	Mr Mark Behrendt
Representor Number	MM2040 41
Representation Number	MM2040 41-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>HBF agree with the deletion of policy H2.</p>
Officer Response	Support noted for the deletion of Policy H2.

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-7
Representation Summary	<p>Support deletion of Policy H2, including deletion of phasing from site WK5.</p> <p>Considers para. 9.22 should reduce the contribution from SDNP to 280 homes in accordance with representation to MM49.</p> <p>Considers the assessment of the contribution small sites make to the overall supply in para. 9.25 is not supported as it relies on windfall.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>Bloor Homes supports the deletion of Policy H2 and the subsequent removal of the phasing requirement that seeks to prioritise previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period.</p> <p>Concerning paragraph 9.25, the plan's reliance on windfall sites to meet the NPPF requirements for the provision of medium and small-sized sites is not supported. By definition, windfall sites are 'unidentified', whereas the NPPF requires sites to be identified and/or on registered brownfield land. The plan should therefore be explicit and transparent that this requirement is not currently met.</p> <p><u>Proposed change:</u></p> <p>Please refer to the reasoning above.</p> <p>This includes the removal of the phasing requirement from Policy WK5 (Land at Mill Lane, Wickham), which we support.</p> <p>With regard to paragraph 9.22, and as set out under Bloor Homes' response to MM49, the figure for housing provision in the South Downs National Park should be revised to 280 homes to reflect the re-based housing requirement/provision period.</p> <p><u>Proposed change:</u></p> <p>Please refer to the reasoning above.</p>
Officer Response	Support of the deletion of Policy H2 noted.

	<p>Do not agree that the figure for anticipated delivery in SDNP should be revised to 280 in line with recent trends. This is not considered a robust approach. The number of dwellings which will come forward in SDNP remains uncertain and it is considered there is not sufficient justification to amend the anticipated 350 dwelling allowance from SDNP in the Plan. .</p> <p>It is considered that the Plan does meet the requirements in the NPPF for plans to identify 10% of the housing requirement on smaller sites. Paragraph 9.25 sets out the overall approach and the various sources which are expected to come forward under the policies of the Plan are set out in Table H3. This is consistent with the NPPF.</p>
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MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-16
Representation Summary	<p>Support deletion of Policy H2.</p> <p>Considers para. 9.22 should reduce the contribution from SDNP to 280 homes in accordance with representation to MM49.</p> <p>Considers the assessment of the contribution small sites make to the overall supply in para. 9.25 is not supported as it relies on windfall.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim supports the deletion of Policy H2.</p> <p>With reference to paragraph 9.22, and as set out under Blenheim’s response to MM49, the figure identified for provision in the South Downs National Park should be revised to 280 homes to take account of the re-based housing requirement/provision period.</p> <p>With reference to paragraph 9.25, the reliance on windfall sites to meet NPPF requirements around the provision of medium and small sized sites is not supported. Windfalls are ‘unidentified’ whereas the NPPF requires sites to be identified and/or on brownfield registered. The plan should be transparent that the requirement is not met</p>
Officer Response	Support of the deletion of Policy H2 noted.

	<p>Do not agree that the figure for anticipated delivery in SDNP should be revised to 280 in line with recent trends. This is not considered a robust approach. The number of dwellings which will come forward in SDNP remains uncertain and it is considered there is not sufficient justification to amend the anticipated 350 dwelling allowance from SDNP in the Plan. .</p> <p>It is considered that the Plan does meet the requirements in the NPPF for plans to identify 10% of the housing requirement on smaller sites. Paragraph 9.25 sets out the overall approach and the various sources which are expected to come forward under the policies of the Plan are set out in Table H3. This is consistent with the NPPF.</p>
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MM2040 47 - The Clay Family

Name	Mr Andrew Partridge
Representor Number	MM2040 47
Representation Number	MM2040 47-2
Representation Summary	Support deletion of Policy H2 on the grounds that it means that the Plan is positively prepared and effective, and consistent with National Policy.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The NPPF requires local planning authorities to significantly boost the supply of housing and maintain a supply of specific, deliverable sites for the first five years of the plan period. The original proposed phasing undermined this requirement because; It would have prevented otherwise deliverable sites from contributing to the early years' supply.</p> <ul style="list-style-type: none"> • It would have reduced flexibility and could have artificially depressed the 5-year land supply position; • it would have conflicted with NPPF's expectation of maintaining a robust supply of deliverable sites; • it would have limited early access to smaller or medium sized sites that SMEs rely on; • it would have concentrated supply risk at the early phase of the Plan; it • would also reduced delivery resilience and competition; • This would have contradicted the Government's emphasis on broadening market participation and enabling rapid delivery; and • this would have contradicted the Government's emphasis on broadening market participation and enabling rapid delivery.

	<p>The deletion of Policy H2 Housing Phasing and Supply is therefore strongly welcomed because it overcomes these concerns.</p> <p>It means that the Plan is positively prepared and effective, and consistent with National Policy.</p>
Officer Response	<p>Agree no further change required.</p>

MM51 (Policy H3)

MM2040 8 - Mr Tom Hutchinson

Name	Mr Tom Hutchinson
Representor Number	MM2040 8
Representation Number	MM2040 8-1
Representation Summary	<p>Considers the reductions in housing numbers are disproportionately in the Market Towns and Rural Areas, with higher reductions in the Larger Rural Settlements. This is not justified by evidence of capacity and role of settlements within the hierarchy</p> <p>Seeks changes to MM51 and supporting text to H3, to explain the following -</p> <p>(a) The methodology for determining the proportionate share of the revised housing requirement (10,816 dwellings) allocated to each spatial area, with particular reference to evidence of settlement capacity and role in the hierarchy;</p> <p>(b) Why Larger Rural Settlements have experienced a 44% reduction when the overall district requirement reduction was 18%;</p> <p>(c) Evidence that the housing allocation to Larger Rural Settlements (880 dwellings) remains consistent with their role in accommodating sustainable growth, particularly now that Policy H2 phasing constraints have been removed;</p> <p>(d) Whether the housing trajectory at Appendix 5 to MM50 demonstrates the spatial distribution is achievable and realistic for each settlement, including Denmead.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The Market Towns and Rural Area housing provision has been reduced from 3,825 to 2,675 dwellings (30% reduction). Larger Rural Settlements have been reduced from 1,570 to 880 dwellings (44% reduction). These reductions are disproportionately greater than the overall district requirement reduction (18%, from 13,565 to 10,816 dwellings).</p> <p>This suggests the spatial distribution has been adjusted to achieve mathematical coherence following the plan period change, rather than being justified by evidence of capacity and role of settlements within the hierarchy.</p> <p>Requested changes:</p> <p>To MM51 and the supporting text to Policy H3, the Council should provide a written statement explaining:</p>

	<p>(a) The methodology for determining the proportionate share of the revised housing requirement (10,816 dwellings) allocated to each spatial area, with particular reference to evidence of settlement capacity and role in the hierarchy;</p> <p>(b) Why Larger Rural Settlements have experienced a 44% reduction when the overall district requirement reduction was 18%;</p> <p>(c) Evidence that the housing allocation to Larger Rural Settlements (880 dwellings) remains consistent with their role in accommodating sustainable growth, particularly now that Policy H2 phasing constraints have been removed;</p> <p>(d) Whether the housing trajectory at Appendix 5 to MM50 demonstrates the spatial distribution is achievable and realistic for each settlement, including Denmead.</p>
Officer Response	<p>Do not agree that further revisions are necessary to this modification.</p> <p>The changes in this modification arise from aligning the Plan's housing requirement with the latest calculation of Local Housing Need (2024) and other updates set out in Winchester Local Plan Examination Housing Numbers and Sites Update (ED42a). No further revision to the spatial distribution is proposed and the rationale for that spatial distribution is set out in the Development Strategy and Site Selection Background Paper (SD10b).</p> <p>As a point of detail, MM51 moves the 200 homes anticipated from allocation Ravenswood (KN1) from "Larger Rural Settlements" to "Remaining Rural Area" to correctly recognise that the site is adjacent to Knowle, not Wickham. This accounts for 13% of the 44% reduction highlighted by the respondent but again, is not a result of a change in the development strategy.</p>

MM2040 13 - South Wonston Parish Council

Name	Mrs Ann Peal
Representor Number	MM2040 13
Representation Number	MM2040 13-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The loss of phasing housing development through the deletion of Policy H2 which would have prioritised previously developed land over greenfield sites appears at one stage (ED34a) to have been regarded as a necessary sacrifice by Winchester City Council in order to facilitate adoption of the new Local Plan, making a nonsense of National Planning Policy 11.124c 2023. Better arguments have since been</p>

	offered. The fact remains that greenfield sites such as SW01 will be open to immediate planning applications resulting in early permanent loss to the community (ANON-AQTS-3B55-R).
Officer Response	Do not consider any amendment to the modification necessary. The Inspector has indicated Policy H2 would not accord with national policy to significantly boost the supply of housing. Agree this means that greenfield sites such as SW01 will no longer be phased to come forward later in the Plan period.

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>See earlier comment. There is a desperate need for infrastructure planning to precede (and be actioned) many developments in the South Winchester district parishes. It would be a dereliction of planning responsibility to allow developments earlier than 2030, a reasonable target date for such planning to be undertaken. The Plan should state, even if the phasing proposal is jettisoned: "No development should take place in the southern parishes until a properly conducted infrastructure plan has been developed, approved and acted upon for the area taking into account all adjacent developments." Reason: taking planning applications in isolation from the impact that developments in adjacent areas will have is a sine qua non for good planning practice.</p>
Officer Response	<p>Do not agree any change is necessary.</p> <p>An Infrastructure Delivery Plan has been prepared in consultation with service providers, taking into account proposed development in adjacent areas. Where appropriate, housing allocations such as KN1, WK5 and WK6 include a criterion requiring developments to identify and contribute to infrastructure needed to make the development acceptable in planning terms.</p>

MM2040 23 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 23
Representation Number	MM2040 23-17
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>With reference to paragraph 9.25, the reliance on windfall sites to meet NPPF requirements around the provision of medium and small sized sites is not supported.</p> <p>Windfalls are 'unidentified' whereas the NPPF requires sites to be identified and/or on brownfield registered. The plan should be transparent that the requirement is not met.</p>
Officer Response	This representation has been created in error. The comments made here are duplicated from those submitted by this respondent under MM50, regarding policy H2 and have been answered in the response to that comment.

MM2040 40 - Bargate Homes

Name	Miss Nia Powys
Representor Number	MM2040 40
Representation Number	MM2040 40-16
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>With reference to paragraph 9.25, the reliance on windfall sites to meet NPPF requirements around the provision of medium and small sized sites is not supported.</p> <p>Windfalls are 'unidentified' whereas the NPPF requires sites to be identified and/or</p>

	on brownfield registered. The plan should be transparent that the requirement is not met.
Officer Response	This representation has been created in error. The comments made here are duplicated from those submitted by this respondent under MM50, regarding policy H2 and have been answered in the response to that comment.

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43
Representation Number	MM2040 43-10
Representation Summary	<p>The revised spatial strategy does not make sufficient provision for additional growth within the Market Towns and Rural Areas, including Wickham, to both support the continued sustainability of settlements in these areas but also to provide for the identified shortfall in provision arising in the PfSH area.</p> <p>There is an opportunity for further housing need to be accommodated in Wickham through the extension of draft Policy WK5 Land at Mill Lane to include land to the north, which could potentially provide around an additional 60 homes.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>Bloor Homes supports the principle of supporting the delivery of new housing across the three identified spatial areas: Winchester Town, the South Hampshire Urban Areas and the Market Towns and Rural Area. However, the revised spatial strategy does not make sufficient provision for additional growth within the Market Towns and Rural Areas, including Wickham, to both support the continued sustainability of settlements in these areas but also to provide for the identified shortfall in provision arising in the PfSH area.</p> <p>The revised housing numbers within the Main Modifications do not take account of the opportunities available in the Market Towns and Rural Areas. A mixed approach to site allocations is required to deliver sustainable development and</p>

	<p>deliver the development required at the locations where it is most needed. This is consistent with the NPPF, which identifies the need to increase the number of medium-sized sites coming forward (paragraph 73).</p> <p>There is an opportunity for further housing need to be accommodated in Wickham through the extension of draft Policy WK5 Land at Mill Lane to include land to the north, which could potentially provide around an additional 60 homes.</p> <p><i>Proposed change:</i></p> <p>Please refer to the reasoning above.</p>
Officer Response	<p>The Council's reasons for the distribution of development and selection of this site are set out in the Development Strategy and Site Selection Topic Paper (SD10b) and the Wickham Site Selection Background Paper (SD10j). The Council still considers this to be a sound approach. No further change is considered appropriate.</p>

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-18
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>With reference to paragraph 9.25, the reliance on windfall sites to meet NPPF requirements around the provision of medium and small sized sites is not supported. Windfalls are 'unidentified' whereas the NPPF requires sites to be identified and/or on brownfield registered. The plan should be transparent that the requirement is not met</p>
Officer Response	<p>This representation has been created in error. The comments made here are duplicated from those submitted by this respondent under MM50, regarding policy H2 and have been answered in the response to that comment.</p>

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
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Representor Number	MM2040 54
Representation Number	MM2040 54-7
Representation Summary	<p>housing provision due to concerns over unmet need, affordability and distribution strategy. Considers the development strategy remains over reliant on existing commitments which does not boost the supply of housing in line with the NPPF.</p> <p>Considers the reduction in unmet needs allowance is a substantive change not accepted or agreed with PCC and HBC and is wholly inadequate and that the Council has not met the Duty to Cooperate.</p> <p>Concern that housing affordability ratio remains relatively high in Winchester.</p> <p>Considers the spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth.</p> <p>Overall considers the Plan should have much higher levels of housing development and as a minimum allocate a further 1,405 dwellings to retain an unmet needs allowance of 1,900 homes. Considers that Manor Parks presents the optimal site to deliver up to 1,200 of these dwellings in a location which would assist in a more appropriate spatial strategy distribution.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Bloor welcomes the use of the current Local Housing Need ('LHN') (based on the 2023/NPPF) as the starting point for calculating growth (676 dwellings per annum ('dpa') or 10,816 for the period 2024-2040), in accordance with PPG para.2a-005. However dispute the total planning housing provision (11,311 dwellings) due to the extensive sub-regional unmet need and acute affordability crisis, and the spatial distribution strategy.</p> <p>Total District Housing Provision</p> <p>2.13 Bloor support the amended period (2024-2040 opposed to 2020-2040) used to calculate housing need. The removal of the years 2020-2023 to some extent diminishes the reliance on completions and outstanding planning permission. Noting this, c. 59% (previously c. 69%) of the total housing provision is still noted to come from (a) completions (834 dwellings (previously 3,170 dwellings)), (b) outstanding planning permissions (5,186 dwellings (previously 6,780 dwellings)) and (c) other commitments (579 dwellings (previously 745 dwellings)) which Bloor still do not believe aligns with the Government commitment to boosting the supply of housing, and cannot be considered effective, justified or consistent with the NPPF.</p> <p>Unmet Need</p> <p>2.14 The effect of recalibrating the plan-period almost entirely removes the agreed unmet need contribution (to 495 (previously 1,900)) made by the 2040 plan to address the unmet needs of neighbouring authorities. MM49 recognises that 30% of the unmet need allowance would be apportioned to Portsmouth City Council ('PCC') and 70% would be apportioned to Havant Borough</p>

Council ('HBC'). These percentages were agreed in the respective Statements of Common Ground ('SoCG') (SD08e/Havant and SD08i/Portsmouth. The reduction of the unmet need contribution to 495 results in the Councils respectively receiving 150 dwellings and 345 dwellings from WCC opposed to 570 dwellings and 1,330 dwellings. Bloor express that this is a substantive change and the Council have provided no evidence that this has been accepted or agreed with PCC and HBC.

2.15 Bloor consider that the provision of just 495 dwellings is wholly inadequate given the fact that the unmet need in the Partnership for South Hampshire ('PFSH') is estimated to be 41,526 dwellings for the period 2024-2036 (as evidenced in our Matter 1 - Procedural and Legal Requirements and Matter 4 - Meeting Housing Need Hearing Statement).

2.16 Furthermore, Bloor note that as detailed within our Winchester EiP Plan Period Comment Letter (Responding to Inspector Note 15), this significant reduction in the provision of unmet needs essentially demonstrates that the Council were in effect using the surplus in the number of homes already in 2020 to 2024 to meet the future needs of PCC and HBC. The Council cannot be considered to comply with the Duty to Cooperate and as per section.33A of the 2004 Act this cannot be rectified after the Plan has been submitted for Examination.

Affordability

2.17 Bloor express that Winchester is amongst the UK's least affordable housing markets, with prices well above regional averages. In 2024, the affordability ratio was 12.06; within the top quartile nationally and is in the highest 20 authorities outside of London. In comparison, the average 2024 affordability ratio for Hampshire and the South East was 9.6 and for England was 7.71.

2.18 In Winchester, housing has become increasingly unaffordable as demonstrated in Figure 1 (shown in black). The affordability ratio (median house price to median workplace-based earnings) increased from 5.2 in 1997 to 9.9 in 2012 to 13.8 in 2021. Although there were minor improvements in the affordability ratio in the last three years, this has been a period when mortgage rates have increased significantly, house prices have still risen in Winchester and Winchester still remains significantly more unaffordable than in Hampshire (shown in orange), the South East (shown in green) and England (shown in purple). The gap between Winchester and the other areas has increased over time, which shows it has disproportionately become more unaffordable than the county, regional and national average. In 2012, the affordability ratio in Winchester was 1.9 more than Hampshire and 3.1 more than England, whereas in 2024 it was 2.5 more than Hampshire and 4.3 more than England.

2.19 With challenging housing market conditions, house prices in Winchester have fallen slightly in the last year, in a reflection of broad trends recorded across the wider county, regional and national average in recent years.

Spatial Strategy

2.20 Policy H1 as amended distributes development between the three spatial areas as follows: (a) Winchester Town - 4,445 dwellings / 40% (previously 5,640 dwellings / 36%), (b) South Hampshire Urban Area – 3,880 dwellings / 36% (previously 5,650 dwellings / 37%) and (c) Market Towns and Rural Areas – 2,675 dwellings / 24% (previously 3,825 dwellings / 25%).

	<p>2.21 Bloor’s objection remains that, as per our Matter 2 - Spatial Strategy Distribution of Development Hearing Statement, that the spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan’s own Integrated Impact Assessment (‘IIA’) criteria and conflicts with both current and emerging national planning policy, raising significant questions about the R19 LP’s soundness. Furthermore, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision.</p> <p>Conclusion: Proposed Amend</p> <p>2.22 Bloor consider that optimally to address the extensive sub-regional unmet need and acute affordability crisis the Council should be proactively planning above the 2023/NPPF LHN (676dpa) and for the 2024/NPPF LHN (1,144 dpa or 18,304 dwellings across the Plan period). To achieve this the Council would need to allocate sites to deliver an additional 6,973 dwellings.</p> <p>2.23 Noting this, Bloor consider that as an absolute minimum WCC should be planning for 12,716 dwellings (standard method need 2024-2040 (10,816 dwellings) and unmet needs allowance (1,900 dwellings)) in order for the eLP to be found legally compliant and sound. As such the Council would need to allocate sites to deliver an additional 1,405 dwellings. Bloor express that Manor Parks presents the optimal site to deliver up to 1,200 of these dwellings in a location which would assist in a more appropriate spatial strategy distribution. Existing allocations in the South Hampshire Urban Area would then be available to contribute towards the unmet needs allowance.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf</p>
<p>Officer Response</p>	<p>It is considered that the Local Plan has considered unmet needs in the wider area and responded appropriately throughout the Plan-making process, as set out in section 4 of the Housing Topic Paper Update (ED02) and paras. 1.17 to 1.22 WCC’s Hearings Statement for Matter 4.</p> <p>The Statements of Common Ground With Portsmouth City Council and Havant Borough Council (SD08i and SD08e) both recognise that the contribution to unmet housing needs may change may change in the course of the Local Plan Examination.</p> <p>The justification for the development strategy is set out in the Development Strategy and Site Selection Topic Paper (SD10b) and it is not considered that the proposed change is necessary.</p> <p>Disagree with proposed changes.</p>

MM54 (Policy H9)

MM2040 27 - The Church Commissioners for England

Name	Miss Nuala Wheatley
Representor Number	MM2040 27
Representation Number	MM2040 27-1
Representation Summary	Support for deletion of criterion v from Policy H9. Considers this relevant to Bushfield Camp.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>As set out in their representations, the Commissioners considered that Policy H9 point (v) should be amended so that it does not preclude the provision of academic/student accommodation on all sites allocated for 'other' uses. This is particularly relevant to large sites which are allocated for a mix of complementary uses, such as Bushfield Camp. The Commissioners are pleased to see that the proposed modification to Policy H9 deletes criterion (v).</p>
Officer Response	Agree no further change to the proposed modification necessary. the purpose of the modification is to improve the clarity of the policy and avoid unnecessary duplication.

MM2040 33 - Winchester College

Name	Ms Emma Barnett
Representor Number	MM2040 33
Representation Number	MM2040 33-2
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Winchester College support the acknowledgement that the requirements of Policy H9 apply to boarding schools and the clarification that a management plan will not be sought in such instances.</p> <p>The deletion of criterion v below is also supported.</p> <p><i>v. The proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services;</i></p>
<p>Officer Response</p>	<p>Support is noted.</p> <p>No further modification is considered necessary.</p>

MM57 (Policy H12)

MM2040 29 - Historic England

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-2
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>To fully express the point, we suggest the following clarification:</p> <p>"Sites and the layout proposed should avoid harm to the significance of heritage assets (including the contribution to significance made by their settings) or biodiversity interests"</p> <p>Supporting Information</p> <p>1. Historic England - 20260115_Winchester_LP_mainmods_consultation_GRHE_response_Redacted.pdf</p>
Officer Response	Disagree. The wording of Policy H12 had been previously agreed with Historic England. Setting and significance are already defined in legislation and in view of this, it is not considered necessary to make this change for the purposes of soundness.

MM66 (Development Allocations Winchester)

MM2040 54 - Bloor Homes limited

Name	Abigail Heath
Representor Number	MM2040 54
Representation Number	MM2040 54-9
Representation Summary	Manor Park which is an omission site that is located to the south of Winchester.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>3. Manor Parks Overview of the Site</p> <p>3.1 The site comprises 69.89 hectares ('ha') (172.7 acres) of land located at South Winchester Golf Course, circa 1.6 kilometres south-west of Winchester Town centre. The site is located adjacent (to the east) of Oliver's Battery, a post-war suburb of Winchester. Millers Lane forms the south-western boundary of the site, while the A3090 ('Romsey Road') forms the north-western boundary, which is one of the main thoroughfares into the centre of Winchester. The wider landscape to the north and west comprises agricultural land.</p> <p>3.2 The majority of the site is comprised of a golf course (constructed in the early 1990's) with seminatural and amenity grassland and associated buildings, namely the modern club house. An area of holiday lodges is also present on the site. Whilst Bloor owns the freehold of the lodges, this area is subject to a separate lease and therefore does not form part of the promotion.</p> <p>3.3 The site occupies an area of undulating land that incorporates a small valley running through its centre in a north-west to south-east direction. The two highest points of the site are at the western end of the A3090 and at the northern end of the site adjacent to Oliver's Battery, both areas lying at approximately 117m Above Ordnance Datum (AOD). Visually, the site is well contained as a result of wider local topography and the valley described above. There are some additional enclosures through pockets of woodland within the site and mature planting on the northern and western boundaries.</p> <p>3.4 The previous SHLAA identified Manor Parks as available and deliverable with an estimated capacity of approximately 1,000 dwellings which could be delivered in 10-15 years. The SHLAA ranked the site as green for all but its location in the countryside and proximity to heritage assets, for which the site received an amber ranking. These rankings were further explored within the IIA which is set out below.</p>

3.5 The Integrated Impact Assessment ranked South Winchester Golf Course as minor positive for climate change mitigation, travel and air quality, health and wellbeing, and services and facilities, negligible/negligible uncertain for economy, landscape, water resources and flood risk, minor negative uncertain for the historic environment and significant negative for biodiversity and geodiversity and natural resources. From analysis of all major allocated site rankings, Barton Farm is the only site which scores better than South Winchester Golf Course (or Manor Parks) as it receives a neutral for heritage. All further 'major' sites either score the same, including Land at Vale Farm and the Station Approach Regeneration Area, or worse.

3.6 Bloor consider that there are no planning constraints or technical showstoppers which prevent the site being considered suitable for development

Our Proposal

3.7 The proposal supports forward looking growth for Winchester and demonstrates the rationale behind a sustainable community that is led by National Planning Policy Framework by promoting: (1) local and strategic connectivity, (2) infrastructure-led development, (3) sustainable land-use supporting local housing need and (4) low visual and environmental impact

3.8 Bloor's proposal are for a new sustainable community adjacent to Winchester will comprise the following: Up to 1,200 new low carbon homes in a mix of sizes and tenures including a policy compliant provision of 40% affordable housing.

☑ A potential new 1.5 FE Primary School with the opportunity for New Special Educational Needs ('SEND') provision.

☑ A new local centre to include space for retail, a mobility hub, a potential new GP polyclinic and community facilities, with the retention of the clubhouse forming the heart of the 20-minute neighbourhood.

☑ Retention and integration of the existing clubhouse and listed Granary buildings as potential multifunctional community facilities / shared spaces.

☑ Provision of formal sports facilities to meet identified local need, including a potential LTA community tennis and padel facility and sports pitches, alongside a MUGA and associated facilities.

☑ Retention of approximately half the site as open space with a mix of uses; some areas dedicated to public recreation, some dedicated to nature, and many will be multi-functional including integration with the SuDS network bringing opportunities for both residential amenity value and biodiversity enhancement.

☑ Delivery of a 10+% biodiversity net gain ('BNG') and a nutrient neutral scheme.

☑ Provision of an enhanced high frequency bus service and multi-modal facility including car club and e-cycle hire.

☑ Provision of c. 5,000m of dedicated cycle routes and c. 2,000m of dedicated recreational footpaths.

☑ Provision of electric vehicle charging points for all homes, plus use of PV charging in public areas.

☑ Associated infrastructure works.

3.9 The proposed scheme has been developed in collaboration with WCC and Hampshire County Council officers through pre-application discussions.

Carbon Neutrality and Sustainable Travel

3.10 The principle of focusing development in Winchester Town offers the ability for reduced carbon dioxide emissions through reducing journeys by private car by locating homes in the location of the majority of jobs resulting in higher levels of containment.

3.11 Bloor instructed Calibro to develop a Variable Demand Model ('VDM') to enable comparison of the annualised CO2 emissions generated from respective locations within the district. The calibrated and validated VDM model was used to establish annualised CO2 emissions for each of the SHEELA sites within the district, assuming that each site had capacity to deliver 1,000 dwellings. The results demonstrate that Manor Parks and Sir John Moore Barracks (allocated in the current eLP) are the two stand-out locations where development can contribute to the climate emergency and minimise emissions. The difference between Manor Parks and the next best location (Lanham Lane) equates to a carbon saving of 893 tonnes achieved from 387,000 fewer vehicle kilometres and 25,500 fewer car trips each year. Bloor considers that this evidence demonstrates that Manor Parks is not only a suitable location for development but is considered should be an essential component of any new Local Plan.

3.12 The site's location to the existing non-car travel networks and the type of amenities that would be accessible within a reasonable journey of the site. In this regard, the evidence concludes that the site would provide residents of a future residential development of the site with an opportunity to access an array of local amenities, including jobs, jobs and services, by a range of non-car travel modes. On this basis, the site accords with the thrust of sustainability that runs through the whole of the Framework.

3.13 As such, the site is fundamentally focused on supporting the Council's aspirations within the Winchester Movement Strategy (WMS):

WMS Priority 1: Reduce City Centre Traffic - Providing the right homes in the right locations, i.e. closest to the greatest number of jobs, where proven propensity to travel by sustainable transport.

WMS Priority 2: Support Healthier Lifestyle Choices - Potential to connect into and part fund early delivery of Active Travel Routes identified in WMS; ability to provide active travel connections to existing P&R facilities to provide a comprehensive start/end of journey approach; ability to improve crossing facilities over Badger Farm Road for Oliver's Battery residents; internal network of leisure walk/cycle routes in generous green spaces to maximise attractiveness of active travel options.

WMS Priority 3: Invest in Infrastructure to Support - Potential to connect into and part fund early delivery of Active Travel Routes identified in WMS and; potential for highway mitigation could ease delay with related benefits to air quality / emissions.

3.14 Resultant of the above and the design elements Stagecoach have publicly supported development of Manor Parks.

Natural Environment

3.15 Manor Parks is free from any statutory designations that relate to ecology and there are none within 1km. The site is not covered by any non-statutory designations, there are however two non-statutory designations within 0.5km of the site. These are Pitt Manor SINC located 0.4km north and Yew Hill SINC located 0.4km south, neither of which are ecologically linked to the site and are separated from the site by existing roads and do not have public access. As such, it is not considered that there would be any significant impacts upon either of them.

3.16 The site contains records of protected and notable species, this is not uncommon for a site of this size. The site is an active golf course with extensive artificial maintenance and high footfall. Any area that has high numbers of the public visiting often has more species records as there are more people to spot

and report the wildlife found. Other areas often have an under recording of wildlife due to the accessibility to the public and an absence of records does not mean an absence of the species. The habitat proposals will increase the biodiversity offerings of the site and will continue to support the protected and notable species that have been previously recorded within the site.

3.17 The site contains an area of ancient woodland, identified by Bloor's consultant EDP. The woodland is to be retained and buffered within the proposals. Further native planting is proposed to expand the woodland and, as such, a net benefit is anticipated. Overall, the site is currently of low ecological

value. 3.18 Visually, the site is well contained as a result on the local topography and valley in which it is located. There is some additional enclosure through pockets of woodland within the site and mature planting on the northern and western boundaries. There is limited intervisibility between the surrounding PRow network and the site screening is afforded through topographical context, distance and intervening vegetative features and built form. The Clarendon Way which runs through the site is noteworthy, however; the development proposals would seek to enhance this where it enters and passes through the site.

3.19 Due to the site's existing land use, the character is typical of an intensively managed golf course with sculpted mounds, large swathes of open grassland, some deciduous woodland, and a scattering of tree planting. A line of small to medium artificial lakes can be found at the lowest point following the alignment of the valley. The visual character is also typical of an intensively maintained man made recreational landscape. A review of the baseline condition of the site regarding landscape matters shows that the site is uncharacteristic of the surrounding landscape by virtue of its current land use as a golf course. Whilst there are clearly some landscape receptors of value contained within the site, these could be retained and enhanced through effective design. As such, the susceptibility of the site in regard to visual matters is also considered to be low, meaning the accommodation of residential development would have a limited effect on visual receptors beyond the site's immediate context.

3.20 Manor Parks creates the opportunity to create a new low carbon community for Winchester which will deliver a generous and biodiverse rich place through retention of up to 50% of the site as new green infrastructure and will deliver a 10+% biodiversity net gain. Biodiversity and green infrastructure will be a fundamental part of the identity for the development and will create a positive setting to Winchester. Spaces will be multi-functional where appropriate, providing opportunities for play, recreation, movement, drainage, food-growing, and wildlife. Thus, Bloor considers the site an optimal development location to capitalise on environmental benefits while delivering up to 1,200 new homes.

3.21 Regarding flooding, the site is located in Flood Zone 1 and therefore has very low risk. Bloor notes that it is generally accepted that use of infiltration techniques is more effective than attenuation at managing the volume of runoff from development of greenfield sites. Furthermore, Manor Parks could deliver the four pillars of SuDS as defined in the CIRIA SuDS Manual and, as such, would exceed draft local and national guidance.

Conserving Heritage

3.22 The Heritage Appraisal of the site shows that the site contains two 'designated heritage assets,' which are both Grade II listed buildings: Staddle barn one hundred metres east of Pitt Manor farmhouse, and Cart shed one hundred metres east

south-east of Pitt Manor farmhouse. An additional four Grade II listed buildings are located between the site's north-western boundary and Romsey Road and a further seven are positioned on the opposite (north-western) side of the main road, where they represent the core of the hamlet of 'Pitt.'

3.23 The development at Manor Parks will conserve and enhance the setting of listed buildings both on site and adjoining by seeking to retain the clubhouse (subject to an appropriate end user being identified) and retention of the staddle stone barn with sensitively designed buildings and retained spaces. Winchester's new low carbon community will also address the need to create a sensitive landscaped edge to the ridge line along Hursley Road, being one of the main entry points into the historic city centre.

Vibrant Economy

3.24 Manor Parks will support WCC's vision to create a vibrant economy through providing a range of uses to create a thriving community and also increase local economic prosperity and social interaction. At the heart of the development will be the opportunity to create a mixed-use village centre with a range of choices to access community facilities, local education, nursery, a potential GP polyclinic, and a community home working hub and café with flexible workspace to help facilitate small scale start-ups and interaction space for local home workers. The precise uses are subject to further evidence and commercial considerations but there is a real opportunity to create a heart to the new development, advocating uses to meet local needs in a sustainable way.

3.25 Socio-economic benefits based on a community of up to 1,200 new homes and a potential GP polyclinic as proposed at Manor Parks will be as follows:

• 90 average construction jobs per year.

• £6 million of residential expenditure retained in Winchester.

• £10 million+ estimated Community Infrastructure Levy.

• £16.1 million additional gross value added per annum associated with additional jobs.

• 80 permanent jobs including home working, office, medical, retail, food and primary school.

3.26 Furthermore, the site is in proximity to major employers, including Winchester Hospital (2.09 km) and Winchester University (2.25 km) which could be accessed on foot or cycle and via public transport.

Living Well

3.27 The Manor Parks masterplan and key land uses, and activities are designed to remove barriers and enable people to partake in healthier lifestyles, including greater connectivity to the natural environment for recreation, during active travel and social settings, all aiding positive physical, mental, and social health and wellbeing.

3.28 To deliver the above, the scheme will be designed in accordance with the 20-minute neighbourhood principles and as such would: provide easy access to local goods and services including grocery stores and GPs; support healthy eating and increase physical activity by encouraging active modes of transportation and support improving air quality. As such, the scheme will provide a new walkable and permeable neighbourhood, through implementation of practical measures, such as allotments and community orchards and through wayfinding techniques to create a safe, secure, and memorable place.

3.29 The social and health value therefore extends beyond the site, with shared amenities, facilities, and community assets to complement and integrate with the existing and wider community. As such, Manor Parks would provide support to the ageing population living within the Badger Farm and Oliver's Battery ward by ensuring all necessary facilities within a 20-minute radius, which is considered particularly beneficial to this age demographic. Further, residents will be in contact with the outdoor environment, the landscape, ecology, and biodiversity.

3.30 Some further considerations that the proposed development would integrate to support the older proportion of the population to live healthy, independent lives for longer which could include:

- ☐ Providing dwellings which are accessible and adaptable with the potential to exceed minimum requirements defined in local policy to reflect the older than average local population

- ☐ Integrating dementia friendly design principles in both internal and external environments.

- ☐ Integrating secured by design principles so external environments feel safe and do not deter the elderly population from getting out and socialising.

- ☐ Provide external community spaces and indoor hubs so that there are opportunities for social interaction all year.

3.31 The concept and layout of the development seeks to deliver a community for everyone, all abilities, and all age groups. It will be designed with an understanding of how well-designed places effect the movement choices for all user groups and address public health challenges.

Summary

3.32 Manor Parks represents an exceptional opportunity to deliver a sustainable, well-connected community that meets Winchester's housing and infrastructure needs. The site is strategically located just 1.6 km from the city centre, adjacent to existing residential areas, and benefits from strong transport links and proximity to major employers. This location significantly reduces reliance on private car travel, supporting carbon reduction targets and aligning with the WMS priorities for active travel and reduced city centre traffic. Modelling confirms that development here would achieve one of the highest CO₂ savings compared to other potential sites in the district.

3.33 The proposals are infrastructure-led and designed around the principles of the NPPF and the 20-minute neighbourhood concept. They include up to 1,200 low-carbon homes with 40% affordable housing, a new primary school, a local centre with health and retail facilities, and extensive green infrastructure. Approximately half the site will remain as open space, delivering a biodiversity net gain of over 10%, alongside SuDS features and nutrient neutrality. Heritage assets will be sensitively integrated, and the landscape character enhanced through native planting and retention of key features.

3.34 Economically, Manor Parks will generate significant benefits, including construction jobs, permanent employment opportunities, and millions in local expenditure and infrastructure contributions. Socially, the scheme promotes health and wellbeing through walkable design, active travel routes, and inclusive spaces for all ages, including measures to support the ageing population. With no statutory ecological constraints, minimal flood risk, and strong alignment with local and national policy objectives, Manor Parks offers a deliverable, future-proof solution to Winchester's growth

	<p>challenges.</p> <p>3.35 In summary, the site’s sustainability credentials, strategic location, and ability to deliver housing, infrastructure, and environmental enhancements make Manor Parks an essential component to ensure the draft Local Plan can be found sound. It is a unique opportunity to create a vibrant, low carbon community that supports Winchester’s long-term vision for climate resilience, economic vitality, and social wellbeing.</p> <p>20260102 Manor Parks Main Modifications Consultation Representations Redacted.pdf</p>
<p>Officer Response</p>	<p>This is an omission site (Manor Parks) which has not been included in the Local Plan. Whilst the Main Modifications have updated the housing supply tables, no new sites have been included at this stage of the process. This site has been put forward in the latest 'Call for sites' and will be assessed as part of the work on the next Local Plan.</p>

MM67 (Policy W1)

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-6
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Support welcomed.

MM68 (Policy W2)

MM2040 20 - Cllr David Tozer

Name	Cllr David Tozer
Representor Number	MM2040 20
Representation Number	MM2040 20-2
Representation Summary	<ul style="list-style-type: none"> • The deletion of 'settlement gap' in policy (i), and the addition of a new criterion between (ii) and (iii) suggests that the Settlement Gap will only be fully defined as the last part of the design process once all the other considerations have been addressed. • There is no hard commitment to the gap's full retention in the design process. • A review at the end of the development build-out is irrelevant to the current plan and the reference to it should be removed. <p>Instead, this sentence should be replaced by the following:</p> <p>In doing so, it is expected that there should be no areal diminishment of the existing Littleton-Winchester Settlement Gap (apart from that part in which barrack buildings are already located). Opportunities to extend or expand the Gap should be considered favourably and also ensure the inclusion of the existing SINC.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The deletion of 'settlement gap' in policy (i), and the addition of a new criterion between (ii) and (iii) suggests that the Settlement Gap will only be fully defined as the last part of the design process once all the other considerations have been addressed. There is no hard commitment to the gap's full retention in the design process. A review at the end of the development build-out is irrelevant to the current plan and the reference to it should be removed. Instead, this sentence should be replaced by the following:</p> <p>In doing so, it is expected that there should be no areal diminishment of the existing Littleton-Winchester Settlement Gap (apart from that part in which barrack buildings are already located). Opportunities to extend or expand the Gap should be considered favourably and also ensure the inclusion of the existing SINC.</p>

Officer Response	Disagree. The deletion of the word 'settlement gap' in criterion i reflects the fact that settlement gap will need to be amended as result of the residential development taking place at the SJM Barracks site. The settlement gap will not be retained in full and it will need to be amended once the extent of the development has been agreed. In view of this, it is not possible to agree to the suggested change in the wording.
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MM2040 35 - Defence Infrastructure Organisation

Name	Mr Roger Shipton
Representor Number	MM2040 35
Representation Number	MM2040 35-1
Representation Summary	<p>1) Change the indicative number of homes: 750 – 1,000 to 1,000 dwellings</p> <p>2) Change “Land at Sir John Moore Barracks, Winchester as defined on the Policies Map, is allocated as a mixed use site which is mainly residential led comprising of 750 to 1,000 <u>about 900 1,000 dwellings homes, and other residential uses (such as care/nursing homes)</u>, ancillary and supporting uses to make this a sustainable neighbourhood with approximately an 850 space Park & Ride facility provided that detailed proposals accord with the Development Plan and demonstrate how proposals will accord with the following:”</p> <p>3) Include in the wording of Policy W2 'and other residential uses (such as care/nursing homes)</p> <p>4) Either change the text on P&R to:</p> <p><i>“Park & Ride facility</i></p> <p><i>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 <u>a</u> need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need to provide a car park on <u>Park & Ride to</u> the north side of the city. In order to meet this need, there is <u>an opportunity an opportunity requirement</u>, as part of the comprehensive redevelopment of this site, to provide <u>include approximately 850 spaces <u>within the site wide masterplan/outline planning application for</u> a Park & Ride facility. <u>The Park & Ride facility at the SJM Barracks site would need to demonstrate its relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1).</u> 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 Park & Ride facility should be considered as part of the master planning process <u>with full details of its scale/height/capacity/location and access arrangements to be submitted as part of the outline planning application process</u> 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.”</u></i></p> <p>Or as an alternative change the wording to:</p> <p><i>“Park & Ride facility</i></p> <p><i>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 <u>a</u> need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need</i></p>

	<p>to provide a car park on <u>Park & Ride to</u> the north side of the city. In order to meet this need, there is an <u>opportunity requirement</u>, as part of the comprehensive redevelopment of this site, to provide <i>include</i> approximately 850 spaces <u>within the site wide masterplan/outline planning application for</u> a Park & Ride facility. <u>The Park & Ride facility at the SJM Barracks site would need to demonstrate its relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1).</u> 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 Park & Ride facility should be considered as part of the master planning process <u>with full details of its scale/height/capacity/location and access arrangements to be submitted as part of the outline planning application process</u> 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.”</p> <p>4) Change the wording of criterion <i>xix</i>.</p> <p>The proposals include a Park & Ride facility of approximately 850 spaces <u>and demonstrates the relationship with</u> that would be in addition to and would need to be connected operationally to the 200 space Kings Barton Park & Ride light. The scale and location of the Park & Ride facility <u>should include the provision of charging points and cycle parking that</u> should be determined through the master planning process and <u>full details of the scale/height/capacity/location and access arrangements for a park and ride facility should be submitted as part of the outline planning application process</u> transport assessment include the provision of electrical charging points and cycle parking facilities; and...</p> <p>See full response.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Avison Young (AY) is instructed by the Defence Infrastructure Organisation (DIO) to provide town planning and property advice in respect of the Sir John Moore Barracks (SJMB) site on the northern edge of Winchester.</p> <p>The SJMB site is one of the largest proposed housing allocations in the emerging Winchester Local Plan. DIO has worked extensively with the City Council (WCC) to bring the site forward for redevelopment with a SJMB Concept Masterplan being endorsed by WCC’s Cabinet earlier last year.</p> <p>In relation to the Final Schedule of Proposed Main Modifications (November 2025 – doc ref ED41a) being consulted on, the purpose of this letter is to draw attention to three proposed main modifications (MM) in respect of Proposed Modification Reference MM68 to which DIO objects to in their current MMs form.</p>

These proposed modifications relate directly to the SJMB site and have the potential to significantly compromise its delivery and contribution towards the development strategy proposed in the emerging local plan. The proposed modifications in dispute and their implications for the delivery of the SJMB site are set out in the following paragraphs.

Firstly, as currently proposed/being consulted on, part of MM68 includes:

Policy W2 Main Modification Supporting Text

Supporting text:

Delete and replace text on page 313 as follows:

Allocated Uses:

- i* ***Residential led mMixed use, and***
- ii* ***Ppark and ride facility***

*Indicative number of homes: 750 – 1,000**900** dwellings.”*

The preparation of an outline application to propose the redevelopment of the SJMB site is progressing at pace and the emerging site capacity is currently anticipated to be around 1,000 dwellings. The potential capacity of the site was discussed during the EiP (Hearing Session – Matter 6) at which time DIO indicated a figure of c. 900 dwellings was reasonable. However, more recent site capacity testing has been undertaken since the EiP Hearings took place last year to support recent (December 2025) Stage 4 public consultation events as can be found at: <https://sirjohnmoorewinchester.co.uk/have-your-say/>

In particular the Stage 4 consultation boards (see: https://sirjohnmoorewinchester.co.uk/wp-content/uploads/2025/12/SJMB-Stage-4-exhibition-boards_web.pdf) include an updated illustrative masterplan (Board 7) based up a capacity layout which is now c. 1,000 dwellings, with more detailed capacity testing of the three SJMB neighbourhood areas (Central Terraces, Southern Parkland and Northern Hills) shown down to a plot level analysis (see consultation board 9 onwards) to support this c. 1,000 dwellings capacity figure. This updated figure sits within WCC’s original/Regulation 19 site capacity range for SJMB (of up to 1,000 dwellings) and should be used i.e. c. 1,000 dwellings for the purpose of Policy W2.

The following changes are proposed to ensure this MM68 can be found sound (indicated in red):

Policy W2 Main Modification Supporting Text

Supporting text:

Delete and replace text on page 313 as follows:

Allocated Uses:

- iii* ***Residential led mMixed use, and***
- iv* ***Ppark and ride facility***

*Indicative number of homes: 750 – 1,000**900 1,000** dwellings.*

This change will have implications for the Winchester Site Allocations table (MM66) within which the SJMB site is identified as having an allocation for 900 dwellings for example.

This capacity figure change would also be required to be made in the introduction of Policy W2 which is currently proposed to say (MM68):

“Land at Sir John Moore Barracks, Winchester as defined on the Policies Map, is allocated as a mixed use site which is mainly residential led comprising of 750 to 1,000 **about 900** homes, ancillary and supporting uses to make this a sustainable neighbourhood with approximately an 850 space Park & Ride facility provided that detailed proposals accord with the Development Plan and demonstrate how proposals will accord with the following:”

The following changes are proposed to ensure this MM68 can be found sound (indicated in red):

“Land at Sir John Moore Barracks, Winchester as defined on the Policies Map, is allocated as a mixed use site which is mainly residential led comprising of 750 to 1,000 **about 900 1,000 dwellings** homes, ancillary and supporting uses to make this a sustainable neighbourhood with approximately an 850 space Park & Ride facility provided that detailed proposals accord with the Development Plan and demonstrate how proposals will accord with the following:”

We have suggested that “homes” is changed to “dwellings” to be consistent with similar references/terminology in the Local Plan.

Furthermore, we would also point out that we have taken “homes” and “dwellings”, in the context of Policy W2, to be defined as being within Use Class C3. As such Class C2 use(s) could also come forward at SJMB, such as a care home/nursing home given the above introduction to Policy W2 supports a “mainly residential led” development which will allow “ancillary and supporting uses to make this a sustainable neighbourhood”. For the avoidance of doubt, we suggest Policy W2 should be further clarified to say that any number of Class C2 bedspaces that might come forward at SJMB would not be counted within the c. 1,000 homes figure.

The following further changes are proposed to ensure this MM68 can be found sound (indicated in red):

“Land at Sir John Moore Barracks, Winchester as defined on the Policies Map, is allocated as a mixed use site which is mainly residential led comprising of 750 to 1,000 **about 900 1,000 dwellings homes, and other residential uses (such as care/nursing homes)**, ancillary and supporting uses to make this a sustainable neighbourhood with approximately an 850 space Park & Ride facility provided that detailed proposals accord with the Development Plan and demonstrate how proposals will accord with the following:”

Secondly, as currently proposed/being consulted on, a further part of MM68 states:

Proposed Main Modification Para 12.29

“Park & Ride facility

*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 carpark on **Park & Ride to** the north side of the city. In order to meet this need, there is an **opportunity requirement**, as part of the comprehensive redevelopment of this site, to provide approximately 850 spaces*

within the masterplan for a Park & Ride facility. The Park & Ride facility at the SJM Barracks site would need to demonstrate its relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1). 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 Park & Ride facility should be considered as part of the master planning process **with full details to be submitted as part of the planning application 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.”

Paragraph 16 the 2024 NPPF states that in (local) plans they should:

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

It is noted that the proposed policy text has been changed from ‘an opportunity’ to provide a park and ride facility on the SJMB site to a become a MM ‘requirement’.

This proposed MM changes introduce significant and unnecessary ambiguity around the requirements of Policy W2. One interpretation of the proposed MM wording is that ‘requirement’ relates solely to the inclusion of a park and ride facility in a masterplan/planning application for the site, which DIO supports. Indeed WCC’s Cabinet has ‘endorsed’ a SJMB Concept Masterplan (February 2025) which included identifying land for a park and ride.

An alternative interpretation of ‘requirement’ relates to the comprehensive redevelopment of the site which could oblige its developers to provide/deliver the park and ride facility as part of the redevelopment of the site. Accordingly by association it is suggested that the word “provide” is replaced by “include” as set out below to again negate any ambiguity.

DIO has provided extensive information, in its Regulation 19 response and EiP Hearing Statements, to explain why a requirement for a SJMB developer to provide/deliver the Park and Ride scheme would be wholly unreasonable (as also summarised below).

The following changes are proposed to ensure this MM68 can be found sound (indicated in red):

“Park & Ride facility

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 a need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need to provide a carpark on **Park & Ride to** the north side of the city. In order to meet this need, there is **an opportunity an opportunity requirement** as part of the comprehensive redevelopment of this site, to provide include approximately 850 spaces **within the site wide masterplan/outline planning application for a Park & Ride facility. The Park & Ride facility at the SJM Barracks site would need to demonstrate its relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1).** 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 Park & Ride facility should be considered as part of the master planning process **with full details of its scale/height/capacity/location and access arrangements to be submitted as part of the outline planning application 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.”

However, should our suggested deletion of “requirement” not be accepted, then we contend that “requirement” can only be retained in the sense that it “relates solely to the inclusion of a park and ride facility in a masterplan/planning application for the site” for this policy to more precisely explain what the “requirement” should be.

As an alternative, the following changes are proposed to ensure this MM can be found sound (indicated in red):

“Park & Ride facility

*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 a need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need to provide a carpark on **Park & Ride to** the north side of the city. In order to meet this need, there is an **opportunity requirement**, as part of the comprehensive redevelopment of this site, to provide include approximately 850 spaces **within the site wide masterplan/outline planning application for a** Park & Ride facility. **The Park & Ride facility at the SJM Barracks site would need to demonstrate its relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1).** 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 Park & Ride facility should be considered as part of the master planning process **with full details of its scale/height/capacity/location and access arrangements to be submitted as part of the outline planning application 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.”*

Finally, a further proposed MM68 change relates to the proposed inclusion of ‘full details to be submitted as part of the planning application process’ which we address in more detail in relation to Policy W2 below.

As currently proposed/being consulted on, a further part of MM68 states:

Main Modification Policy

W2 “xix.

*The proposals include a Park & Ride facility of approximately 850 spaces **and demonstrates the relationship with** that would be in addition to and would need to be connected operationally to the 200 space Kings Barton Park & Ride light. The scale and location of the Park & Ride facility **should include the provision of charging points and cycle parking that** should be determined through the*

master planning

process and **full details should be submitted as part of the planning application process**transport assessment include the provision of electrical charging points and cycle parking facilities; and...”

The proposed inclusion of the requirement that; ‘full details should be submitted as part of the planning application process’ again raises ambiguity around future compliance with the policy at the planning application stage.

An outline application (OPA) is being prepared by DIO for the redevelopment of the SJMB site. The OPA will identify land to accommodate the park and ride and associated access roads. The OPA will include parameters plans to identify the maximum floorspace/parking capacity of the park and ride and the maximum height of the park and ride building, i.e. the building envelope. This will allow the EIA process supporting the wider SJMB OPA to test the impact of the park and ride facility with the wider SJMB scheme.

DIO has consistently maintained throughout the replacement local plan process that:

- The Winchester Movement Strategy Northern Park & Ride provision is Public Infrastructure deliverable under the IDP Part 2 (District Wide Infrastructure);
- DIO, nor any third-party developer of SJMB, should not be under any planning policy requirement/town planning obligation to construct or financially contribute to the Park and Ride facility (other than via a proportional S.106 contribution if there is evidence to support a proportionate contribution being needed that meets the ‘CIL’ tests);
- DIO, nor any third-party developer of SJMB, will not construct nor operate the park and ride facility; and
- Once OPA consent is granted for SJMB which will include a park and ride, the details of the appearance and layout of the park and ride facility will be matters for the future constructor/operator to decide in due course and to seek RM consent for.

Therefore, ‘full details’ cannot be provided at the OPA stage. Instead, we suggest it would be appropriate either to delete the word ‘full’ or replace it with a list of matters the application process should address, to be consistent with the suggested MM changes outlined above.

The following changes are proposed to ensure this MM68 can be found sound (indicated in red):

Main Modification Policy

W2 xix.

The proposals include a Park & Ride facility of approximately 850 spaces **and demonstrates the relationship with**that would be in addition to and would need to be connected operationally to the 200 space Kings Barton Park & Ride light. The scale and location of the Park & Ride facility **should include the provision of charging points and cycle parking that** should be determined through the master planning process and **full detail of the scale/height/capacity/location and access arrangements for a park and ride facility should be submitted as part of the outline planning application process**transport assessment include the provision of electrical charging points and cycle parking facilities; and...

	<p>We trust the suggested changes to the four parts of proposed MM68, as outlined above, can be accepted in order to make the Local Plan sound, and to provide clarity as to the extent to which the SJMB masterplan and what the future outline planning application should reasonably be expected to address. These suggested changes will also importantly clarify the 'delivery' aspects of the park and ride facility i.e. DIO, nor any third-party developer of SJMB, should not be under any planning policy requirement/town planning obligation to construct or financially contribute to whole of the cost of a Park and Ride facility (other than via a proportional S.106 contribution if there is evidence to support a proportionate contribution being needed that meets the 'CIL' tests).</p> <p>Supporting Information</p> <p>1. DIO response to WCC MMs 15.01.26_Redacted.pdf</p>
<p>Officer Response</p>	<p>1) Change the indicative number of homes: 750 – 1,000 to 1,000 dwellings</p> <p>Disagree. At a Local Plan making stage, the Strategic Transport Assessment and the HRA have tested 900 dwellings on this site as this was based on the best information that Officers had at this time (table on page 307 of the Local Plan states the number of dwellings for each of the site allocations in Winchester Town). In view of this, it is not considered appropriate to make the change that has been suggested. However, if a planning application came forward for a slightly higher figure, with the necessary supporting information, this would then be assessed at this stage of the process. It is also important to read the Local Plan as whole as there are other policies in the Local Plan such as SP3 (that encourage proposals to make the efficient use of land) and Policy DD1 (High Quality, Well Designed Places) which covers matters such as this and could be used to support a planning application for a higher number of dwellings.</p> <p>2) Change "Land at Sir John Moore Barracks, Winchester as defined on the Policies Map, is allocated as a mixed use site which is mainly residential led comprising of 750 to 1,000 <u>about 900 1,000 dwellings homes, and other residential uses (such as care/nursing homes)</u>, ancillary and supporting uses to make this a sustainable neighbourhood with approximately an 850 space Park & Ride facility provided that detailed proposals accord with the Development Plan and demonstrate how proposals will accord with the following:"</p> <p>Disagree - for the same reasons that have been outlined above.</p> <p>3) Include in the wording of Policy W2 'and other residential uses (such as care/nursing homes)</p> <p>Disagree. Similar to the response above, in terms of the evidence based that has been tested at a Local Plan-making stage. Other residential uses (such as care/nursing homes) have not been tested or assessed on this site in the Strategic Transport Assessment and the HRA. Whilst these uses have not been not specifically referred to in Policy W2 it is important to read the Local Plan as whole as there are other policies in the Local Plan that support these types of uses (e.g. Policy H5). There is support for these types of uses in the Strategic Housing Market Assessment.</p> <p>4) Change the wording of text in relation to the P&R (paragraph 12.29 and criterion xix).</p> <p>MM68 currently states:</p> <p>Park & Ride facility</p>

12.29 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 a need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need to provide a ~~car park on~~ **Park & Ride to** the north side of the city. In order to meet this need, there is an ~~opportunity requirement~~, as part of the comprehensive redevelopment of this site, to provide approximately 850 spaces within the masterplan for a Park & Ride facility. **The Park & Ride facility at the SJM Barracks site would need to demonstrate its relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1).** ~~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 Park & Ride facility should be considered as part of the master planning process **with full details to be submitted as part of the planning application process** and be in a location that is physically connected to sustainable modes of transport and capable of providing electrical charging points and cycle parking.

Criterion xix in MM68 currently states:

1. The proposals include a Park & Ride facility of approximately 850 spaces and demonstrates the relationship with ~~that would be in addition to and would need to be connected operationally to the 200 space Kings Barton Park & Ride light.~~ The scale and location of the Park & Ride facility **should include the provision of charging points and cycle parking that** ~~should be determined through the master planning process and~~ **full details should be submitted as part of the planning application process** ~~transport assessment include the provision of electrical charging points and cycle parking facilities;~~ and

The DIO/Avison Young had a meeting with Officers from WCC on 29th January 2026 to discuss the representation that was submitted on the Main Modification MM68 specifically in relation the wording of paragraph 12.29 and the wording of criterion xix of Policy W2. The DIO/Avison Young have now confirmed that they are happy with the following amendments to paragraph 12.29 and criterion xix of Policy W2 as it is agreed by both parties that this adds clarity to the Local Plan (please see confirmation below). Meetings have also taken place with HCC Highways to update them on the wording.

For completeness, LUC have assessed the wording changes below from a IIA/HRA perspective and they have confirmed that the changes listed below do not change the findings of these studies (please see separate IIA/HRA report).

The wording that has been agreed is as follows:

12.29 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 a need to reduce city centre traffic by increasing the number of Park & Ride facilities with a particular need to provide a **Park & Ride to** the north side of the city. In order to meet this need, there is a **requirement to provide appropriate land for an operational park and ride facility of approximately 850 spaces and to contribute to the delivery of that facility,** as part of the comprehensive redevelopment of this site. **The Park & Ride facility at the SJM Barracks site would need to demonstrate a satisfactory relationship with the Kings Barton 200 space Park & Ride Light site that is located on the opposite side of Andover Road (Policy W1).** The location of the Park & Ride facility should be considered as part of the master planning process **with details of its scale/height/capacity/quantum and access/connectivity arrangements to be submitted as part of the planning application process** and be in a location that is physically connected to sustainable modes of transport and capable of providing electrical charging points and cycle parking.

	<p>xix. The proposals include a Park & Ride facility of approximately 850 spaces <u>and demonstrates the relationship with</u> the 200 space Kings Barton Park & Ride light. The scale and location of the Park & Ride facility <u>should include the provision of charging points and cycle parking that</u> should be determined through the master planning process and <u>details of its scale/height/capacity/quantum and access/connectivity arrangements should be submitted as part of the planning application process;</u> and</p>
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MM2040 46 - Mr Owen Neal

Name	Mr Owen Neal
Representor Number	MM2040 46
Representation Number	MM2040 46-3
Representation Summary	<ul style="list-style-type: none"> • Under Policy W2 - SJM site allocation, the site accommodates a range of sports facilities and playing field land. • Sport England will seek the protection of the playing field land in accordance with national planning policy and Sport England's playing fields policy. • We would recommend that under part xvii, the proposals should include an assessment of need as well as condition, age, technical feasibility/viability to demonstrate the ability to retain/refurbish/redevelop, viably operate/incorporate the existing gym, leisure facilities and swimming pool.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Under Policy W2 - Sir John Moores site allocation, the site accommodates a range of sports facilities and playing field land. Sport England will seek the protection of the playing field land in accordance with national planning policy and Sport England's playing fields policy. We would recommend that under part xvii, the proposals should include an assessment of need as well as condition, age, technical feasibility/viability to demonstrate the ability to retain/refurbish/redevelop, viably operate/incorporate the existing gym, leisure facilities and swimming pool.</p> <p>Sport England is likely to seek to resist the loss of major sports facilities and playing field land unless the exceptional circumstances set out under paragraph 104 of the NPPF and Sport England's Planning for Sport principles/playing fields policy.</p>

Officer Response	<p>Disagree. The City Council has an agreed Concept Masterplan for this site which has been informed by extensive community engagement. There are a number of playing fields on the site (which are not publicly accessible). Not all of these facilities on the site will be required to support a development of around 1,000 dwellings and rather than having a blanket protection of all playing fields this matter can be assessed at the planning application stage.</p> <p>In terms of the leisure facilities (the swimming pool and gym etc) the long term viability of this facility needs to be assessed and this is already addressed in amendments to criterion xvii in Policy W2.</p>
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MM69 (Policy W3)

MM2040 29 - Historic England

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-3
Representation Summary	<p>Welcome the proposed modification, which we're aware comes at our instigation, there is a clearer form of wording that would be more technically accurate:</p> <p>"As part of the design process, proposals should assess the overall height of the proposed development and the impact on the character of the Conservation Area and the significance of Listed Buildings through development in their settings;"</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>While we welcome the proposed modification, which we're aware comes at our instigation, there is a clearer form of wording that would be more technically accurate:</p> <p>"As part of the design process, proposals should assess the overall height of the proposed development and the impact on the character of the Conservation Area and the significance of Listed Buildings through development in their settings;"</p> <p>Supporting Information</p> <p>1. Historic England - 20260115_Winchester_LP_mainmods_consultation_GRHE_response_Redacted.pdf</p>
Officer Response	<p>Disagree. The wording of this wording had been previously agreed with Historic England. Setting and significance are already defined in legislation and in view of this it is not considered necessary to make this change for the purposes of soundness.</p>

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-7
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Support welcomed.

MM70 (Policy W4)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-11
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion. Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p> <p>It includes the following text –<i>In delivering the district's housing, employment and community requirements development proposals will be expected, where appropriate, to:x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.</i></p>

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 12.46 in the supporting text for this policy already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion.*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

MM71 (Policy W5)

MM2040 4 - XR Winchester / Save Bushfield Camp

Name	Mr Ben Marsh
Representor Number	MM2040 4
Representation Number	MM2040 4-1
Representation Summary	<p>1. Objection to Deletion of Criterion xv (Air Quality & SAC Impact)</p> <p>2. Objection to Wording in Paragraph 12.52 (The "Overnight" Loophole)</p> <p>3. Comment on Onsite WwTW in Paragraph 12.52</p> <p>4. Support for New Criterion xix (Phasing)</p> <p>5. Rebuttal of Reasons The Council cites "<i>Agreement with Natural England</i>" as the reason for these changes.</p> <p>Please see full response for detailed points on the above.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>1. Objection to Deletion of Criterion xv (Air Quality & SAC Impact)</p> <p>I strongly object to the deletion of Criterion xv, which removes the requirement for air quality assessment and Habitats Regulations Assessment (HRA) regarding traffic impacts on the River Itchen SAC.</p> <p>The Council justifies this deletion based on "<i>Agreement with Natural England</i>" and the claim that the Plan-level HRA has ruled out adverse effects. This justification is Not Justified and Unsound:</p> <ul style="list-style-type: none"> • Flawed Evidence Base: The Plan-level decision to rule out adverse effects relies on air quality modelling that uses disputed traffic data (predicting that congestion will 'improve' air quality). • Admission of Lack of Scrutiny: Correspondence from Natural England (Ref: 507749) explicitly confirms that Natural England "does not have traffic modelling expertise" and was "unable to comment" on the validity of the traffic inputs used in the model. • Unsafe Conclusion: Since the statutory body admitted it did not scrutinize the traffic data underpinning the HRA, the Council cannot rely on Natural England's endorsement to remove this safeguard. The "Project Level HRA" requirement

	<p>in Criterion xv must be reinstated to ensure the developer is legally required to prove—with verified data—that 5,000+ daily vehicle movements will not harm the SAC.</p> <p>2. Objection to Wording in Paragraph 12.52 (The "Overnight" Loophole)</p> <p>I object to the amended text: <i>"If a planning application were to come forward at this site that included residential or overnight accommodation..."</i></p> <p>This text creates an unjustified assumption that <i>only</i> overnight accommodation impacts the River Itchen SAC. This is Not Effective and contradicts the Precautionary Principle:</p> <ul style="list-style-type: none"> • Commercial Nutrient Loading: Policy W5 allocates high-density employment space. This generates significant nutrient loads through daily wastewater (staff usage) and surface water runoff from large hardstanding areas/car parks, which contain nitrogen and phosphorus . • Remedy: The text must be amended to read: <i>"Development of the land has the potential to impact... in terms of nutrients in wastewater and surface water produced by the development, regardless of overnight status."</i> <p>3. Comment on Onsite WwTW in Paragraph 12.52</p> <p>I support the requirement for "groundwater modelling" for onsite Wastewater Treatment Works (WwTW). However, to be Effective, the text must acknowledge the physical constraint of the site.</p> <ul style="list-style-type: none"> • SINC Conflict: Any "onsite wastewater treatment works" would constitute industrial infrastructure. As the developable footprint is a designated SINC (Existing High Biodiversity Value), the construction of treatment tanks and infrastructure would result in the direct loss of designated habitat. • Remedy: The text should add: <i>"Any proposal for onsite WwTW must demonstrate that the infrastructure can be accommodated without loss or degradation of the designated SINC habitat."</i> <p>4. Support for New Criterion xix (Phasing)</p> <p>I support the inclusion of Criterion xix requiring phasing to align with sewerage infrastructure. This is essential for legal compliance with the Habitats Regulations.</p> <ul style="list-style-type: none"> • Observation: To be effective, "consultation with the service provider" is insufficient. The text should be strengthened to require <i>"confirmation of available capacity from the service provider prior to occupation,"</i> to prevent occupation based on aspirational rather than actual infrastructure delivery . <p>5. Rebuttal of Reasons The Council cites "Agreement with Natural England" as the reason for these changes.</p> <ul style="list-style-type: none"> • This agreement is based on Natural England's acceptance of modelling data they admitted they were unqualified to check. • The deletion of the air quality safeguard (Criterion xv) effectively removes the "safety net" for the River Itchen SAC based on an unchecked technical assumption. This renders the policy unsound.
<p>Officer Response</p>	<p>1. Objection to Deletion of Criterion xv (Air Quality & SAC Impact)</p>

	<p>Disagree. Natural England, who are a statutory agency, advised the City Council on the 10th January 2025 (ED04) that having reviewed the Winchester Air Quality Assessment dated 6th December 2024 (ED05) that their objection in relation to this site allocation had been resolved. In view of this notification, it has been agreed with Natural England to delete criterion xv in Policy W5.</p> <p>2. Objection to Wording in Paragraph 12.52 (The "Overnight" Loophole)</p> <p>Disagree. This specific wording was a recommendation in the HRA of the Main Modifications. The additional wording in the supporting text puts down a clear marker that this issue would need to be addressed if a planning application came forward that included residential development. Any impacts on the SAC would need to be assessed as part of the planning application process in consultation with Natural England.</p> <p>3. Comment on Onsite WwTW in Paragraph 12.52</p> <p>Disagree. Depending on the location of a WwTW this issue would be addressed at the planning application stage. In view of this there is no specific reason to include this additional suggested wording in paragraph 12.52 as this would be one of number of issues that would need to be addressed if any planning application included a WwTW.</p> <p>4. Support for New Criterion xix (Phasing)</p> <p>Disagree. The wording of criterion xix, which relates to sewerage infrastructure, has been agreed with Southern Water. Natural England have not raised an objection to the wording of criterion xix.</p> <p>5. Rebuttal of Reasons The Council cites "Agreement with Natural England" as the reason for these changes.</p> <p>Disagree. Natural England, who are a statutory agency, advised the City Council on the 10th January 2025 (ED04) that having reviewed the Winchester Air Quality Assessment dated 6th December 2024 (ED05) that their objection in relation to this site allocation had been resolved. In view of this notification from Natural England it is not considered that the wording of the supporting text or Policy W5 needs to be amended.</p>
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MM2040 27 - The Church Commissioners for England

Name	Miss Nuala Wheatley
Representor Number	MM2040 27
Representation Number	MM2040 27-3
Representation Summary	<p>1) Support the additional wording in paragraph 12.52 regarding nutrient neutrality solutions but note this assessment has already been completed for application 23/02507/OUT in consultation with Natural England and the Environment Agency.</p> <p>2) Support for the removal of criterion xv, citing the updated Statement of Common Ground between WCC and Natural England.</p> <p>3) Object to new criterion xix regarding phasing development with sewerage infrastructure delivery. They argue this is unnecessary as a policy requirement and should instead be handled at the application stage. They note their current proposals already include a Wastewater Treatment Works in the first construction phase.</p>

<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The additional wording included at paragraph 12.52 requires any proposed nutrient neutrality solution for the site that involves an onsite wastewater treatment works to be accompanied by an assessment of impacts to the River Itches SAC through discharges from the WwTW including groundwater modelling, and agreed with Natural England and the Environment Agency. The Commissioners are supportive of this wording, however would comment that this assessment has already been undertaken in relation to application ref. 23/02507/OUT, in discussion with both Natural England and the Environment Agency.</p> <p>The Commissioners support the proposed modification to remove criterion xv. Since the inclusion of this wording, an updated Statement of Common Ground ('SoCG') has been prepared between WCC and Natural England (ED19). Following Natural England's original representations to the Regulation 19 Local Plan, WCC undertook an Air Quality Assessment (SD04b). The assessment concludes that the Local Plan would decrease pollutant concentrations/deposition rates at the River Itchen SAC. Therefore, the Local Plan would not have an adverse effect on the site integrity of the River Itchen SAC.</p> <p>Consequently, the Council published an addendum to the Habitats Regulations Assessment (SD04a) which concludes that there will be no adverse effects on the integrity of the River Itchen SAC due to air pollution. The addendum to the HRA also recommends the removal of point (xv) from Policy W5 (Bushfield Camp), as adverse effects have now been ruled out.</p> <p>An additional Policy criterion (xix) has been added, stating that "occupation of the development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider". The Commissioners do not consider this criterion is necessary and should be deleted. It is a matter that should be dealt with at the application stage rather than forming a policy requirement, whether phasing is required will depend on the type and scale of the scheme that comes forward on the site. Notwithstanding, the current proposals for Bushfield Camp include the provision of a Wastewater Treatment Works within the first phase of construction. This infrastructure, and its provision on site, would likely be a condition of the approval of permission and the detail would be agreed through the reserved matters process.</p> <p>We consider that the policy does not need to include this phasing requirement and the additional policy criterion is not justified.</p>
<p>Officer Response</p>	<p>1) Support welcomed and point noted.</p> <p>2) Support welcomed.</p>

	3) Disagree. This additional criterion was added at the request of Southern Water. The 'live' planning application for the site has not yet been determined as we are waiting for further information from the applicant so we can reconsult on the planning application. We understand that this further information would include the details of the proposed onsite Waste Water Treatment Works which will need to be formally consulted on. In view of this it is not considered appropriate to delete this criterion.
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MM2040 30 - Natural England

Name	Rachael Clemson
Representor Number	MM2040 30
Representation Number	MM2040 30-3
Representation Summary	Paragraph 2.20 advises rewording requirement for assessment of impacts to the River Itchen SAC from any onsite treatment works suggesting this is not required for the HRA. Whilst is not a requirement for the Plan HRA, a Project level HRA will be required to assess these impacts and any mitigation that may be required and we suggest this is clarified in the policy wording and MM71.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Paragraph 2.20 advises rewording requirement for assessment of impacts to the River Itchen SAC from any onsite treatment works suggesting this is not required for the HRA. Whilst is not a requirement for the Plan HRA, a Project level HRA will be required to assess these impacts and any mitigation that may be required and we suggest this is clarified in the policy wording and MM71.</p> <p>534477 NE response to WCC Local Plan Main Modifications (002).pdf</p>
Officer Response	<p>Further clarification was sought from Natural England on their representation as it was unclear from reading it what section of the Local Plan they were referring to as paragraph 2.20 in the Local Plan does not relate to Bushfield Camp site allocation. Natural England's further clarification which was sent on 19/01/2026 stated:</p> <p>'I have not commented on the proposed modifications to the Bushfield Camp policy itself, I was commenting purely on the text in the HRA (of the MM's) which says "<i>Policy W5 Bushfield Camp: MM71 introduces a new requirement for mitigation into the supporting text that any nutrient neutrality that involves on-site wastewater treatment works must assess impacts on River Itchen SAC, including groundwater modelling. This is not required for the HRA and it is recommended that this paragraph is reworded</i>" It was this last line that prompted my comment that an HRA will be required with any planning application proposing this e.g. a project level HRA, as it seemed to be suggesting that an HRA will not be required at any stage, if you are not proposing any changes to the wording around any onsite treatment works needing to assess impacts to the River Itchen SAC then you don't need to do anything further'.</p>

	In view of this further clarification from Natural England that their comment relates to the HRA of the MM's and not the wording in the Local Plan no further action is required.
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MM73 (Policy W7)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-5
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage. Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Agree in part.</p> <p>For consistency amend criterion xv as follows (which includes the wording in the Main Modifications):</p> <p>xv Provide physical and social infrastructure needed to make the development acceptable in planning terms including addressing any needs for education provision (Primary and Secondary) to meet the needs for the development;</p>

	<p>Disagree with explicitly including health infrastructure in the criterion. Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p> <p>It includes the following text –<i>In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to:x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.</i></p> <p>Paragraph 3.8 of the supporting text is followed by the following – <i>Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.</i></p> <p>Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 12.73 in the supporting text for this policy already says: <i>‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion’.</i></p> <p>The Infrastructure Delivery Plan was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –</p> <p><i>The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.</i></p> <p>In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.</p>
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MM2040 55 - Environment Agency

Name	Environment Agency
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Representor Number	MM2040 55
Representation Number	MM2040 55-8
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Support welcomed.

MM74 (Policy W8)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-1
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Agree in part.</p> <p>For consistency amend criterion x as follows (which includes the wording in the Main Modifications):</p>

x The proposals consider and address the provision of **physical and social** infrastructure needed to make the development acceptable in planning terms together with education provision (Primary and Secondary) to meet the needs of the development.

Disagree with explicitly including health infrastructure in the criterion. Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.

It includes the following text – *In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to: x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.*

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 12.92 in the supporting text for this policy already says: *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion’.*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-7
Representation Summary	As stated at Regulation 19, We believe that criterion vi should be deleted, noting it feels unfinished and the content of what is currently criterion vii.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>As stated at Regulation 19, We believe that criterion vi should be deleted, noting it feels unfinished and the content of what is currently criterion vii.</p> <p>Supporting Information</p> <p>1. Historic England - 20260115_Winchester_LP_mainmods_consultation_GRHE_response_Redacted.pdf</p>
Officer Response	As criterion vi duplicates criterion vii recommend deleting criterion vi.

MM76 (Policy W10)

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-9
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	Support welcomed.

MM79 (Policy SH1)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-6
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion. Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p> <p>It includes the following text –<i>In delivering the district's housing, employment and community requirements development proposals will be expected, where appropriate, to:x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.</i></p>

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 13.15 in the supporting text to this policy already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion. This will not apply to any development which comes forward under existing outline consents’.*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

MM2040 37 - Bryony Stala

Name	Bryony Stala
Representor Number	MM2040 37
Representation Number	MM2040 37-1

<p>Representation Summary</p>	<p>Broadly supports the modifications to Policy SH1, particularly the inclusion of wording allowing for both on-site and off-site mitigation measures for European sites through a Green Infrastructure Strategy. However, they object to specific elements of the SH1 policy map in Appendix 1.</p> <p>1. Extra Care Provision Location Concerns</p> <p>The current map incorrectly identifies the 'Extra Care' land area as larger than required and positioned incorrectly. The respondent notes that discussions with Hampshire County Council about the exact location are ongoing, necessitating flexibility in the policy map. It is requested that the hatching used to identify the extra care land is removed and replaced with the blue currently used to identify the Local Centre. The legend should remove reference to the 'Local Centre' and replace it with 'Mixed Use - including Local Centre, Extra Care Provision and Housing.</p> <p>2. Mixed-Use Development Flexibility</p> <p>Parcels M1 and M3 should maintain flexibility for mixed-use development including housing, consistent with paragraph 13.10 and site-specific requirement point iii. Request a new colour designation in the legend for these parcels to allow for "mixed use and/or additional housing".</p> <p>3. Dwelling Equivalent Calculation</p> <p>There is disagreement about the dwelling equivalent figure for the extra care provision. The documentation and discussions with Hampshire County Council established the 85-bed requirement as equivalent to 65 dwellings, not 45 as stated in paragraph 13.10.</p> <p><u>Requested Amendment</u></p> <p>Paragraph 13.10 be amended to refer to a '65 dwelling equivalent'.</p>
<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>MM79 – Policy SH1 - Object</u></p> <p>This representation is made by Savills on behalf of Grainger plc/West Waterlooville Developments.</p> <p>In the main, Grainger support the proposed modifications made to the supporting paragraphs and wording of policy SH1, with recognition that additional wording has been included within the policy text to allow a future Green Infrastructure Strategy to consider both on site and off site measures required to mitigate harmful impacts on European sites.</p> <p>An objection is made in relation to the amendments made to the SH1 policy map listed as Appendix 1.</p> <p>The principle of amending the map is supported. However, the updates made are in part incorrect and overall are likely to result in an inflexible approach to the delivery of additional housing on the site.</p> <p><u>Issue 1 – Local Centre and Extra Care Reference</u></p>

	<p>The site identified as 'Extra Care' land is incorrect. Whilst the extra care land is to be provided within the Local Centre, the area shown is larger than required and sits further to the front of the parcel than is intended. The area of land to be used for the purpose of the extra care provision is currently being discussed with Hampshire County Council and will be confirmed in due course. As such, it is important that the policy map maintains a degree of flexibility in the location shown for the Extra Care provision.</p> <p>Further to this, land within the Local Centre will provide housing, in line with the original outline consent and to accommodate some of the housing uplift agreed by way of this Local Plan. This adds greater weight to the need to maintain a degree of flexibility in relation to the uses allocated within this development parcel, with a review of the wording used on the legend needed.</p> <p><u>Requested Amendment</u></p> <p>It is requested that the hatching used to identify the extra care land is removed and replaced with the blue currently used to identify the Local Centre. The legend should remove reference to the 'Local Centre' and replace it with 'Mixed Use - including Local Centre, Extra Care Provision and Housing.'</p> <p><u>Issue 2 – Parcels M1 and M3</u></p> <p>The approved land use plan for the Berewood development identifies parcels M1 and M3 for Mixed Use development. It is recognised that discussions with the Council have focused on the potential for parcels M1 and M3 to be used for residential, it is considered that a degree of flexibility needs to remain for mixed use, including housing.</p> <p>This is consistent with paragraph 13.10 of the supporting policy text which recognises the ability for additional dwellings to be located within mixed use areas, and with the wording of site specific requirement point iii which refers to the provision of 'about 23 hectares of employment land, including uses which will help link the development to the town centre, create a vibrant commercial area and include some mixed housing/commercial areas'.</p> <p><u>Requested Amendment</u></p> <p>It is requested that a new colour is added to the legend and used for parcels M1 and M3. The legend should refer to the parcels being for 'mixed use and/or additional housing' to provide suitable flexibility for future development options.</p> <p><u>Issue 3 – Extra Care residential unit equivalent</u></p> <p>Paragraph 13.10 refers to the older persons housing scheme (extra care) as providing a '45 dwelling equivalent'. It has long been understood by Grainger that, in discussion with Hampshire County Council, the 85 bed extra care requirement set out in the S106 equates to a 65 dwelling equivalent. This is documented in meeting minutes and correspondence with the LPA.</p> <p><u>Requested Amendment</u></p> <p>Paragraph 13.10 be amended to refer to a '65 dwelling equivalent'.</p>
Officer Response	1. Local Centre and Extra Care Reference

Agree to change the wording in the legend to 'Mixed Use – Housing, Local Centre and Extra Care'. It is envisaged that this area would be predominately residential development but it is appreciated that discussions are still ongoing with HCC regarding the exact location of the Care Home so being more flexible in terms of the wording of the key in the inset map of the Local Plan on this issue would be beneficial.

2. Parcels M1 and M3

Disagree. The insert map in the Local Plan is only setting out the broad expectations for where things might be. It is envisaged that this area would be predominately residential development which may include some other uses would need to be tested and assessed against other planning policies. At a Local Plan level this work has not been completed.

3. Extra Care residential unit equivalent

Disagree. The extra care development has not yet received full planning permission. It is important to note that the site capacities that have been included in the Local Plan are not ceilings and the figure that has been quoted in paragraph 13.10 (45 dwelling equivalents) is in the right ball park so in view of this, it is not considered necessary to amend this figure for the purposes of soundness as this could change.

MM82 (Policy SH4)

MM2040 25 - Kennedy Wilson

Name	Mr Lawrence Clark
Representor Number	MM2040 25
Representation Number	MM2040 25-2
Representation Summary	<p>Support proposed modification.</p> <p>Reiterates comments regarding concerns raised regarding building heights and parkland requirements. Further amendments to policy and supporting text proposed to improve flexibility.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Knight Frank, on behalf of Kennedy Wilson (KW) Forum Ltd, who are landowners at Solent Business Park, have been actively engaged in the Local Plan examination and have submitted representations at Regulation 18 Stage (Ref. ANON-KSAR-NKFC-K), Regulation 19 Stage (Ref. ANON-AQTS-32G3-R), Local Plan Hearing Statements (Ref. ANON-AQTS-32G3) and attendance at Local Plan Hearing Session Matter 16 (Creating a vibrant economy).</p> <p>The proposed modification to this policy to create flexibility and broaden the types of employment generating uses is welcomed and positively responds to comments made previously. This change in the wording will enable the delivery of employment generating uses across the Local Plan Period, and better responds to the evidence base. These changes are fully supported.</p> <p>It is noted the requirement for development to deliver 30% parkland and generally restrict buildings to 14 metre/3 storey building height threshold remains in the main policy text. We therefore wish to reiterate comments made previously in hearing statements, representations, and at Local Plan hearing sessions as set out below.</p> <p><u>Height</u></p> <p>In relation to the height threshold, at the Stage 2 Matter 16 (Creating a vibrant economy) Hearing Session which included Policy SH4, our recollection of the discussions was that the Council indicated its agreement to remove specific reference to development proposals being over three storeys or 14 metres in height within the main Site Allocation policy, and it was suggested that height</p>

guidance could be included within the supporting policy text instead. We understood that the Inspector also supported this change though note it has not been referenced in subsequent documentation.

Notwithstanding this, we suggest that the supporting text could refer to the existing typical building heights within the Site Allocation and include wording which requires new development to be of an appropriate height taking account of the local context. It is considered that this approach would mean that applicants are able to make a case for a proposal having regard to the existing context, and with regard to other design policies within the Development Plan. We do not see a need for a specific height restriction to be set out in the policy and consider this is unnecessarily restrictive, and there is no evidence base to support this approach where the alternative approach we put forward would achieve the same outcome, but enable greater flexibility within the Site Allocation policy itself.

It is acknowledged the Council responded to previous representations in their Stage 2 Hearing Statement regarding the height threshold, stating the policy does provide flexibility as building heights should '*generally*' avoid being over three storeys or 14 metres, however we consider this to still be unduly restrictive in the level of height achievable.

We therefore request guidance on height is instead included within a new paragraph following paragraph 13.36 of the supporting text. Suggested wording is as follows:

"13.37

In respect of height and scale, new development should be designed having regard to existing built form in the immediate context within the wider Solent Business Park. Development should be informed by appropriate and proportionate technical analysis, such as townscape/landscape and visual impact assessments, to demonstrate the acceptability of proposals in design terms."

Parkland

In relation to the 30% parkland requirement, at the Stage 2 Matter 16 (Creating a vibrant economy) Hearing Session our recollection of the discussions was that the Council indicated its agreement to remove specific reference to the 30% parkland requirement, and agreed parkland/landscaping policy guidance could be included within the supporting policy text instead. We understood that the Inspector also supported this change though note it has not been referenced in subsequent documentation. However, reference to 30% parkland still remains in the main policy text.

To repeat our previous representations, we urge the Council to take a more flexible and less prescriptive approach. Kennedy Wilson believe that landscaping and amenity space is a key component of delivering high quality employment development, as it can provide significant benefits to the environment, employees and the wider community. But this should not stifle development and jobs creation where the specific target cannot be met.

We suggest that the supporting text could refer to the requirement for proposals to deliver high quality and multifunctional landscaping. We believe the wording should focus on the quality and value of landscaping and open space rather than the quantity which is likely to lead to better design outcomes and benefits.

	<p>We therefore suggest specific reference to 30% parkland is removed from the main policy text (paragraph iv.) and that a new paragraph following paragraph 13.37 of the supporting text is added which reads:</p> <p><i>“13.38</i></p> <p><i>Solent Business Park has a character of large employment generating uses within an established parkland setting. New development proposals will be required to include substantial amenity greenspace which shall be designed to reflect and respond to the existing landscape context.”</i></p>
<p>Officer Response</p>	<p>Proposed revisions not agreed with. It is considered the Plan does provide sufficient flexibility regarding heights and landscape requirements for the reasons set out in para. 1.92 to 1.94 of the Council's Hearings Statement for Matter 16.</p>

MM84 (The Market Towns and Rural Area Allocations)

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-6
Representation Summary	Object as the Knowle Triangle should not be designated as Welborne Open Space as it is an integral part of the community led development at Knowle. Concerns over the status and progress of the outstanding s106 agreement associated with the Ravenswood application. Considers the Ravenswood allocation should be removed from the Plan until there is clarity over how this proposal can be progressed and confirm there remains community support.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>WKPC has made separate representations regarding this section re “Remaining Rural Areas” specifically with regards to Knowle. The substance of that representation is reproduced below:</p> <p>In the 2024 Winchester Local Plan submitted to the Planning Inspectorate, Knowle Village was allocated provision for 200 dwellings. This allocation was made notwithstanding Winchester City Council’s own hierarchy settlement facility scoring methodology, under which Knowle Village would have been allocated zero dwellings due to the absence of public transport, local schooling, and essential services e.g. fresh food shops that can meet the daily needs of residents.</p> <p>The inclusion of the Knowle Village site was predicated solely on its designation as a community-led development. This designation was conditional upon the transfer, by way of gift, of specified parcels of land to the Parish Council, namely the Knowle Village Triangle and the Knowle Village Water Meadows, together with the provision of a commuted sum totalling £670,000.</p> <p>The commuted sum comprises: £250,000 towards community land mitigation works (currently being finalised with Wickham & Knowle Parish Council’s appointed mitigation landscape consultant, Deacon Design; £160,000 for the ongoing maintenance of community land; and £260,000 as a contribution towards a community building.</p> <p>These obligations were to be secured by a Section 106 agreement; a copy of the latest draft agreement can be provided.</p>

The gifted land was intended to form a designated strategic gap between Fareham and Winchester, particularly in light of the proposed development of approximately 6,000 dwellings at the settlement known as Welborne Village, located on the boundary of Knowle Village. The Parish Council has been actively seeking to progress and execute the Section 106 agreement for several months.

However, the Local Plan has incorrectly defined the land promised to the Parish as part of this community-led development and detailed within the Section 106 agreement as “Welborne Open Space.” This designation is erroneous. The land in question is located within Knowle Village Parish and constitutes an integral element of the community-led development in Knowle Village. There is no planning or policy justification for land associated with a development in Knowle Village to be designated as open space for a neighbouring development under a different planning authority. The land should be designated as ‘Knowle Open Space’ as retained under settlement gap NE7.

The provision for Fareham Borough Council to develop infrastructure on the Knowle Triangle (section 14.115) should be removed or updated to state that any such development requires the permission of Wickham and Knowle Parish Council, as the new landowners under the Section 106 agreement, and must be carried out in accordance with their mitigation plans, given that this land is part of the community-led development.

The Parish Council has now been formally advised that the land promised to the Parish, along with the commuted sums set out in the Section 106 agreement, are potentially void. This is due to Homes England’s decision to sell the land to Buckland Development (Welborne), who have indicated an unwillingness to honour the community-led scheme.

In light of these developments, it is submitted that the allocation of 200 dwellings to Knowle Village should be removed from the Local Plan until such time as the Parish Council has been provided with and reviewed any proposals from Buckland Development (Welborne), and can determine whether there remains demonstrable community support for the development. Without community development, there can be no homes at Knowle Village. The Parish Council would challenge the soundness of the Plan on the basis that Knowle Village, a small village lacking public transport, local schooling, and essential services e.g. fresh food shops has been allocated 200 dwellings, whereas larger settlements such as Swanmore have been allocated zero new sites, and market towns such as Bishop’s Waltham only 100 dwellings. Such disproportionate allocation raises fundamental concerns regarding the consistency and appropriateness of the Plan’s settlement strategy.

Furthermore, allowing disproportionate development in Knowle Village risks setting an undesirable precedent. It could encourage similar allocations in other unsuitable rural villages, thereby undermining the principles of sustainable and appropriate development that the Local Plan must uphold.

To clarify, the Parish Council requests that all 200 dwellings allocated to Knowle Village be removed from the Local Plan until such time as a new Section 106 agreement is provided by Buckland Development (Welborne). This agreement must be subject to full consultation with Wickham and Knowle Parish Council and Knowle Village residents to ensure that demonstrable community support for the development remains and that the designated settlement gap is clearly defined and protected through transfer to the Parish Council as per the initial agreement.

Officer Response	<p>The Knowle Triangle is identified in the Welborne Plan as having the potential to provide Green Infrastructure. Therefore at this time it is considered appropriate for the Winchester District Local Plan to reflect this. The current wording regarding the Knowle Triangle is considered appropriate and flexible in these circumstances. WCC is holding ongoing discussions with Homes England to progress the outstanding s106 agreement and issue a planning consent for development of Ravenswood. The comments regarding the suitability of Knowle for a development of 200 homes are noted. The rationale for the proposed allocation is set out in the Development Strategy and Site Selection Background Paper (SD10b) and the position is summarised in paras. 2.55 to 2.56 of WCC's Hearings Statement for Matter 8.</p>
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MM88 (Policy BW4)

MM2040 18 - Mr Simon Harrison

Name	Mr Simon Harrison
Representor Number	MM2040 18
Representation Number	MM2040 18-1
Representation Summary	<ul style="list-style-type: none"> • Removing the "will not be granted before 2030" constraint is not sound in the case of Bishops Waltham. • the amenities in Bishops Waltham are already extremely stretched and these need to be increased before increasing the housing/population further. • The Doctors surgery is using portacabins in their car park and it is also near impossible to get a doctors appointment/park. • The council will need to increase the capacity of the car parking further to alleviate cars spilling out on the street from these developments and causing traffic chaos. <p>With regard to site BW4:</p> <ul style="list-style-type: none"> • The current proposed access to this site (by demolishing 2 houses on Hoe Road) is too close to the junction of Rareridge Lane. • This will mean this junction will become an accident hotspot due to blind spots in a drivers view. • The access should be moved further east. • The speed limit should be reduced to 30mph or possibly even 20mph and measures to support a lower speed environment will also be required. • Developer should pay the costs to do this as without the development they would not be required. • Wording should be to read "Provided a reduced speed limit of 20mph with measures to support a lower speed environment and the creation of a new village gateway on Hoe Road to the east of the site'.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Removing the "will not be granted before 2030" constraint is not sound in the case of Bishops Waltham. This is because the amenities within Bishops Waltham are already extremely stretched and there needs to be a period of consolidation and increasing the capacity of those amenities before increasing the housing/population further. So, I believe in the case of Bishops Waltham some phasing of development is required.</p>

	<p>For example the doctors surgery has now reverted to using portacabins in their car park. It is also near impossible to get a doctors appointment. When you do get one, it is then impossible to park close to the surgery. The town is in desperate need of a new doctors surgery with sufficient parking.</p> <p>With the lack of car parking in the latest developments currently being built in Bishops Waltham, the council will need to increase the capacity of the car parking further to alleviate cars spilling out on the street from these developments and causing traffic chaos.</p> <p>Perhaps it should be a requirement that the developers increase the capacity of amenities on these sites i.e. adequate car parking. Perhaps this site could be used for a new doctors surgery?</p> <p>The current proposed access to this site (by demolishing 2 houses on Hoe Road) is too close to the junction of Rareridge Lane. In my opinion the angles of the resulting intersecting roads will mean this junction becomes an accident hotspot due to blind spots in a drivers view. Access should be moved further east.</p> <p>The speed limit should be reduced to 30mph or possibly even 20mph and measures to support a lower speed environment will also be required. To be clear, the developer should pay the costs to do this as without the development they would not be required. So I believe this section should read "Provided a reduced speed limit of 20mph with measures to support a lower speed environment and the creation of a new village gateway on Hoe Road to the east of the site.</p> <p>Thank you for your consideration.</p>
<p>Officer Response</p>	<p>Disagree. The phasing policy (Policy H2) was discussed at length at the Local Plan examination and was the subject of an Inspector led public consultation. In the Inspector's note ED38a the Inspector requested that the Council prepared a MM to delete this policy as Policy H2 would not accord with the national policy to significantly boost the supply of housing.</p> <p>In terms of the access to site BW4, HCC Highways have assessed the proposed site access and they have confirmed that it meets their highway standards.</p> <p>In terms of introducing a 20 mph speed limit it is understood that HCC Highways have a process that sits outside of the Local Plan-making process (once the development has been built) for Parish Council's to request changing a speed limit 20mph speed limits in residential areas Transport and roads Hampshire County Council</p>

MM2040 23 - Blenheim Strategic

<p>Name</p>	<p>Miss Nia Powys</p>
<p>Representor Number</p>	<p>MM2040 23</p>
<p>Representation Number</p>	<p>MM2040 23-1</p>
<p>Representation Summary</p>	<ul style="list-style-type: none"> Support the removal of the policy related to phasing following the deletion of Policy H2.

	<ul style="list-style-type: none"> • Supports the relaxation of the policy wording, which allows for greater flexibility in speed reductions on Hoe Road. • The Regulation 19 representations supported accommodating this reduction in any event; however, the revised wording provides a more flexible approach and avoids creating an unnecessary barrier to development.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim Strategic support the removal of the policy related to phasing following the deletion of Policy H2. Blenheim Strategic also supports the relaxation of the policy wording, which allows for greater flexibility in speed reductions on Hoe Road. The Regulation 19 representations supported accommodating this reduction in any event; however, the revised wording provides a more flexible approach and avoids creating an unnecessary barrier to development.</p>
Officer Response	Support welcomed.

MM2040 44 - Blenheim Strategic

Name	Miss Nia Powys
Representor Number	MM2040 44
Representation Number	MM2040 44-13
Representation Summary	Blenheim Strategic support the removal of the policy related to phasing following the deletion of Policy H2.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Blenheim Strategic support the removal of the policy related to phasing following the deletion of Policy H2.</p>

	Blenheim Strategic also supports the relaxation of the policy wording, which allows for greater flexibility in speed reductions on Hoe Road. The Regulation 19 representations supported accommodating this reduction in any event; however, the revised wording provides a more flexible approach and avoids creating an unnecessary barrier to development.
Officer Response	Support welcomed.

MM2040 50 - Mr Saxon Tovey

Name	Mr Saxon Tovey
Representor Number	MM2040 50
Representation Number	MM2040 50-1
Representation Summary	<p>Object to deletion of phasing and points out this is a change in the Council's position.</p> <p>Object that the proposal to reduce the speed to 30 MPH before the new junction has been removed as this had been identified previously as a necessity to reduce the risk of serious collisions.</p> <p>Object that proposed access is poorly located and unsafe.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>I strongly object to the removal of the original positioning statement in the BW4 Policy whereby it was declared that no permission would be granted before 2030.</p> <p>I attended the original meetings held in the Bishops Waltham Parish Council office in The Jubilee Hall, and a very strong assurance was given at that meeting by the councillors that this was definitely the position of the Council.</p> <p>It is very much a kick in the teeth that this position has been summarily revoked at the drop of a hat by Winchester Council without any input from from the people most affected by this development.</p> <p>With regards to criterion vii. , I am also concerned that the proposal to reduce the speed to 30 MPH before the new junction has been removed as this had been identified previously as a necessity to reduce the risk of serious collisions.</p>

	<p>I also believe that the proposed location for the new access junction is in the worst possible place because of the angle that Rareridge Lane joins Hoe Road and the angle of the new access road as shown on the proposed plans. Motor vehicles already encroach into Hoe Road from Rareridge Lane due to reduced visibility caused by the sharp angles involved. The new road location will increase the number of road users competing for access onto the road network in a very small area.</p>
Officer Response	<p>The Proposed Modification is considered necessary, following the Examinations Hearings and receipt of the Inspector's Note on Post-Hearing Action Points (ED38a), to ensure the Plan accords with national policy to significantly boost the supply of housing.</p> <p>Criteria iii to vii of Policy BW4 in the Proposed Submission Plan have been prepared with the input of Hampshire County Council as Highway Authority to address the potential traffic and road safety impacts of the proposed development. Hampshire County Council have requested the amendment to criterion vii and, as they will be advising the City Council on any planning application in this regard, the amendment is considered appropriate.</p> <p>Apart from the to the amendment to criterion vii set out in MM88, the Highway Authority is content with the Local Plan approach. Therefore it is considered that the development can be delivered in an appropriate manner.</p> <p>Therefore MM88 is considered appropriate and no further change is considered necessary.</p>

MM2040 51 - Mr NEIL BARBER

Name	Mr NEIL BARBER
Representor Number	MM2040 51
Representation Number	MM2040 51-1
Representation Summary	It is considered that this representation was made in error. The respondent did make a full representation to MM88.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The removal</p>
Officer Response	It is considered that this representation was made in error. The respondent did make a full representation to MM88.

MM2040 52 - Mr NEIL BARBER

Name	Mr NEIL BARBER
Representor Number	MM2040 52
Representation Number	MM2040 52-1
Representation Summary	<p>Object to removal of phasing on grounds that infrastructure such as doctors surgery should be sufficient developed.</p> <p>Concern proposed access will create an accident black spot, despite proposed reduction in road speed.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>A) The removal of the restriction for planning, where it was not be considered prior to 2030. This should remain until Bishops Waltham infrastructure is sufficiently developed and can be seen to be robust. For example; doctor availability is still problematic and to burdn them further can only make the situation more difficult. Also dispite additional parking being provided at the Jubilee Hall, traffic within the main street and surrounding roads is overburdened and can only get worse with additional traffic that would inevitably be)generated.</p> <p>2) The proposed access on Hoe Road to the development will create an accident black spot. It's proximity to the bend in Hoe Road, Rareridge Lane and entrances to the existing properties not safe. Even a reduction in the speed limit on Hoe Road does not mean all drivers will observe it. The development should not create increased risk due to ill-conceived proposals</p>
Officer Response	<p>The Proposed Modification is considered necessary to ensure the Plan accords with national policy to significantly boost the supply of housing.</p> <p>Criterion xiii of Policy BW4 requires development proposals to "<i>Contribute to infrastructure needed to make the development acceptable in planning terms</i>" and the need for early engagement with the NHS Integrated Care Board is highlighted in paragraph 14.25.</p> <p>Criteria iii to vii of Policy BW4 in the Proposed Submission Plan have been prepared with the input of Hampshire County Council as Highway Authority to address the potential traffic and road safety impacts of the proposed development and, apart from the to the amendment to criterion vii set out in MM88, the Highways authority is content with the Local Plan approach. Therefore it is considered that the development can be delivered in a sae an appropriate manner.</p> <p>Therefore MM88 is considered appropriate and no further change is considered necessary.</p>

MM89 (Market Towns – New Alresford)

MM2040 51 - Mr NEIL BARBER

Name	Mr NEIL BARBER
Representor Number	MM2040 51
Representation Number	MM2040 51-2
Representation Summary	This representation has been incorrectly entered twice by the user against MM89 (New Alresford) and MM88 (Bishops Waltham). Please see the response to MM88.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>A) The removal of the restriction for planning, where it was not be considered prior to 2030. This should remain until Bishops Waltham infrastructure is sufficiently developed and can be seen to be robust. For example; doctor availability is still problematic and to burdn them further can only make the situation more difficult. Also despite additional parking being provided at the Jubilee Hall, traffic within the main street and surrounding roads is overburdened and can only get worse with additional traffic that would inevitably be)generated.</p> <p>2) The proposed access on Hoe Road to the development will create an accident black spot. It's proximity to the bend in Hoe Road, Rareridge Lane and entrances to the existing properties not safe. Even a reduction in the speed limit on Hoe Road does not mean all drivers will observe it. The development should not create increased risk due to ill-conceived proposals,.</p>
Officer Response	This representation has been incorrectly entered twice by the user against MM89 (New Alresford) and MM88 (Bishops Waltham). Please see the response to MM88.

MM90 (Policy NA1)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-7
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion. Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p> <p>It includes the following text –<i>In delivering the district's housing, employment and community requirements development proposals will be expected, where appropriate, to:x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.</i></p>

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.34 in the supporting text to this policy already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion. This will not apply to any development which comes forward under existing outline consents’.*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that the development falls within and identifies whether it is at capacity.

MM91 (Policy NA2)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-8
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage. Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion. Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p> <p>It includes the following text –<i>In delivering the district's housing, employment and community requirements development proposals will be expected, where appropriate, to: x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.</i></p>

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.41 in supporting text already states - ‘*This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion. This will not apply to any development which comes forward under existing outline consents.*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-10

Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	<p>Support welcomed.</p>

MM92 (Policy NA3)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-9
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion.</p> <p>Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p>

It includes the following text –*In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to: x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.*

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.43 in the supporting text to this policy already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion.’*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

MM93 (Larger Rural Settlements – Colden Common)

Consultation Point Summary:

Mr Sprott suggests additional wording in MM20405-1

MM2040 5 - Cllr Andrew Sprott

Name	Cllr Andrew Sprott
Representor Number	MM2040 5
Representation Number	MM2040 5-1
Representation Summary	<p>The representation suggested the following change:</p> <p>"If the New Alresford Neighbourhood Plan does not successfully go through to andpass a referendum by [insert date OR stage of Winchester District Local Plan process], the housing requirement of 100 dwellings will be addressed in the early Local Plan review."</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>In September 2025, New Alresford Town Council announced that the emerging New Alresford Neighbourhood Plan would be delayed by twelve months. This raises concerns in relation to the NDP's eventual delivery date.</p> <p>There are concerns within the Alresford community in relation to the process under which the NDP is being written and its likely content and omissions. Together, these issues raise the question whether the NDP will pass a referendum. Therefore, I would suggest that the new sentence beneath the last criteria should require that the NDP not only goes through to a referendum, but that it should also pass it and that it must do so within a set timeframe. That might either be by reference to a set date or determined by reference to a stage in the Local Plan process.</p> <p>For example:</p> <p>"If the New Alresford Neighbourhood Plan does not successfully go through to andpass a referendum by [insert date OR stage of Winchester District Local Plan process], the housing requirement of 100 dwellings will be addressed in the early Local Plan review."</p>

Officer Response	Disagree. The wording is considered to be clear as it includes the word 'successfully' - the changes to the wording are not required for the purposes of soundness.
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MM96 (Policy CC4)

MM2040 47 - The Clay Family

Name	Mr Andrew Partridge
Representor Number	MM2040 47
Representation Number	MM2040 47-1
Representation Summary	<p>Support deletion of paragraph 14.80 which will provide clarity to the policy.</p> <p>Support removal of Nature and Phasing paragraph which brings the policy in line with the NPPF and creates consistency across the plan.</p> <p>Amended policy is considered to be sound, being consistent with national policy, effective and flexible.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The deletion of paragraph 14.80 is welcomed because it provides clarity.</p> <p>The deletion of the Nature and Phasing of development para.is strongly supported. It provides consistency with NPPF (Please see comments on the deletion of Phasing under H2) and across the plan.</p> <p>It is considered that the policy as amended is sound with this change as it is consistent with national policy, effective and flexible.</p>
Officer Response	Support welcomed.

MM2040 55 - Environment Agency

Name	Environment Agency
Representor Number	MM2040 55
Representation Number	MM2040 55-11

Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>We are satisfied with the modifications proposed which relate to our comments.</p> <p>EA comments - MM Redacted.pdf</p>
Officer Response	<p>Support welcomed.</p>

MM97 (Larger Rural Settlements – Denmead)

MM2040 9 - Mr Tom Hutchinson

Name	Mr Tom Hutchinson
Representor Number	MM2040 9
Representation Number	MM2040 9-1
Representation Summary	<p>The reduction to just 100 new dwellings is arbitrary, particularly as the removal of phasing (via MM50) enables delivery from the start of the plan period and coincides with more widespread availability of nutrient mitigation solutions. There is no robust justification for downscaling the requirement.</p> <p>The table gives the impression that 100 dwellings is a cap or fixed requirement, rather than a minimum to be met or exceeded through the Neighbourhood Plan. This may constrain plan-making and local delivery unnecessarily.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The revised table reduces the total housing provision for Denmead from 328 dwellings (2020–2040) to 200 dwellings (2024–2040) and stipulates that only 100 new dwellings are to be allocated through the Denmead Neighbourhood Plan (DNP). This reduction is not supported by updated evidence and undermines Denmead’s strategic role as a larger rural settlement identified for sustainable growth within the spatial hierarchy.</p> <p>Earlier iterations of the Local Plan and supporting evidence (including Submission Plan paragraph 14.83) confirmed that Denmead had capacity for 160–360 dwellings over the plan period, including commitments, completions, and new allocations. The reduction to just 100 new dwellings is arbitrary, particularly as the removal of phasing (via MM50) enables delivery from the start of the plan period and coincides with more widespread availability of nutrient mitigation solutions. There is no robust justification for downscaling the requirement.</p> <p>Furthermore, the table gives the impression that 100 dwellings is a cap or fixed requirement, rather than a minimum to be met or exceeded through the Neighbourhood Plan. This may constrain plan-making and local delivery unnecessarily.</p> <p>Requested changes:</p> <p>Amend MM97 to read:</p>

	<p>“New sites to be allocated in DNP Review (Policy D1): minimum of 100 dwellings”</p> <p>Justification:</p> <ul style="list-style-type: none"> · Ensures the allocation reflects Denmead’s strategic role and services as a larger rural settlement; · Provides flexibility and positively prepared guidance to the Neighbourhood Plan process; · Recognises the uplifted delivery potential resulting from the removal of phasing (MM50) and nutrient mitigation options; · Maintains consistency with prior versions of the Plan and original evidence base; · Aligns with NPPF objectives (paragraphs 11c, 29, and 60) to significantly boost housing supply and empower communities.
<p>Officer Response</p>	<p>Disagree. The allocation of 100 dwellings in Denmead in this Local Plan is supported by the evidence base that has informed the Site Selection work. This level of development is comparable with other settlements which have a similar range of services and facilities. Like other site allocations in this Local Plan, it is not a cap.</p>

MM98 (Policy DEN1)

MM2040 10 - Mr Tom Hutchinson

Name	Mr Tom Hutchinson
Representor Number	MM2040 10
Representation Number	MM2040 10-1
Representation Summary	<p>MM98 does not go far enough in clarifying how the Neighbourhood Plan should interpret the revised housing figure. In its current form, the policy may be misread as setting a cap, thereby deterring the community from pursuing higher allocations that would support the village's role, housing choice, and service viability.</p> <p>The Neighbourhood Plan is encouraged to identify additional allocations above this minimum where supported by local evidence and where environmental constraints, including nutrient neutrality, can be satisfactorily addressed.</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Policy DEN1, as amended, confirms a housing requirement of “about 100 dwellings” to be allocated in the Denmead Neighbourhood Plan. This figure reflects a substantial reduction from the level of growth previously indicated in earlier Plan versions (200–300 dwellings), and there is no evidence presented to demonstrate that Denmead’s capacity or strategic function has changed.</p> <p>While the deletion of the phasing restriction (previously in Policy H2) is welcomed, MM98 does not go far enough in clarifying how the Neighbourhood Plan should interpret the revised housing figure. In its current form, the policy may be misread as setting a cap, thereby deterring the community from pursuing higher allocations that would support the village’s role, housing choice, and service viability.</p> <p>It is essential that the policy encourages a positively prepared approach – one that enables delivery of at least 100 dwellings - and supports the identification of further allocations where justified by local evidence and deliverable in environmental terms.</p> <p>Requested changes:</p> <p>Amend the Policy DEN1 wording as follows:</p>

	<p>“Land will be allocated for development in the Denmead Neighbourhood Plan for a minimum of 100 dwellings, including any required amendments to the settlement boundary. The Neighbourhood Plan is encouraged to identify additional allocations above this minimum where supported by local evidence and where environmental constraints, including nutrient neutrality, can be satisfactorily addressed.”</p> <p>Add supporting text to clarify:</p> <p>“The deletion of phasing through MM50 means that housing allocations in Denmead can be delivered at any point during the plan period, subject to planning permission and necessary mitigation. The figure of 100 dwellings is a minimum requirement. The Neighbourhood Plan may allocate more if justified by local need, site capacity, and environmental considerations.”</p> <p>Justification:</p> <ul style="list-style-type: none"> · Provides policy clarity and flexibility for the neighbourhood planning process; · Aligns with NPPF para 29 (Neighbourhood Plans should shape and direct sustainable development in their area); · Reinforces Winchester’s strategic objective to boost housing delivery in sustainable rural settlements; · Avoids artificial constraints while respecting environmental limits and local character; · Ensures Policy DEN1 remains positively prepared, effective, and consistent with national policy.
<p>Officer Response</p>	<p>Disagree. The wording of Policy DEN1, like all other allocations in the Local Plan, does not set a cap. The 100 dwellings that has been allocated to Denmead in this emerging Local Plan is related to its position in the Settlement Hierarchy. The level of development in Denmead in this Local Plan is comparable with other settlements that are of a similar size and have the same level of facilities.</p>

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

<p>Name</p>	<p>NHS Hampshire and Isle of Wight Integrated Care Board</p>
<p>Representor Number</p>	<p>MM2040 15</p>
<p>Representation Number</p>	<p>MM2040 15-10</p>
<p>Representation Summary</p>	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>

<p>Full Representation</p>	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to “physical and social infrastructure” have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p><u>ICB Winchester LP Main Modifications Response Final_Redacted.pdf</u></p>
<p>Officer Response</p>	<p>Disagree with explicitly including health infrastructure in the criterion.</p> <p>Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p> <p>It includes the following text –<i>In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to:x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.</i></p> <p>Paragraph 3.8 of the supporting text is followed by the following – <i>Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.</i></p> <p>Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.86 in the supporting text to this policy already states - <i>‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion.’</i></p>

	<p>The Infrastructure Delivery Plan was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –</p> <p><i>The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion.</i></p> <p>In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.</p>
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MM2040 48 - Bewley Homes

Name	Mr Sam Roach
Representor Number	MM2040 48
Representation Number	MM2040 48-4
Representation Summary	<ul style="list-style-type: none"> • Concern about the wording of Main Modifications relating to the Denmead Neighbourhood Plan. • The current wording lacks certainty and fails to take into account what would happen if the NP was not adopted/progressed. • There is concern that without clearer mechanisms, the identified housing contribution of 100 dwellings might not be delivered, creating uncertainty for stakeholders and potentially undermining the housing strategy. <p>Recommended change to the wording:</p> <p>“If the Denmead Neighbourhood Plan does not successfully go through to a referendum, the housing requirement of 100 dwellings will be addressed in the early Local Plan review. If the Local Plan Review and the Neighbourhood Plan is not progressed in line with the requirements of Policy SP2 then speculative applications on sites outside of the settlement boundary within Denmead should be encouraged. ”</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>After reviewing the representation, which was previously attributed to MM1 (Foreword), officers have determined that it more appropriately relates to MM98 and have therefore moved the comment accordingly.</p> <p><u>Denmead Neighbourhood Plan and the Identified 100 Dwelling Requirement</u></p> <p>We have specific concerns with the wording of the Main Modifications relating to the Denmead Neighbourhood Plan. The modifications state that:</p> <p>“If the Denmead Neighbourhood Plan does not successfully go through to a referendum, the housing requirement of 100 dwellings will be addressed in the early Local Plan review.”</p> <p>This wording does not provide sufficient certainty or commitment. It fails to address the scenario in which both the Winchester City Local Plan Review and the Denmead Neighbourhood Plan fail to be adopted or are delayed significantly.</p> <p>In these circumstances, there is no clear mechanism to ensure that the defined quantum of 100 dwellings will be delivered, nor is there clarity on where or how this requirement would be redistributed. This creates uncertainty for communities, landowners and decision-makers and risks the loss of a clearly identified housing contribution.</p> <p>We therefore urge that the Main Modifications are strengthened to:</p> <p>Explicitly confirm that the 100-dwelling requirement remains a firm and binding component of the overall housing strategy; and Clearly set out how this requirement will be addressed, including alternative delivery mechanisms, should either or both plans fail to progress.</p> <p>Such clarity is essential to ensure the Plan is effective and deliverable and to ensure the Local Plan is sound. See below for the proposed changes to the wording to remedy this soundness issue.</p> <p>“If the Denmead Neighbourhood Plan does not successfully go through to a referendum, the housing requirement of 100 dwellings will be addressed in the early Local Plan review. If the Local Plan Review and the Neighbourhood Plan is not progressed in line with the requirements of Policy SP2 then speculative applications on sites outside of the settlement boundary within Denmead should be encouraged. ”</p> <p>Supporting Information</p> <p>1. Winchester Main Modifications - Reps - Sam Roach.pdf</p>
<p>Officer Response</p>	<p>Disagree. MM98 clearly identifies what would happen in the event that the Denmead NP is not progressed. The proposed changes to the wording of DEN1 would not add the necessary level of clarity, precision or certainty that is required in a Local Plan policy.</p>

MM100 (Policy KW2)

MM2040 29 - Historic England

Name	Mr Guy Robinson
Representor Number	MM2040 29
Representation Number	MM2040 29-6
Representation Summary	<p>Comment - request further changes :</p> <p>"Conservation areas and several listed buildings lie to the south and east of the site, in Kings Worthy and Abbots Worthy, and development should be designed to avoid harmful impacts on their significance through development in their setting and the National Park."</p>
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>It would be better to stay focused on significance. Might the following revised wording be included?</p> <p>"Conservation areas and several listed buildings lie to the south and east of the site, in Kings Worthy and Abbots Worthy, and development should be designed to avoid harmful impacts on their significance through development in their setting and the National Park."</p> <p>Supporting Information</p> <p>1. Historic England - 20260115_Winchester_LP_mainmods_consultation_GRHE_response_Redacted.pdf</p>
Officer Response	Disagree- the Council does not consider this amendment is necessary, as the matter of 'significance' is covered by other policies in the local plan in particular Policy HE5 and the local plan should be read as a whole.

MM102 (Policy SW1)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-2
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion.</p> <p>Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p>

It includes the following text –*In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to: x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.*

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.107 in the supporting text already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion. This will not apply to any development which comes forward under existing outline consents’.*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion. This will not apply to any development which comes forward under existing outline consents’

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

MM104 (Policy WK1)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-12
Representation Summary	<p>The response criticises MM104 for lacking explicit infrastructure requirements, particularly healthcare provisions, which the respondent believes undermines the plan's soundness and deliverability. ## Key Themes #### Policy Inconsistency</p> <p>The respondent highlights inconsistency between MM104 (Winchester Road Housing and Open Space Allocation) and other site allocation policies, noting that MM104 lacks explicit infrastructure provision requirements.</p> <p>The respondent argues that without explicit wording regarding infrastructure requirements, the plan's soundness and deliverability are undermined, creating a "material risk" that necessary healthcare infrastructure won't be secured.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>In addition, MM104 (Policy WK1 Winchester Road Housing and Open Space Allocation) does not include any explicit requirement for infrastructure provision to make the development acceptable in planning terms. This is inconsistent with other site allocation policies and should be rectified, including clear reference to health infrastructure where required.</p> <p>Without explicit wording, there is a material risk that necessary healthcare infrastructure will not be secured through the planning process, undermining the soundness and deliverability of the Plan.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree.</p> <p>The ICB response highlights that there is no reference to infrastructure required for site WK1 (Winchester Road Housing and Open Space Allocation). In this instance, the housing has all been built out under this carried forward policy, which has been retained simply to deliver the associated open space – hence it would not be appropriate to include such a reference in Policy WK1.</p>

MM105 (Policy WK3)

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-5
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Full agreement with these modifications</p>
Officer Response	Support noted.

MM2040 28 - Wickham Residents Association

Name	Mr Geoffrey Burton
Representor Number	MM2040 28
Representation Number	MM2040 28-6
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The revisions to the plan on page 459 and the text in the MM are confusing and could give the impression that the Settlement Gap between Wickham/Knowle and Welborne is being reduced.</p>

	<p>The plan should be revised to show the full extent of the Settlement Gap which should be identical to the map within Winchester City Council's Settlement Gap Review dated July 2024 with the areas of the Welborne Open Space highlighted within the Settlement Gap.</p> <p>The text should be revised to reflect that fact that the Welborne Open Space is part of the Settlement Gap.</p>
Officer Response	<p>Disagree that the maps on page 459 should be amended to show the Settlement Gap. this would be inconsistent with the rest of the Plan, which does not include Settlement Gaps in the inset maps for each settlement (e.g. page 392) the Settlement Gaps are defined on the Policies Map.</p> <p>However, the supporting text could be clarified to make it clearer that the areas covered by Policy WK3 and the Wickham-Knowle-Welborne gap in policy NE7 are not the same.</p> <p>Proposed Additional Modification as follows -</p> <p>14.116 Policy WK3 below sets out the planning framework for the areas within Winchester district identified as having potential to deliver green infrastructure as part of the Welborne development. <u>These two parcels of land fall within a much larger area identified as a Settlement Gap under Policy NE7.</u></p>

MM2040 31 - Bargate Homes and Macra Ltd

Name	Adam Bennett
Representor Number	MM2040 31
Representation Number	MM2040 31-2
Representation Summary	<p>Support reduction in of area covered by policy to Knowle Triangle and Dashwood.</p> <p>Support proposed modification to para. 14.115.</p> <p>Considers the name of the policy should be amended to reflect that land identified will contribute to recreational opportunities for the public as a whole and which is determined important to remain 'open' to maintain the separate identities principally of Knowle and Welborne given its location.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>(2) Main Modification MM105 – Policy WK3 Welborne Open Space Detailed submissions were made to the Local Plan Examination Hearing Sessions in respect of Policy WK3 and its intention to seek to designate large areas of land as 'open space', per the description of the policy, to service Welborne Garden Village.</p>

As was pointed out to the Inspector at the time of the examination however, and has been accepted within document ED38a, there was no evidence that the landowner parties whom control the majority of the areas of land included within the scope of this policy were willing to bring the land forwards for such purposes and in any event, there was little evidence or justification that there was a need for this land to be made available for such purpose bearing in mind that The Welborne Plan (2015) set out clear the expectations in terms of publicly accessible greenspace for both recreational amenity and mitigation to form a cohesive part of the development, within the scope of its policies and also clearly defined at Policies WEL5 and WEL29 the extent of the 'settlement gaps' which were proposed to Wickham and Knowle to ensure their separate identities were maintained.

The Inspector has been clear within document ED38a of the acceptance that some green infrastructure and open space is committed to be delivered at 'Knowle Triangle' and 'Dashwood', being those areas which the policy is now intended to be limited to, but that the broader original intended scope of the policy was simply unjustified as there was no clear evidence that land beyond those two parcels would be brought forwards for such purposes for use in association with Welborne Garden Village or indeed made available to the public.

A Main Modification has been specifically sought by the Inspector in this regard which the Council have reflected through the proposed change to Policy WK3 which reduces the extent of the land intended to be captured from 210 hectares to a total of 61 hectares and indeed is limited to 'Knowle Triangle' (22ha) and 'Dashwood' (38ha).

We specifically support the reduced scope of the policy, omitting the land otherwise previously included for which there was no evidence of delivery or commitment from landowners to bring this forward for such purposes.

There was in our view a policy rub between the wording of the supporting text to Policy WK3 with respect to the doubling up that occurs with Policy NE7 - Settlement Gaps. There is no need for Policy WK3 to also infer that the land captured within the scope of its policy was required to define the extent of land to remain open and preserve a gap between Knowle/Wickham/Welborne. This has been acknowledged by the Council through the proposed amendment to Paragraph 14.115 of the policy text and we support the modification proposed in this regard.

We ask that consideration is given to whether the name of the policy be amended to reflect the fact that the land areas now proposed to be captured by the policy are not in their nature 'open space' specifically delivered for the purposes of meeting the recreational needs of Welborne Garden Village, which are covered within the scope of The Welborne Plan (2015), but rather land which will contribute to recreational opportunities for the public as a whole and which is determined important to remain 'open' to maintain the separate identities principally of Knowle and Welborne given its location. As previously discussed, the Welborne Garden Village development includes specifically the land required to meet its recreational needs within the extent of the allocation without the need to rely specifically on additional land, hence the description of the policy as set out is inaccurate in the respect and does not provide clarity for the public as to the role of this land.

[Main Modifications Response - KPPC - Bargate Homes and Macra Ltd.pdf](#)

Officer Response	<p>Changing the name of the policy at this stage is considered unnecessary and potentially confusing. Therefore the proposed revision is not agreed with.</p> <p>However, an additional modification setting out some further minor revisions to paras. 14.115 ad 14.116 is considered appropriate to confirm that the areas covered by policies WK3 and NE7 are not the same. They are outlined in the response to representation 204028-6 (Wickham Residents' Association).</p>
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MM2040 34 - Graham Moyse

Name	Jacob Goodenough
Representor Number	MM2040 34
Representation Number	MM2040 34-1
Representation Summary	<p>Objection raised in response to reduction in area covered by WK3 on the policies map (Proposed Change 5). It has been reproduced in MM105 to ensure the representation is clearly addressed in this summary and response.</p> <p>Object to inclusion of small part of land which falls with the area identified as the "Knowle Triangle" on Page 22 of the 2015 Welborne Plan. This land is in separate ownership and has not been included in the green infrastructure for Welborne in the subsequent 2021 planning permission for Welborne, or the planning application for Ravenswood in 2018. Maps provided.</p> <p>States the land is not available for green infrastructure and as the cited applications for Welborne and Ravenswood do not include this site it should be excluded from allocation WK3 (and NE7) so it can contribute towards housing supply.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>This written representation is prepared specifically in response to the 'Proposed Changes to the Policies Map' consultation document (ED41d). At Proposed Change 5, this sets out revisions to the Policies Map relating to Policy WK3 – Welborne Open Space, in response to Main Modification MM105 and the Inspector Note (ED38a). As part of Proposed Change 5, our client's land at Dean Villas is still shown forming part of the Welborne Open Space (shaded in green), which our client considers to be erroneous for the reasons set out in this letter. This representation also considers consequential changes to the Settlement Boundary for Knowle and the Settlement Gap (Policy NE7) in this location.</p> <p>WCC's 'Supplementary Note to the Proposed Changes to the Policies Map (ED41d)' explains that Proposed Change 5 reduces the area covered by Policy WK3 in line with the area identified as having a potential role as Green Infrastructure on page 22 of The Welborne Plan. The 'Final Schedule of Proposed Main Modifications' consultation document (ED41a) sets out the revised wording to Paragraphs 14.115 and 14.116 of the emerging Local Plan. These paragraphs state that Policy WK3 provides the planning framework for the areas within Winchester District identified</p>

as having potential to deliver Green Infrastructure as part of the Welborne development, and that the purpose of the 'green buffers' is to ensure that Welborne does not coalesce with Wickham or Knowle. The paragraphs also state that the overriding requirement is to retain the open rural nature of this land and to prevent changes that would urbanise its undeveloped character.

It is acknowledged that our client's land at Deans Villas does form part of the 'Land within Winchester CC with potential role as Green Infrastructure' (hatched in green), as identified in Fareham Borough Council's Local Plan Part 3 – The Welborne Plan adopted in June 2015. However, our client's land is not available for this use. Notwithstanding this, in preparing this written representation, we have reviewed the subsequent planning permission for the Welborne site (Fareham BC Reference Number P/17/0266/OA granted on 30th September 2021). The approved 'Application Boundary Parameter Plan' (Drawing Number 60469153-001-A0), as listed in Condition 2 of the planning permission, is enclosed with this submission for reference. This plan confirms that, despite being identified in The Welborne Plan in June 2015, our client's land at Dean Villas does not lie within the red-line boundary for the subsequent 2021 permission, and also does not form part of the blue-edged land identified as being within the outline applicant's ownership. This confirms that our client's land at Dean Villas was therefore ultimately not required, and is not relied upon, to form part of the Welborne Green Infrastructure Strategy approved in 2021.

Further to the above, we have also reviewed the nearby planning application for Land North of Ravenswood House, Mayles Lane, Knowle (WCC Reference Number 18/01612/OUT) and enclose a copy of the Site Location Plan (Drawing Number A090070-453 SLP-01 Rev A) for this application. This plan outlines in blue the additional land under the control of the applicant, which includes the land immediately to the east of our client's land at Dean Villas but does not include our client's site itself. The Officer's Report for this outline planning permission (also attached for reference) confirms that the land immediately to the east of our client's site is known as 'the Knowle Triangle' and describes this land as providing "an opportunity to act as a defensible physical and visual gap between the existing village of Knowle and the proposed Welborne development." The Officer's Report confirms that the Knowle Triangle will be transferred to the ownership of Wickham Parish Council as public open space to be safeguarded for the long-term thereby fulfilling both the requirements of Policy WK3 and NE7. Therefore, our client's land at Dean Villas is also not required as part of the Green Infrastructure Strategy for this development either (albeit it is not available for this use).

Against the above background, the continued inclusion of our client's land at Dean Villas within Policy WK3 is no longer necessary or justified. It appears that a blanket approach has been taken to the area of land to the south-east of Knowle proposed to still be included within Policy WK3, based on The Welborne Plan adopted over ten years ago in 2015. However, the more recent permission for Welborne (2021) and application at Ravenswood House (2018) should supersede the provisions of The Welborne Plan and be given more weight. On this basis, our client's land at Dean Villas should be removed from Policy WK3 as it does not form part of the Green Infrastructure Strategy for Welborne and also does not form part of the Knowle Triangle public open space included as part of the Ravenswood House planning application. It has clearly been established through the local planning

	<p>history in this area that our client’s land at Dean Villas does not have ‘a potential role as Green Infrastructure’ for either of these sites and the land is not available for this use.</p> <p>Instead, the settlement boundary for Knowle should be amended to include our client’s land at Dean Villas and follow its eastern boundary, which would logically ‘round off’ the settlement in this location. A corresponding change to the extent of the settlement gap under Policy NE7 should also be made. This would create opportunities for small-scale windfall development of the nature envisaged by the Plan to help maintain a robust housing land supply. This amendment would still ensure that the Knowle Triangle remains within Policy WK3 and Policy NE7, allowing this parcel of land to provide the identified ‘green buffer’ function set out in the revised wording for Paragraphs 14.115 and 14.116 of the emerging Local Plan, and ensure that Welborne does not coalesce with Knowle, as confirmed in the Ravenswood House Officer’s Report.</p> <p>The above amendment will also ensure that the emerging Local Plan is consistent with the relevant provisions of the NPPF (2024). In particular, Paragraph 127 of the NPPF states:“Planning policies and decisions need to reflect the changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p> <p>a) It should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped)...”</p> <p>In accordance with Paragraph 127 of the NPPF, the current review of the Winchester Local Plan represents an appropriate opportunity to acknowledge the changed demand for our client’s land at Dean Villas (since it was identified in 2015). The local planning history for Welborne and Ravenswood House confirms that there is, in fact, no need for our client’s site to provide Green Infrastructure in association with these developments and there is no reasonable prospect of a planning application coming forward to use the Dean Villas site for Green Infrastructure, as an appropriate strategy has been identified for both developments using alternative land. In addition, our client’s site is not available for this use. It should therefore be excluded from Policy WK3 and Policy NE7 and, as a minimum, incorporated into the Knowle urban area, where it would create opportunities for small-scale windfall development of the type envisaged by the Local Plan to maintain housing land supply. In support of this, our response to WCC’s recent Call for Sites 2025 confirms that the site is capable of delivering 5 to 7 dwellings in the short-term period (0-5 years).</p> <p><u>WCC LP Proposed Mods Repts - Dean Villas - January 2026 - NOVA planning_Redacted.pdf</u></p>
<p>Officer Response</p>	<p>It is accepted that Planning Permission P/17/0266/OA for Welborne granted on 30th September 2021 by Fareham BC does not include this land. However, at this stage in the Welborne project the adopted Welborne Plan remains an appropriate basis for identifying land which could be required for green infrastructure.</p> <p>It would not be appropriate at this point in the Winchester Local Plan process to exclude this site from the settlement gap without evidence</p>

	On balance, it is considered that the site should remain within the revised boundary of allocation WK3 (Welborne Open Space). The site has been submitted to the recent 2025 SHELAA consultation, and its relative merits for housing development, including its value as potential open space and the contribution it makes to the settlement gap, should be considered as part of that process leading into the next Local Plan.
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MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-3
Representation Summary	Requests that the Local Plan makes clear that the land referred in Policy WK3 is understood to be community open space within the settlement gap in the parish of Wickham and Knowle and therefore under the planning control of WCC.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The Knowle Triangle is land within the Parish of Wickham and Knowle and has been allocated as community open space to ensure the buffer between Knowle and Welborne is maintained. The two elements of the Welborne Open Space (the Knowle Triangle and Dashwood) are included within the settlement gap. WKPC acknowledges that within Fareham Borough Council plan for Welborne these two parcels are designated as a buffer between Knowle and Welborne and supports that designation but requests that the Local Plan makes clear that the land referred to is understood to be community open space within the settlement gap in the parish of Wickham and Knowle and therefore under the planning control of WCC.</p>
Officer Response	<p>It is considered that para. 14.115 does make it clear that the land in question falls within Winchester District.</p> <p>However, the supporting text could be clarified to make it clearer that the areas covered by Policy WK3 and the Wickham-Knowle-Welborne gap in policy NE7 are not the same. See response to MM2024028-6 (Wickham Residents association) for proposed additional modification.</p>

MM106 (Policy WK5)

MM2040 28 - Wickham Residents Association

Name	Mr Geoffrey Burton
Representor Number	MM2040 28
Representation Number	MM2040 28-3
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The nature and phasing of this piece of land in Mill Lane should be reinstated as the Inspector by deleting the Phasing has ignored the primary reason for this land in Wickham to be developed after 2030. The reason for deleying this development until after 2030 was because the primary infrastructure in Welborne including a Doctors' Surgery, School and Community facilities would not be complete until after 2029. Wickham is having to provide these facilities and has agreed to provide these for the first 690 dwellings in Welborne. The Doctor's Surgery for example will be at full capacity once it takes patients from these 690 dwellings and not have the capacity to take the residents from this site in Mill Lane.</p>
Officer Response	This modification is considered appropriate to ensure the Plan accords with national policy to significantly boost the supply of housing. Criterion xiii of Policy WK5 requires development proposals to " <i>contribute to infrastructure needed to make the development acceptable in planning terms</i> " and this will be considered at the time any planning application is brought forward.

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-2

Representation Summary	<ul style="list-style-type: none"> • Ongoing concerns about flooding impacts in Wickham with existing and proposed developments. They reference a recent flood risk assessment report that needs reviewing and cite historical flooding problems related to ageing infrastructure under pressure from new housing developments. • Supports the modification but emphasises the need for caution, referencing a recent Appeal Decision that recommends a "precautionary approach" given the "clear history of foul water flooding" in Wickham. • Highlights the 2015 "Wickham Flood Investigation Report" which recommended that no further development occur before implementing mitigating measures to prevent future flooding.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>WKPC remain concerned about the impact of flooding on Wickham with the new and proposed developments. The most recent flood risk assessment report should be reviewed (see comments under MM7)</p> <p>WKPC supports this modification. In doing so draws attention to the Appeal Decision re 24/02803/FUL which states: "Given the clear history of foul water flooding that has occurred around Wickham, which appears to relate to the cumulative pressures placed on aging infrastructure through new housing development, I find that a precautionary approach is required."</p> <p>WKPC expects this to weigh heavily in the conditions for approval of this and any development in Wickham including an update to the most recent flood risk assessment report. This review should be cognizant of and update the "Wickham Flood Investigation Report" commissioned by HCC and published 10th March, 2015, conducted by Atkins Ltd. It is important to note that this report stated that no further development should take place in Wickham before mitigating steps had been carried out to prevent future flooding – but no such steps have been undertaken.</p>
Officer Response	<p>Comments noted. The Local Lead Flood Authority have been fully engaged with the drafting of the wording of this site allocation and they will be providing comments on the planning application when it is submitted.</p>

MM2040 43 - Bloor Homes Limited

Name	Mr Harvey Wingfield
Representor Number	MM2040 43

Representation Number	MM2040 43-8
Representation Summary	Support removal of phasing. Support amendment to criterion ix.. Object to criterion v as consider this is already addressed in criterion ii.
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p><u>Reasoning:</u></p> <p>We support the removal of the requirement for ‘the development to be phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030’. We also support the addition of the wording ‘unless modelling/evidence demonstrates otherwise’ to Criterion ix.</p> <p>Do not consider Criterion v to be necessary, as Criterion ii seeks to ensure the site is well connected to the surrounding area by sustainable transport modes. Criterion v should be removed.</p> <p><u>Proposed change:</u></p> <p>Remove criterion v: Safe and convenient pedestrian access through to Houghton Way and on to Wickham Centre.</p>
Officer Response	<p>Support is noted.</p> <p>The proposed amendment to criterion v is considered necessary to increase flexibility. But the aim to secure safe and convenient pedestrian access through to Wickham centre is considered essential and should be specifically highlighted in the policy.</p> <p>Therefore disagree with proposal to delete criterion.</p>

MM107 (Policy WK6)

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-6
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Consistent with comments re "Settlement Gaps" the site at Mill Lane is not favoured by residents. the Parish Council and is unsuitable for development (narrow rural access, country lane that is meant in the plan to be protected, single file traffic, no public transport, countryside). The inspector has apparently accepted this site but it should not proceed. A section of the settlement gap to the south of the village is a preferred option.</p>
Officer Response	<p>The Council's reasons for the selection of this site are set out in the Development Strategy and Site Selection Topic Paper (SD10b) and the Wickham Site Selection Background Paper (SD10j). The Council still considers this site is preferable to other alternatives including one suggested.</p> <p>Therefore no change considered appropriate.</p>

MM2040 28 - Wickham Residents Association

Name	Mr Geoffrey Burton
Representor Number	MM2040 28
Representation Number	MM2040 28-5
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p>

	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Our comments for this site are the same as the site in Mill Lane in MM106.</p> <p>The inspector by deleting the phasing has ingorned the primary reason for the phasing being the fact that Wickham is providing primary infrastructure for Welborne upto 2029.</p> <p>The phasing after 2030 should be reinstated.</p>
<p>Officer Response</p>	<p>The Proposed Modification is considered necessary to ensure the Plan accords with national policy to significantly boost the supply of housing.</p> <p>Criterion xiv of Policy WK6 requires development proposals to "<i>Contribute to infrastructure needed to make the development acceptable in planning terms</i>". Planning approval for the development of this site was received on appeal in November 2025, though it is considered appropriate that this policy remains in place until the site is built out.</p> <p>Disagree that the phasing after 2030 should be reinstated.</p>

MM108 (Larger Rural Settlements – Wickham and Knowle)

MM2040 14 - mr Nicol Holladay

Name	mr Nicol Holladay
Representor Number	MM2040 14
Representation Number	MM2040 14-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The Appeal Inspector for a planning application for this site made clear that flood risks should also be considered: Suggest add: "Flood risk assessment should be professionally and independently assessed and necessary remedial action completed before any development commences". Reason: demonstrable flood risk and contamination into the River Moon</p>
Officer Response	Do not agree a change is necessary. This modification refers to housing sources in Knowle. The only proposed allocation in Knowle is Ravenswood (KN1). It is considered that the risk of any potential flooding and / or contamination to the River Meon or other watercourses are appropriately addressed in Policy NE6.

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-8
Representation Summary	Object as the Knowle Triangle should not be designated as Welborne Open Space as it is an integral part of the community led development at Knowle. Concerns over the status and progress of the outstanding s106 agreement associated with the Ravenswood application. Considers the Ravenswood allocation should be removed from the Plan until there is clarity over how this proposal can be progressed and confirm there remains community support.

<p>Full Representation</p>	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>As per comments against MM84</p> <p>WKPC has made separate representations regarding this section re “Remaining Rural Areas” specifically with regards to Knowle. The substance of that representation is reproduced below:</p> <p>In the 2024 Winchester Local Plan submitted to the Planning Inspectorate, Knowle Village was allocated provision for 200 dwellings. This allocation was made notwithstanding Winchester City Council’s own hierarchy settlement facility scoring methodology, under which Knowle Village would have been allocated zero dwellings due to the absence of public transport, local schooling, and essential services e.g. fresh food shops that can meet the daily needs of residents.</p> <p>The inclusion of the Knowle Village site was predicated solely on its designation as a community-led development. This designation was conditional upon the transfer, by way of gift, of specified parcels of land to the Parish Council, namely the Knowle Village Triangle and the Knowle Village Water Meadows, together with the provision of a commuted sum totalling £670,000.</p> <p>The commuted sum comprises: £250,000 towards community land mitigation works (currently being finalised with Wickham & Knowle Parish Council’s appointed mitigation landscape consultant, Deacon Design; £160,000 for the ongoing maintenance of community land; and £260,000 as a contribution towards a community building.</p> <p>These obligations were to be secured by a Section 106 agreement; a copy of the latest draft agreement can be provided.</p> <p>The gifted land was intended to form a designated strategic gap between Fareham and Winchester, particularly in light of the proposed development of approximately 6,000 dwellings at the settlement known as Welborne Village, located on the boundary of Knowle Village. The Parish Council has been actively seeking to progress and execute the Section 106 agreement for several months.</p> <p>However, the Local Plan has incorrectly defined the land promised to the Parish as part of this community-led development and detailed within the Section 106 agreement as “Welborne Open Space.” This designation is erroneous. The land in question is located within Knowle Village Parish and constitutes an integral element of the community-led development in Knowle Village. There is no planning or policy justification for land associated with a development in Knowle Village to be designated as open space for a neighbouring development under a different planning authority. The land should be designated as ‘Knowle Open Space’ as retained under settlement gap NE7.</p> <p>The provision for Fareham Borough Council to develop infrastructure on the Knowle Triangle (section 14.115) should be removed or updated to state that any such development requires the permission of Wickham and Knowle Parish Council,</p>
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	<p>as the new landowners under the Section 106 agreement, and must be carried out in accordance with their mitigation plans, given that this land is part of the community-led development.</p> <p>The Parish Council has now been formally advised that the land promised to the Parish, along with the commuted sums set out in the Section 106 agreement, are potentially void. This is due to Homes England’s decision to sell the land to Buckland Development (Welborne), who have indicated an unwillingness to honour the community-led scheme.</p> <p>In light of these developments, it is submitted that the allocation of 200 dwellings to Knowle Village should be removed from the Local Plan until such time as the Parish Council has been provided with and reviewed any proposals from Buckland Development (Welborne), and can determine whether there remains demonstrable community support for the development. Without community development, there can be no homes at Knowle Village. The Parish Council would challenge the soundness of the Plan on the basis that Knowle Village, a small village lacking public transport, local schooling, and essential services e.g. fresh food shops has been allocated 200 dwellings, whereas larger settlements such as Swanmore have been allocated zero new sites, and market towns such as Bishop’s Waltham only 100 dwellings. Such disproportionate allocation raises fundamental concerns regarding the consistency and appropriateness of the Plan’s settlement strategy.</p> <p>Furthermore, allowing disproportionate development in Knowle Village risks setting an undesirable precedent. It could encourage similar allocations in other unsuitable rural villages, thereby undermining the principles of sustainable and appropriate development that the Local Plan must uphold.</p> <p>To clarify, the Parish Council requests that all 200 dwellings allocated to Knowle Village be removed from the Local Plan until such time as a new Section 106 agreement is provided by Buckland Development (Welborne). This agreement must be subject to full consultation with Wickham and Knowle Parish Council and Knowle Village residents to ensure that demonstrable community support for the development remains and that the designated settlement gap is clearly defined and protected through transfer to the Parish Council as per the initial agreement.</p>
<p>Officer Response</p>	<p>The Knowle Triangle is identified in the Welborne Plan as having the potential to provide Green Infrastructure. Therefore at this time it is considered appropriate for the Winchester District Local Plan to reflect this. The current wording regarding the Knowle Triangle is considered appropriate and flexible in these circumstances. WCC is holding ongoing discussions with Homes England to progress the outstanding s106 agreement and issue a planning consent for development of Ravenswood. The comments regarding the suitability of Knowle for a development of 200 homes are noted. The rationale for the proposed allocation is set out in the Development Strategy and Site Selection Background Paper (SD10b) and the position is summarised in paras. 2.55 to 2.56 of WCC’s Hearings Statement for Matter 8.</p>

MM109 (Policy KN1)

MM2040 39 - Wickham and Knowle Parish Council

Name	Mrs Sophie Thorogood
Representor Number	MM2040 39
Representation Number	MM2040 39-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>WKPC is producing the mitigation strategy as per the Council's community led development at this site</p>
Officer Response	Noted. No further amendment considered necessary.

MM111 (Policy HU1)

MM2040 21 - Toby Guest

Name	Toby Guest
Representor Number	MM2040 21
Representation Number	MM2040 21-1
Representation Summary	<ul style="list-style-type: none"> • The Parish Council believes that focus for WCC's emerging Local Plan will be windfall development and they have confirmed that they will not be submitting a Neighbourhood Plan at this stage; • The Parish Council have been preparing a Neighbourhood Plan for several years; • For WCC's next Local Plan the Parish Council will commence the production of a new, concise Neighbourhood Plan using a planning consultant (funding has already been ring fenced). • The Parish Council consider that a holistic proposal that includes the wider parish of Hursley and the sustainability of its various hamlets and settlements such as Standon, Pitt and Farley is needed; • Redevelopment of Hursley's existing council-owned brownfield sites could be one viable strategic alternative to building over the green fields, and consideration of a highly limited number and size of exception sites; • Strategic Sites have been mooted, such as the golf course and Pitt Vale, and we will also very likely continue to see applications put forward by local landowners and developers which Hursley Parish Council may or may not take into consideration at the relevant time; and • Alongside the potential small brown field sites more modest numbers may positively support the village's sustainability without significant development and loss of habitat, settlement gaps and heritage (also considering the needs and wants of hamlets like Standon, Farley, etc.).
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>In response to the email Consultation on Proposed Main Modifications to the Local Plan on 21/11/2025, and the various discussions that have since taken place with councillors and representatives at both Winchester and Hampshire level, Hursley Parish Council met last night to agree on our strategy going forward. The overwhelming majority voted:</p> <ul style="list-style-type: none"> • For the existing Winchester Local Plan (response due 16 January 2026) Hursley Parish will focus on village and wider parish windfall as backed by planning consultants, and other councillors. We shall not submit a Neighbourhood Plan at this stage. As you are aware we have been developing our draft Neighbourhood Plan for several years now, so it's not a case of Hursley having not done anything, however the time taken in its

production means that its validity and content is perhaps not as current or focussed as we would desire, it is also missing an updated consultation.

- For the 'new' Winchester Local Plan (running over the course of the next 24 months) Hursley Parish will commence the production of a new, concise and much-revised Neighbourhood Plan for the parish of Hursley from April-June 2026, once firm further requirements are communicated by Winchester CC (dates depend upon when workable clarity can be provided to the parishes). This will include securing a planning consultant running a parish-wide consultation and finalising for submission to the Local Plan by Dec 2026- Feb 2027 (timing dependent upon availability of a consultant, release of the requirements, workload of Hursley Parish Councillors and the findings of the Neighbourhood Plan itself). Funding for this is already ring-fenced within our budget.

Baseline understanding and assumptions

Relating to the existing Local Plan, it has been communicated to Hursley Parish Council that there is no immediate pressure on Hursley parish to provide significant numbers of housing stock (a target of 20 houses has been quoted in and around the village itself), nor housing stock outside of the current village building envelope. Relating to the new LP, we have already engaged with the WCC Housing Team regarding affordable and social housing within both the village and parish.

Whilst there is a clear focus on Hursley village itself due to the access, proximity to services and clear consideration given to the sustainability of its pubs, shops, Post Office, school, local businesses and transportation, we strongly believe that a holistic proposal that includes the wider parish of Hursley and the sustainability of its various hamlets and settlements such as Standon, Pitt and Farley is also considered.

Redevelopment of Hursley's existing council-owned brownfield sites could be one viable strategic alternative to building over the green fields, and consideration of a highly limited number and size of exception sites conjoining the village's existing building envelope another. Nevertheless we fully understand the need to balance the current state with the needs of future generations, survival of our local services, and the needs of those on low or more limited income wanting/needing to live in Hursley (in relation to current housing availability and pricing). We believe this should be our focus on future planning rather than just developing more high-cost developments to make up the numbers. There of course are Strategic Sites being mooted, such as the golf course and Pitt Vale, and we will also very likely continue to see applications put forward by local landowners and developers which Hursley Parish Council may or may not take into consideration at the relevant time.

Early signs show a natural resistance to any significant development beyond our village's settlement boundary for the time being, as once this rule is broken for a few homes it will be harder to resist proposals for a larger number of houses on greenfields in the future. However, resident consultation would form part of our Neighbourhood Plan and a more pragmatic position may present itself. This, alongside a consideration of some potential small brown field sites locally, and an additionally pragmatic consultative view to any more immediate landowner plans with more modest numbers may positively support the village's sustainability without significant development and loss of habitat, settlement gaps and heritage (also considering the needs and wants of hamlets like Standon, Farley, etc.).

	Hursley Parish Council .pdf
Officer Response	Comments noted. It is accepted that there has already been a lot of work undertaken on the Neighbourhood Plan and this work is still valid in terms of assessing the sites that are available in and the settlement of Hursley. Unlike the other Neighbourhood Plans, Hursley has only been allocated 20 dwellings (which it is accepted could come forward through windfall development). It is positive news that the Parish Council are still very much committed to preparing a Neighbourhood Plan and resources have been allocated to support them in this process which will feed in WCC's next Local Plan which is commencing straight away.

MM112 (Intermediate Rural Settlements – Otterbourne)

MM2040 24 - Helen Ross

Name	Helen Ross
Representor Number	MM2040 24
Representation Number	MM2040 24-1
Representation Summary	<p>The respondent believes the proposed modification is unsound due to concerns about the capacity of the allocated site (OT01) to deliver the planned number of dwellings while maintaining required open space.</p> <p>The respondent argues that the developable area of Land off Main Road (OT01) is insufficient to deliver the allocated 55 dwellings while maintaining the promised public open space. They cite previous masterplans showing only about 33 dwellings could fit in the area, suggesting either an overly dense development would result or open space would be lost.</p> <ul style="list-style-type: none"> • Transparency Issues • Housing Supply Shortfall • Alternative Site Proposal • Affordable Housing Needs
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Please refer to Grass Roots Planning Letter dated 14th January 2026 submitted on behalf of Barwood Land via e-mail on 14th January 2026 in response to Main Modifications MM112 and MM113.</p> <p>Representation copied from attached document in relation to MM112:</p> <p>Noting the implications of the main modifications for Otterbourne an policy OT01 (MM112, MM113) these has seen three changes. The first under MM112 being the updated housing figures to reflect the updated plan. And permissions as of 1 April 2025 (resulting in a reduction in the total provision from 77 to 74 dwellings) secondly under MM113 the removal of the reference to phasing given the deletion of policy H2 and thirdly under MM113 the additional requirement for further archaeological investigation of the site. Whilst we generally approve of the latter changes (and these were highlighted in earlier representations), we remain convinced that a more robust assessment of capacity is required in terms of what the allocated site can actually deliver (based on the sites developable area, commitment to POS provision and other additional constraints inc landscape,</p>

ecology and heritage). We also maintain that the windfall allowance is too high considering past trends and finally given the sustainability of the settlement we also maintained this should provide a greater contribution to meeting the authorities wider housing need through alternative/additional allocations

On our own assessment, when subtracting the land designated for open space at Land off Main Road (OT01), the developable area proposed for allocation is clearly not large enough to deliver the allocated 55 dwellings. The masterplan submitted for the previous applications on this site show only c. 33 dwellings in this area. Either an extremely dense development would result or further encroachment on adjacent open space would occur, and with this, further ecological and landscape impacts. At the Examination, the Council stated that a masterplan had been provided for the site, but this has never been made publicly available. If this is supporting evidence to the allocation, we ask for confirmation that the Inspector has seen this Plan and further request that it be made publicly available.

A principal factor of the Parish Council's support for OT01 is the promoter's (Gladman) assurance that any scheme would retain the important and well-loved existing public open space as required by the Parish Council. However, there remain serious questions regarding the ability of this land to deliver the

1. 55 dwellings allocated whilst retaining this open space. Indeed, Gladman indicated within their latest representations to the Local Plan that they consider the site suitable to deliver a significantly higher capacity given the increased housing need set out in the updated Standard Method. This would clearly only be feasible with the loss of this important open space. Again, for complete transparency, we consider it only fair that the Parish be given sight of any masterplan for the development before being asked to support the allocation.

Given its sustainability credentials, while we agree that a higher housing figure should be sought for Otterbourne, (noting the overall need for Winchester and surrounding authorities), we cannot agree that OT01 is a suitable size to accommodate the dwellings currently allocated, let alone meet a higher capacity. Not meeting this need will also have serious implications for affordable housing delivery. As noted in our response to Matter 8 at Examination 'Hampshire Home Choice' records highlight that only 6 affordable housing units were made available in Otterbourne for those on the waiting list in the last 5 years. The average wait time for those looking for an affordable home in Otterbourne is 92 weeks, putting it in the top 10 of Winchester settlements (out of 52) with the longest average waiting time. This needs to be addressed.

Emery Planning's response to the Main Modifications consultation regarding overall housing supply also confirms that updates are required to the Council's Housing Trajectory. These include adjusted build rates at Barton Farm, sites removed from the first five years where there is no clear evidence of deliverability, a reduction in the windfall allowance and the inclusion of the correct annual housing requirement figure of 707 dwellings. With these required amendments in place, it is evident that the Council will not be able to demonstrate a 5YHLS (with a 20% buffer) upon adoption of the plan.

It is clear from the evidence available that additional/ alternative options for allocation remain available in Otterbourne to meet this need, including Land off Cranbourne Drive (suitable to deliver up to 76 dwellings). This site is recorded as both deliverable and developable in the Strategic Housing & Employment Land

	<p>Availability Assessment and the recently withdrawn appeal confirmed that there are no outstanding technical constraints to the site's delivery (it was simply not considered acceptable on grounds of principle at this stage as it was located outside but adjacent to the settlement boundary).</p> <p>As set out in earlier representations, we continue to be of the opinion that policy OT01 has not been positively prepared and is not robustly justified by the evidence available. Whilst we acknowledge the late stage in the Local Plan's progression, we continue to strongly believe that the housing need proposed for Otterbourne should be higher given the sustainable credentials of the settlement, the allocation proposed is not considered suitable to meet the capacity proposed, the windfall allowance remains too high and with the noted concerns regarding the Council's ability to evidence a five year land supply on adoption as set out in Emery Planning's response to the Main Mods consultation, in our opinion it remains clear further allocations should be included to suitably address this need. We hope the contents of this letter is self explanatory, but should you require any further information please do not hesitate to contact us.</p> <p>Supporting Information</p> <ol style="list-style-type: none"> 1. 735 Winchester Main Mods LP Response - Barwood Land_Redacted.pdf 2. Response to proposed modifications - Barwood - December 2025.pdf
<p>Officer Response</p>	<p>This representation is not related to the main modification for this site allocation.</p> <p>Disagree, the developable area of the site is approx 2 ha, therefore 55 dwellings can be achieved. The site promoters, Gladmans set out in their response to the Regulation 19 draft Local Plan that: <i>'the site is capable of accommodating in excess of the 55 dwellings proposed whilst retaining land beyond the PROW through the site and significant elements of open space.</i></p>

MM113 (Policy OT01)

MM2040 24 - Helen Ross

Name	Helen Ross
Representor Number	MM2040 24
Representation Number	MM2040 24-2
Representation Summary	<p>The respondent believes the modifications are unsound due to unrealistic housing capacity assumptions, inadequate assessment of the site's constraints, and insufficient consideration of alternative sites.</p> <ul style="list-style-type: none"> • Issues raised in representation: • Site Capacity Concerns • Transparency Issues • Affordable Housing Needs • Housing Supply and Alternative Sites • Settlement Sustainability
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Please refer to Grass Roots Planning Letter dated 14th January 2026 submitted on behalf of Barwood Land via e-mail on 14th January 2026 in response to Main Modifications MM112 and MM113.</p> <p>Representation copied from attached document in relation to MM113:</p> <p>Noting the implications of the main modifications for Otterbourne an policy OT01 (MM112, MM113) these has seen three changes. The first under MM112 being the updated housing figures to reflect the updated plan. And permissions as of 1 April 2025 (resulting in a reduction in the total provision from 77 to 74 dwellings) secondly under MM113 the removal of the reference to phasing given the deletion of policy H2 and thirdly under MM113 the additional requirement for further archaeological investigation of the site. Whilst we generally approve of the latter changes (and these were highlighted in earlier representations), we remain convinced that a more robust assessment of capacity is required in terms of what the allocated site can actually deliver (based on the sites developable area, commitment to POS provision and other additional constraints inc landscape, ecology and heritage). We also maintain that the windfall allowance is too high</p>

considering past trends and finally given the sustainability of the settlement we also maintained this should provide a greater contribution to meeting the authorities wider housing need through alternative/additional allocations

On our own assessment, when subtracting the land designated for open space at Land off Main Road (OT01), the developable area proposed for allocation is clearly not large enough to deliver the allocated 55 dwellings. The masterplan submitted for the previous applications on this site show only c. 33 dwellings in this area. Either an extremely dense development would result or further encroachment on adjacent open space would occur, and with this, further ecological and landscape impacts. At the Examination, the Council stated that a masterplan had been provided for the site, but this has never been made publicly available. If this is supporting evidence to the allocation, we ask for confirmation that the Inspector has seen this Plan and further request that it be made publicly available.

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Given its sustainability credentials, while we agree that a higher housing figure should be sought for Otterbourne, (noting the overall need for Winchester and surrounding authorities), we cannot agree that OT01 is a suitable size to accommodate the dwellings currently allocated, let alone meet a higher capacity. Not meeting this need will also have serious implications for affordable housing delivery. As noted in our response to Matter 8 at Examination 'Hampshire Home Choice' records highlight that only 6 affordable housing units were made available in Otterbourne for those on the waiting list in the last 5 years. The average wait time for those looking for an affordable home in Otterbourne is 92 weeks, putting it in the top 10 of Winchester settlements (out of 52) with the longest average waiting time. This needs to be addressed.

Emery Planning's response to the Main Modifications consultation regarding overall housing supply also confirms that updates are required to the Council's Housing Trajectory. These include adjusted build rates at Barton Farm, sites removed from the first five years where there is no clear evidence of deliverability, a reduction in the windfall allowance and the inclusion of the correct annual housing requirement figure of 707 dwellings. With these required amendments in place, it is evident that the Council will not be able to demonstrate a 5YHLS (with a 20% buffer) upon adoption of the plan.

It is clear from the evidence available that additional/ alternative options for allocation remain available in Otterbourne to meet this need, including Land off Cranbourne Drive (suitable to deliver up to 76 dwellings). This site is recorded as both deliverable and developable in the Strategic Housing & Employment Land Availability Assessment and the recently withdrawn appeal confirmed that there

	<p>are no outstanding technical constraints to the site's delivery (it was simply not considered acceptable on grounds of principle at this stage as it was located outside but adjacent to the settlement boundary).</p> <p>As set out in earlier representations, we continue to be of the opinion that policy OT01 has not been positively prepared and is not robustly justified by the evidence available. Whilst we acknowledge the late stage in the Local Plan's progression, we continue to strongly believe that the housing need proposed for Otterbourne should be higher given the sustainable credentials of the settlement, the allocation proposed is not considered suitable to meet the capacity proposed, the windfall allowance remains too high and with the noted concerns regarding the Council's ability to evidence a five year land supply on adoption as set out in Emery Planning's response to the Main Mods consultation, in our opinion it remains clear further allocations should be included to suitably address this need. We hope the contents of this letter is self explanatory, but should you require any further information please do not hesitate to contact us.</p> <p>Supporting Information</p> <ol style="list-style-type: none"> 1. 735 Winchester Main Mods LP Response - Barwood Land_Redacted.pdf 2. Response to proposed modifications - Barwood - December 2025.pdf
<p>Officer Response</p>	<p>This representation is not related to the main modification for this site allocation.</p> <p>Disagree, the developable area of the site is approx 2 ha, therefore 55 dwellings can be achieved. The site promoters, Gladmans set out in their response to the Regulation 19 draft Local Plan that: <i>'the site is capable of accommodating in excess of the 55 dwellings proposed whilst retaining land beyond the PROW through the site and significant elements of open space.</i></p>

MM115 (Policy SW01)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-3
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion.</p> <p>Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p>

It includes the following text –*In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to:x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.*

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.176 in supporting text already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion.’*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion’.

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that this development falls within and identifies whether it is at capacity.

MM2040 26 - Beechcroft Land Limited

Name	Cleo Jefferies
Representor Number	MM2040 26

Representation Number	MM2040 26-1
Representation Summary	<p>The response expresses clear support for the proposed Main Modifications (MM50 and MM115) which remove phasing requirements for housing development at West Hill Road North, South Wonston. The respondent believes these changes will make the Local Plan more sound and compliant with national policy.</p> <ol style="list-style-type: none"> 1 Support for Removal of Phasing Requirements 2. Meeting Current Housing Needs 3. Site Suitability and Sustainability 4. Compliance with National Policy
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Support</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The following letter has been prepared by Ridge and Partners LLP ('Ridge') on behalf of our Client, Beechcroft Land Limited, to support representations to Winchester City Council's Proposed Main Modifications Local Plan Consultation, running until the 16th of January 2026.</p> <p>The Regulation 19 plan has allocated sites to meet the identified needs. One such site is the land at West Hill Road North, South Wonston (hereinafter referred to as 'the subject site'). Policy SW01 of the emerging plan confirms that the site has been allocated for "about 40 dwellings".</p> <p>Policy H2 of the Proposed Local Plan initially stated that the development is phased for the latter part of the Local Plan period, whereby planning permission for housing development will not be granted before 2030. However, the Main Modification Consultation removes this phasing requirement (MM50).</p> <p>This response provides support for removing the phasing requirement (MM50 and MM115), including reasons why the development of the subject site should be brought forward for immediate release.</p> <p>Due to the current unmet need for additional housing in South Wonston, the removal of the phasing requirement will enable this need to be met within the next few years, rather than after 2030, when the need would have grown further.</p>

	<p>The subject site is situated in a suitable and sustainable location that is favourable for the local community, with good access to existing services. Therefore, the removal of the phasing requirement will ensure the delivery is not unnecessarily delayed, further complying with the National Planning Policy Framework, which surrounds boosting housing supply delivery without delay.</p> <p>To conclude, we support Main Modifications 50 and 115. Without these amendments, Policy H2 would not comply with the NPPF, the recommendations made by the Inspector, and nor would they be in the best interest of the wider community and the requirement for housing in the area.</p> <p>Supporting Information</p> <ol style="list-style-type: none"> 1. Cleo Jefferies - Ridge Planning - 15.01.25 - Main Modifications Rep_Redacted.pdf
Officer Response	Support is noted for Modification.

MM117 (Policy SU01)

MM2040 16 - Mr Robert Parker

Name	Mr Robert Parker
Representor Number	MM2040 16
Representation Number	MM2040 16-1
Representation Summary	<p>The respondent strongly opposes Policy SU01 Brightlands and criticises the council's community engagement process.</p> <p>The main points raised in the representation is:</p> <ul style="list-style-type: none"> • Lack of Community Engagement with Sutton Scotney residents and people affected by the site allocation • Procedural Inconsistency with the SCI • Impact on Existing Residents • Legal Compliance Concerns • Site should be removed and other options considered
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Community Involvement</p> <p>3.14 The Council will undertake initial engagement with communities and stakeholders in early stages of preparing the Local Plan. This 'front-loading' gives people the chance to get involved in plan-making from the beginning of the process. The involvement should assist in the identification of important issues and the development of appropriate options.</p> <p>I'll begin by saying that I think that the Council probably did comply with their own Community Engagement Policy for the majority of this Local plan.</p> <p>However, THEY DID NOT engage with the community at Sutton Scotney regarding Policy SU01 Brightlands.</p>

Whilst I appreciate that the Inspector is not interested in the Regulation 18 Plan it is relevant to the lack of Community Engagement in as much as, at page 499 there is the following paragraph

14.133

Sutton Scotney is within the group of 'intermediate' settlements, where the aim was to identify new sites for 50-60 dwellings. However, investigation of the few potential development sites has revealed substantial foul drainage issues, such that it would not be appropriate to allocate additional land for development in this Local Plan. This could be reviewed in future Plans, should the current issues be resolved. It is expected that there is capacity for the development of about 20 dwellings in Sutton Scotney through windfall development.

There is no ambiguity in this paragraph. There was to be no development in this Local Plan but this decision could be reviewed in future Plans.

It is quite clear at this stage (November 2022) that there is no need for any detailed Community Engagement for Sutton Scotney residents regarding development in the village, although they could, of course, engage with the Council over the many other general and specialised policies in the Plan covering the whole District.

The wording on page 499 is important because, at very late notice in July 2024, Brightlands was included in the Regulation 19 Plan. This was wrong for two reasons. Firstly, this was not a future Plan but the same Plan in which development had been ruled out. Local Plan procedures follow a set pattern and when Regulation 19 Plan is produced it is the next stage in the procedure for the current Plan. It is not a future Plan. Secondly, because of this devious inclusion, Community Engagement had not taken place.

I make reference to 'devious inclusion' because of the attempts by the Council to conjure up some Community Engagement to present to the Inspector at the Public Examination.

Briefly the facts are these

26/3/24 A meeting took place at Winchester City Council offices between Adrian Fox, Councillor Porter, two City Councillors and two members of Wonston Parish Council. The Council stated their intention to include some development at Sutton Scotney as the foul water issues would be resolved by Southern Water upgrading the water treatment plants at Sutton Scotney. Two of the four SHELAA sites were being considered. The Wonston Parish Councillors were requested to treat the meeting as 'confidential' and not to discuss it with the other members of the Parish Council.

As a result, and after discussion at the next Wonston Parish Council Meeting the Chair sent a letter to the Strategic Planning Manager stating that there should be no attempts to impose confidentiality on Parish Councillors.

26/4/24 A further meeting took place at the Council offices and Teams but it was plagued with IT difficulties. Essentially the Parish Council were told that Brightlands had been selected and that the public would be consulted but not before publication of the Regulation 19 Plan.

11/7/24 A further Teams meeting took place with the Strategic Planning Manager and members of Wonston Parish Council when they were formally notified of the inclusion of SU01 Brightlands in the Regulation 19 Plan which was formally published on 19/7/24.

This outlines the engagement with Sutton Scotney. The following paragraphs confirm that this is insufficient to comply with the law and national guidance.

Engagement solely with a parish council is not sufficient to count as community engagement for a Local Plan (or Neighbourhood Plan). The planning system requires involvement of the wider general public and other stakeholders to ensure the process is transparent, inclusive, and democratically legitimate.

Wider Public Involvement: The law and national guidance, such as the National Planning Policy Framework (NPPF), explicitly state that plans should be "shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees". This mandates engaging with a broad spectrum of the local populace, including "hard to reach" groups.

There is absolutely no way in which Winchester Council can claim to have been transparent, inclusive or democratically legitimate in reaching the decision to include Policy SU01 in the plan. The site at Brightlands is unique in that it isn't an empty field just waiting for developers. It is a field in regular agricultural use with two properties right at its centre. Not at the front or side but bang in the middle.

The Council have shown absolutely no desire to engage with the 5 residents of the two properties - Brightlands and Brightlands Cottage. These houses have been here since circa 1935 and the current occupants have resided here for 34 and 25 years respectively.

The Council did not engage with residents. Not one letter; not one email; not one visit; not one telephone call. They have shown themselves to be uncaring and indifferent to their residents at Sutton Scotney, both those on Brightlands and the wider Sutton Scotney community. As far as the residents of Brightlands are concerned they have been committed to years of uncertainty, loss of enjoyment of property and potential health issues through noise and pollution and safety issues using the shared driveway both in vehicles and on foot.

	<p>To conclude, Policy SU01 Brightlands is unsound for the reasons given and it should be removed from the current Plan. Inclusion in a future Plan is accepted providing full Community Engagement takes place and any other options are included, such as the land south of Wonston Road which is preferred for development by the majority of local residents.</p>
<p>Officer Response</p>	<p>Disagree. This representation does not relate to the Main Modification itself but raises concerns about the process of selecting the Brightlands site for development and the level of engagement with residents. The Council does not agree with the statement that it failed to comply with its engagement policy. The Council has complied with the Statement of Community Involvement (SCI) and the requirements of the Local Plan Regulations.</p> <p>As set out in the <i>Site Selection Paper – Sutton Scotney (August 2024)</i> and the <i>Development Strategy and Site Selection Proposed Submission Plan Topic Paper (July 2024) [SD10b]</i>, the background to the allocation of Brightlands is clearly explained, including why the site was not proposed earlier at the Regulation 18 stage. The site was subsequently included in the Regulation 19 Plan and consulted on in accordance with statutory requirements.</p> <p>Background and Reason for Inclusion At the Regulation 18 stage, as set out in the SD10b and the Sutton Scotney site selection paper, it was not considered appropriate to allocate a site in Sutton Scotney due to foul drainage constraints. This position was clearly stated in paragraph 14.133 of the plan. Since then, circumstances have changed significantly: Southern Water is has completed the construction of a new sewerage pipeline between Sutton Scotney and South Wonston. This infrastructure resolves the previous constraint and enables the consideration of development sites in Sutton Scotney within the current plan period.</p> <p>Community Engagement We recognise your concerns about the level of engagement prior to the inclusion of SU01 Brightlands. While the Regulation 19 stage does not require the same level of engagement as Regulation 18, the Council did undertake discussions with Wonston Parish Council, Ward Members, and the Cabinet Member for Place and Local Plan to inform the decision-making process. These meetings were intended to ensure local representation and input ahead of publication.</p> <p>Government guidance does not mandate the inclusion of specific, firmed-up site allocations at the Regulation 18 (Issues and Options/Preferred Options) stage. There is considerable flexibility for local planning authorities in how they conduct this stage, and they may choose to consult on a site selection methodology or a list of <i>potential</i> sites for further assessment, rather than a definitive list of allocations.</p> <p>In view the infrastructure issues being resolved (and the clear marker in the Regulation 18 Local Plan that this was the key reason why a site was not allocated in the Reg 18 LP), this site was included in the Regulation 19 Local Plan. This provided the statutory opportunity for all stakeholders, including residents, to comment on this site allocation before the plan is submitted for examination. This stage is designed to ensure transparency and allow for representations to be considered by the Inspector.</p> <p>Soundness and Legal Compliance The Council considers that the inclusion of SU01 Brightlands is sound because:</p> <ul style="list-style-type: none"> • It is positively prepared to meet identified housing needs in accordance with the spatial strategy. • It is justified, given the resolution of previous infrastructure constraints and the assessment of available sites.

	<ul style="list-style-type: none"> • It is effective, as delivery is supported by committed infrastructure improvements. • It is consistent with national policy, which requires plans to be responsive to changing circumstances. <p>We do not consider that the allocation is legally non-compliant. The statutory requirements for consultation at Regulation 19 have been met and if there had been any concerns about the allocation of this site in this Local Plan it would have been identified in the Local Plan Inspector's post hearing note .</p>
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MM2040 32 - Wonston Parish Council

Name	Mrs Jocelyn Jenkins
Representor Number	MM2040 32
Representation Number	MM2040 32-1
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Object</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>Wonston Parish Council does not accept the Winchester City Council view that they participated in Community Engagement with residents of Sutton Scotney over the very late allocation of land at Brightlands and, in this respect, the Policy SU01 is unsound.</p>
Officer Response	<p>After reviewing the representation, which was previously attributed to MM17 (Policy D4), officers have determined that it more appropriately relates to MM117 and have therefore moved the comment accordingly.</p> <p>Disagree. This representation does not relate to the Main Modification itself but raises concerns about the process of selecting the Brightlands site for development and the level of engagement with residents. The Council does not agree with the statement that it failed to comply with its engagement policy. The Council has complied with the Statement of Community Involvement (SCI) and the requirements of the Local Plan Regulations.</p> <p>As set out in the <i>Site Selection Paper – Sutton Scotney (August 2024)</i> and the <i>Development Strategy and Site Selection Proposed Submission Plan Topic Paper (July 2024) [SD10b]</i>, the background to the allocation of Brightlands is clearly explained, including why the site was not proposed earlier at the Regulation 18 stage. The site was subsequently included in the Regulation 19 Plan and consulted on in accordance with statutory requirements.</p> <p>Background and Reason for Inclusion</p> <p>At the Regulation 18 stage, as set out in the SD10b and the Sutton Scotney site selection paper, it was not considered appropriate to allocate a site in Sutton Scotney due to foul drainage constraints. This position was clearly stated in paragraph 14.133 of the plan.</p>

Since then, circumstances have changed significantly: Southern Water is has completed the construction of a new sewerage pipeline between Sutton Scotney and South Wonston. This infrastructure resolves the previous constraint and enables the consideration of development sites in Sutton Scotney within the current plan period.

Community Engagement

We recognise your concerns about the level of engagement prior to the inclusion of SU01 Brightlands. While the Regulation 19 stage does not require the same level of engagement as Regulation 18, the Council did undertake discussions with Wonston Parish Council, Ward Members, and the Cabinet Member for Place and Local Plan to inform the decision-making process. These meetings were intended to ensure local representation and input ahead of publication.

Government guidance does not mandate the inclusion of specific, firmed-up site allocations at the Regulation 18 (Issues and Options/Preferred Options) stage. There is considerable flexibility for local planning authorities in how they conduct this stage, and they may choose to consult on a site selection methodology or a list of *potential* sites for further assessment, rather than a definitive list of allocations.

In view the infrastructure issues being resolved (and the clear marker in the Regulation 18 Local Plan that this was the key reason why a site was not allocated in the Reg 18 LP), this site was included in the Regulation 19 Local Plan. This provided the statutory opportunity for all stakeholders, including residents, to comment on this site allocation before the plan is submitted for examination. This stage is designed to ensure transparency and allow for representations to be considered by the Inspector.

Soundness and Legal Compliance

The Council considers that the inclusion of SU01 Brightlands is sound because:

- It is positively prepared to meet identified housing needs in accordance with the spatial strategy.
- It is justified, given the resolution of previous infrastructure constraints and the assessment of available sites.
- It is effective, as delivery is supported by committed infrastructure improvements.
- It is consistent with national policy, which requires plans to be responsive to changing circumstances.

We do not consider that the allocation is legally non-compliant. The statutory requirements for consultation at Regulation 19 have been met and if there had been any concerns about the allocation of this site in this Local Plan it would have been identified in the Local Plan Inspector's post hearing note .

MM119 (Policy WC1)

MM2040 15 - NHS Hampshire and Isle of Wight Integrated Care Board

Name	NHS Hampshire and Isle of Wight Integrated Care Board
Representor Number	MM2040 15
Representation Number	MM2040 15-4
Representation Summary	<p>The NHS Hampshire and Isle of Wight Integrated Care Board (ICB) expresses concern that the Main Modifications, while mentioning "physical and social infrastructure," do not explicitly include health infrastructure.</p> <p>The ICB requests amendments to the Main Modifications to explicitly reference health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p>
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation (September 2024) and participated in the Local Plan examination (June 2025).</p> <p>The ICB has reviewed the proposed Main Modifications and notes that references to "physical and social infrastructure" have been introduced in several policies. However, the amendments do not make it explicitly clear that health infrastructure is included. This lack of clarity is a concern, particularly given that education infrastructure is consistently and expressly referenced throughout the Plan, whilst health (as a recognised critical infrastructure) is not mentioned.</p> <p>For the Plan to be effective, justified and capable of implementation, the policies listed below must explicitly state that health infrastructure is included within references to physical and social infrastructure, rather than relying on interpretation at application stage.</p> <p>Accordingly, the ICB requests that the following Main Modifications are amended to make explicit reference to health infrastructure where infrastructure provision is required to make development acceptable in planning terms.</p> <p>ICB Winchester LP Main Modifications Response Final Redacted.pdf</p>
Officer Response	<p>Disagree with explicitly including health infrastructure in the criterion.</p> <p>Policy SP2 in the Local Plan covers the whole of the Winchester Plan area.</p>

It includes the following text –*In delivering the district’s housing, employment and community requirements development proposals will be expected, where appropriate, to: x. Undertake an assessment of the infrastructure and service capacity to serve new development and make arrangements in a timely manner for appropriate increases in infrastructure capacity or measures to mitigate impact.*

Paragraph 3.8 of the supporting text is followed by the following – *Development proposals will be supported which reflect these principles. Further guidance and expectations are set out in the other policies in this Local Plan, and supporting evidence such as the Infrastructure Delivery Plan and other documents listed after para. 2.16 (page 10) should be referred to when considering how to meet these requirements. Where it is understood there are likely to be specific requirements or issues which should be discussed with third parties such as infrastructure providers, they are identified the allocations policies and supporting text.*

Following the ICB response to the Reg 18 consultation, this policy now includes the words “physical and social infrastructure”. Paragraph 14.194 in supporting text already states - *‘This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council’s Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion. This will not apply to any development which comes forward under existing consents’*

The [Infrastructure Delivery Plan](#) was prepared in August 2024 based upon information received from the ICB and others. Part 4 (pages 54 to 70) sets out, for each allocation, the identified infrastructure requirements for allocated sites. This includes information received from the ICB on which surgeries serve the area, the ICB’s advice on their potential for expansion, and references to the ICB developer contributions statement. The expectation therefore is that those bringing forward development proposals will consult the IDP and have a discussion with the ICB regarding any infrastructure requirements. On pages 27 and 28 of the IDP, under the section “Additional Comments” it states –

The ICB has provided further clarification regarding which surgeries will serve each of the local plan allocations, and that information is included in Part 4 of this IDP. It should be noted that even if a surgery is over capacity on the ICB’s analysis it would still be necessary to understand how a contribution would seek to address the harm that would flow from further development in that catchment, particularly where there is no room for consolidation or expansion at the existing premises. It may also be necessary to consider issues such as whether there is capacity in another nearby surgery that could meet demand from new development. But the intention is for the Plan to highlight the need for developers to have early discussions with the ICB to understand the current position regarding GP practices and for the IDP to provide the best information available at this time regarding capacities and potential for expansion. This will not apply to any development which comes forward under existing consents’

In view of this is not considered appropriate or necessary to explicitly mention “health” in the relevant criterion as the ICB’s request has already been fully addressed in the Local Plan. The IDP lists the surgery that the development falls within and identifies whether it is at capacity.

MM121 (Appendix III)

MM2040 22 - South Downs National Park Authority (SDNPA)

Name	Mr Lewis Ford
Representor Number	MM2040 22
Representation Number	MM2040 22-4
Full Representation	<p>In terms of this Main Modification do you?</p> <p>* Comment</p> <p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>The SDNPA supports the inclusion of the SDNP Area on maps and plans related to W4, W5, W6, W9, W10, BW3, BW4, CC2, CC3, KW2, WK1, WK5, WK6 and OT1. However, for consistency, the SDNP Area also needs to be added to settlement maps for Winchester Town, Bishops Waltham, New Alresford, Colden Common, Denmead, Kings Worthy, Swanmore, and Wickham and Knowle, as well as site plans and wider context maps for allocation references W1, W2, W3, W7, W8, W11, CC1, SW1 and WK3.</p> <p>Supporting Information</p> <p>1. 260113 - SDNPA representation_Redacted.pdf</p>
Officer Response	<p>The following revisions to show the South Downs National Park boundary have been made to the settlement maps for:</p> <ul style="list-style-type: none"> Winchester Town, Bishops Waltham, New Alresford, Colden Common, Denmead, Kings Worthy, Swanmore, and Wickham and Knowle <p>The following revisions to show the South Downs National Park boundary have been made to the inset maps for site allocations:</p> <ul style="list-style-type: none"> W1, W2, W3, W7, W8, W11, CC1, SW1 and WK3.

MM2040 30 - Natural England

Name	Rachael Clemson
Representor Number	MM2040 30

Representation Number	MM2040 30-2
Representation Summary	Request further changes to Appendix III Glossary with regard to Ecological Networks.
Full Representation	<p>Please give details as to why you consider the Proposed Main Modification is not legally compliant or sound, and set out the change(s) you consider are necessary to make the Proposed Modification legally compliant or sound. Please be as precise as possible.</p> <p>MM121 Appendix III Glossary We suggest that this definition of ecological networks is extended from “habitat patches” to a network of core sites connected by buffer zones, wildlife corridors and smaller but still wildlife-rich sites that are important in their own right and can also act as ‘stepping stones’. As defined in the Making Space for Nature Report (Lawton 2010).</p> <p>534477 NE response to WCC Local Plan Main Modifications (002).pdf</p>
Officer Response	Appendix III MM 121 proposes the inclusion of a definition of Ecological networks, the Council has no objection to the amendment of this to reflect the comments by Natural England.