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Winchester District Local Plan

Winchester City Council Local Plan Examination

Hearing Statement Matter 12:

High quality, well designed places and
living well

April 2025



Winchester
City Council

Matter 12 High quality, well designed places and living well

Issue: Would the Plan’s approach to achieving high quality design in the Plan’s three spatial areas and the individual policies be clear, justified, and consistent with national policy and would they be effective?

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Strategic policy D1 High quality, well designed and inclusive places

- 1. The introduction to this chapter and policy is long, and repetitive in places (e.g. paragraphs 5.2, 5.4, 5.21, 5.26 onwards and 5.41 in setting out the requirement for a contextual approach). It repeats national policy and guidance and includes a section on the history of policy development. In this regard, would the policy be clear and unambiguous, so it is evident how a decision maker should react to development proposals?**

WCC response:

- 1.1 The Council acknowledges that the supporting text is long and includes various references to the requirement for a contextual approach. However, the Council considers this is appropriate given that this chapter of the local plan covers matters of importance to the community of the plan area and in response to the renewed emphasis on quality of design in national policy and guidance. This also recognises the nature and variation of built environments within the Winchester District and therefore, the Council considers Policy D1 is clear and unambiguous.

- 2. Would the definitions and stages of a contextual approach to design development be consistently used, clear and unambiguous. e.g. site analysis, constraints and opportunities, design principles/design parameters/design framework/ design vision? How does this relate to the Plan's glossary definition of 'design process'?**

WCC response:

- 1.2 The council considers that the glossary simply summarises the design process whereas the text within the chapter provides a more comprehensive description as to what is meant and required by the process.

- 3. The table on page 73 sets out the ten characteristics of successful places, considerations and sources of evidence. Should it refer to places for active play and sport and evidence sources?**

WCC response:

- 1.3 Under characteristic 'Public spaces', both the [Winchester City Council Open Space Assessment 2022](#) and the 2018 Parks and Open Spaces Survey are referenced, these documents provide detail of sites for active play and sport. See also PM14 which is proposed to improve the clarity of the supporting text. PM16 is also proposed in response to representations, to add specific reference to documents produced by third parties, where these may be appropriate to the site context. PM16 states "The final design solution needs to be a positive,

creative and a bespoke response to the site context. Where appropriate, the design also needs to take into account relevant national guidance, such as the guidance in the DfT document *Inclusive mobility: a guide to best practice on access to pedestrian and Transport infrastructure*, the Sport England Active Design Guidance and the National Grid document *Design Guidelines for Development near pylons and high voltage overhead power lines*. Including these proposed modifications will make the policy more effective.

4. Would strategic policy D1 provide a clear and unambiguous policy framework for high quality design of household and change of use development?

WCC response:

- 1.4 The principles and concepts expressed in the supporting text to Policy D1 would be able to be proportionately applied to all scales of development and changes of use. Policy D1 refers to ‘development’ and ‘all development’ and where aspects of the Policy are not to be applied to householder and change of use applications this is explicitly stated, therefore, the Council considers the Policy is clear and unambiguous.

5. Would strategic policy D1ii, iii, vi, xii and xiv include repetition within the Plan, so as to impact on effectiveness?

WCC response:

- 1.5 The Council considers that each criterion of the Policy covers specific matters to be addressed in terms of design outputs of proposals and the context of achieving high quality, well designed and inclusive places.

6. Should the policy and supporting text set out the requirement of good design to enhance community cohesion?

WCC response:

- 1.6 There are various references throughout the plan to social interaction (pages 67 and 74), the table on page 74 under the ‘public spaces’ characteristic refers to being inclusive and to ensure public spaces support social interaction. ‘Socially inclusive’ is specifically mentioned under the characteristic ‘uses’. The Council considers all these references make a positive contribution to good design and the need to enhance community cohesion and there is no need for further details.

7. Would strategic policy D1 and its supporting text appropriately refer to the constraint of utility infrastructure in the design process?

WCC response:

- 1.7 The Council proposes a modification to respond to this matter raised by the representations under PM15, to amend para 5.38: to read “The contextual factors to consider will depend on the characteristics of each site, and the form of development proposed. Matters to assess potentially include: **the presence of utility infrastructure**; the pattern of development; height, scale, massing and elevational treatment of surrounding development; land uses; movement patterns and routes; relationship with nearby facilities and services; landscape features; open spaces; topography; orientation; views; neighbouring occupants/uses; protected features; boundary treatments; existing buildings worthy of retention; water features; flooding; **and** microclimate.”

Strategic policy D2 Design principles for Winchester Town

1. Would Strategic Policy D2 in setting out the design principles for Winchester Town, have a clear purpose and avoid repetition of requirements of strategic policy D1 and the Plan’s site allocations?

WCC response:

- 1.8 The purpose of Policy D2 is to set out the specific design principles for the spatial area of Winchester Town given its unique setting and characteristics. This enables the user to refer to this policy when preparing proposals and for each of the criteria to be responded to and if necessary further specific details are then expressed in the site allocation policies. Policy D2 adds local detail to Policy D1.

2. Would strategic policy D2ii and viii, in referring to ‘...masterplans ... and other relevant planning documents that have been prepared and consulted on with the involved community...’, provide the necessary clarity?

WCC response:

- 1.9 The policy covers a wide variety of design matters to be referred to when preparing proposals and to aid the preparation of plans and documents to inform the design process, refers to various existing documents/plans and strategies that contain matters relating to design and layout etc. It would be expected that the policy is applied proportionately and as relevant to the nature and scale of the proposal. Indeed part ii specifically refers to ‘relevant aspects’, so the Council considers that this provides the necessary clarity.

3. Should the policy, for the purposes of soundness, provide a commitment to produce a spatial plan for Winchester Town, including a movement strategy, and urban design framework to assess proposals on opportunity and other sites to ensure a coordinated approach?

WCC response:

1.10 The Council considers that the local plan through implementation of policies SP2, H3 and E2, together with other strategic and detailed policies, together with the supporting text in Chapter 5, provides the spatial plan for Winchester Town. These policies cover matters of both types, quantities and distribution of new development and other spatial considerations. It is therefore not considered necessary for a commitment to produce a separate spatial plan for Winchester Town.

4. Should the supporting text at paragraph 5.45 make specific reference to the need to make effective use of land, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions?

WCC response:

1.11 The focus of para 5.45 is about appropriately scaled developments in the context of Winchester Town and the need to consider impacts on important views and landmark features. There are various references to the principles of the effective use of land, safeguarding and improving the environment and ensuring safe and healthy living conditions, throughout the local plan, and as the plan should be read as a whole, it is not considered necessary to amend para 5.45.

5. Would strategic policy D2x accord with Plan paragraph 5.50 in relation to responding to the listed opportunities in each opportunity area?

WCC response:

1.12 Para 5.54 states that *'Whilst the Areas of Opportunity do not have specific Local Plan policies they should be used as a starting point should any re-development proposals come forward in these areas.'* Five opportunity areas are then identified on page 84, with further details for each set out in para's 5.55, 5.56, 5.58, 5.59 and 5.60 respectively. PM17 is proposed to amend D2x to improve clarity with the wording and to make criterion x consistent with the wording of paragraph 5.50 in the Local Plan so it now reads 'For development in the identified opportunity areas, the potential for the proposal to deliver or contribute to the listed opportunities within that area; In addition to the specific comments for each area, the following points should be also considered –'

6. Would paragraphs 5.45, 5.51 introduce policy requirements within supporting text? Would this affect soundness?

WCC response:

- 1.13 The focus of para 5.45 is about appropriately scaled developments in the context of Winchester Town and the need to consider impacts on important views and landmark features. Para 5.51 simply identifies neighbourhood character areas within Winchester Town which should be reflected in any design process. Where these matters are of specific relevance, they are referred to in policy i.e. W8, W10 and W11. The council does not consider the references in paras. 5.45 and 5.51 affect the soundness of the local plan.

7. What is the status of the Winchester Town Vision? Would this be clear?

WCC response:

- 1.14 Para 5.47 – 5.51 refer to the Winchester Town Vision. Para 5.47 sets out clearly that the new vision for Winchester expresses a vision for the built up area of Winchester and its immediate surroundings to 2030. This is an evidence document prepared over a period of years with community and stakeholder involvement. Para 5.50 onwards then takes some of the key outputs from the vision and applies these to the local plan, to give these matters status through a development plan.

8. The supporting text to strategic policy D2 is long and includes historic evidence of approach development. In so doing would the policy be effective?

WCC response:

- 1.15 The council acknowledges that the supporting text to Policy D2 is long. However, it is considered that this is necessary to explain in some detail the matters of importance to the valued built environment and setting of Winchester Town, particularly given the numerous community interest groups that actively contribute. The text reflects the extensive evidence base that informs this part of the plan and the spatial area of Winchester Town and supports the details in policy D2, the council therefore considers the policy to be effective.

9. What would the large light purple arrow on plans on pages 87, 89, 91 represent, and should this be included in the key on page 83?

WCC response:

- 1.16 The large light purple arrow on the diagrams on pages 87, 89, and 91 denote opportunities to improve strategic connections identified as part of the Winchester Town workshops described in paragraphs 5.52 to 5.54 of the Proposed Submission Local Plan (Regulation 19) (SD01). There is an omission from the key on page 83 and should be included. The Council

proposes a modification to the Plan (PM209) to include the purple arrow and title “Improve Strategic Connections” on the key on page 83 of the Plan.

10. Would a key to the plans on pages 90 and 91 be required for clarity and therefore effectiveness?

WCC response:

- 1.17 Including a key to the plans on pages 90 and 91 will add to the length of the Plan. The key on page 83 makes it clear it applies to all the diagrams on pages 84 to 91. However, the plans on pages 90 and 91 do include a yellow arrow, showing opportunities to “Improve Wider Connectivity” which is not included in the key on page 83. Therefore a further modification is proposed (PM209) to make it clear what it denotes.

Strategic policy D3 Design principles for SHUA

1. Would strategic policy D3 in setting out the design principles for the SHUA have a clear purpose and avoid repetition of requirements of strategic policy D1 and the Plan’s site allocations?

WCC response:

- 1.18 The purpose of Policy D3 is to set out the specific design principles for the spatial area of South Hampshire which has its own characteristics. This enables the user to refer to this policy when preparing proposals and for each of the criteria to be responded to and if necessary further specific details are then expressed in the site allocation policies. Policy D3 adds local detail to Policy D1.

2. Strategic policy D3ii in referring to ‘...masterplans ... and other relevant planning documents that have been prepared and consulted on with the involved community...’, provide the necessary clarity?

WCC response:

- 1.19 The policy covers a wide variety of design matters to be referred to when preparing proposals, and to aid the preparation of plans and documents to inform the design process. It would be expected that the policy is applied proportionately and as relevant to the nature and scale of the proposal. Indeed part ii specifically refers to ‘relevant aspects’, so the Council considers that this provides the necessary clarity.

3. Given the Plan's site allocation policies would strategic policy D3i be necessary for effectiveness?

WCC response:

- 1.20 Policy D3 is strategic policy and therefore sets out the overall approach to design principles in the South Hampshire Urban Areas spatial area, and would be applied to proposals that come forward outside of the local plan. The allocation policies add specific site detail. Policy D3 is therefore considered necessary, to enable the council to appropriately assess new proposals that may come forward.

4. Would strategic policy D3iii repeat national guidance?

WCC response:

- 1.21 Policy D3iii does not repeat national guidance but requires the user to demonstrate how the named local evidence on the characteristics of well-designed places have been addressed in the design of proposals as part of the design process for preparing schemes.

5. Should the Plan include a plan, for the purposes of soundness, to indicate the exact area that the policy would apply to?

WCC response:

- 1.22 The policy relates to the South Hampshire Urban Areas. These are defined on page 16 of the Proposed Submission Plan (Regulation 19) ([SD01](#)), and are named in the Local Plan Vision. This spatial area is a local response to planning for the part of the district which lies within the Partnership for South Hampshire (PfSH) area, with strong economic and social ties to the urban areas to the south. The approach has been brought forward from successive Local Plans. It has not been necessary to define the area to date because the strategic developments brought forward in this area have had a clear sub regional role in terms of their scale and/or cross boundary nature.
- 1.23 Paragraphs 5.67 and 5.68 provide detail on the extent of the areas covered by the policy and the allocations are clearly defined on pages 364 to 385 of the Proposed Submission Local Plan (Regulation 19). The Council's experience to date it that there has not been any confusion about the distinction between the South Hampshire Urban Areas (strategic developments brought forward in this area with a clear sub regional role in terms of their scale and/or cross boundary nature) and the Market Towns and Rural Area (the reminder of the Plan area outside of these allocations and Winchester Town). In view of this it is not considered necessary to denote the area this policy relates to.

Strategic policy D4 Design principles for MTRAs

1. Would strategic Policy D4, in setting out the design principles for the MTRAs have a clear purpose and avoid repetition of requirements of strategic policy D1 and the Plan's site allocations?

WCC response:

1.24 The purpose of Policy D4 is to set out the specific design principles for the spatial area of the Market Towns and Rural Area, specifically as this part of the plan area includes a wide variety of settlements with differing characteristics. This enables the user to refer to this policy when preparing proposals and for each of the criteria to be responded to and if necessary further specific details are then expressed in the site allocation policies. Policy D4 adds local detail to Policy D1.

2. Strategic policy D4ii in referring to '...masterplans ... and other relevant planning documents that have been prepared and consulted on with the involved community...', provide the necessary clarity?

WCC response:

1.25 The policy covers a wide variety of design matters to be referred to when preparing proposals, and to aid the preparation of plans and documents to inform the design process refers to various existing documents/plans and strategies that contain matters relating to design and layout etc. It would be expected that the policy is applied proportionately and as relevant to the nature and scale of the proposal. Indeed part ii specifically refers to 'relevant aspects', so the Council considers that this provides the necessary clarity.

3. Would strategic policy D4iii repeat national policy?

WCC response:

1.26 Given that the SDNP boundary abuts a number of the settlements within the MTRA spatial area, the council considers that it is appropriate to refer to this in Policy D4 and that this does not repeat national policy.

4. Should the Plan include a plan, for the purposes of soundness, to indicate the exact area that the policy would apply to?

WCC response:

1.27 The policy relates to the Market Towns and Rural Areas. These are defined on page 16 of the Proposed Submission Local Plan (SD01), and are named

in the Local Plan Vision. This area includes many smaller settlements, which range from larger villages to small hamlets.

- 1.28 The Council's experience to date is that there has not been any confusion about the distinction between Winchester Town (being the settlement of Winchester), the South Hampshire Urban Areas (strategic developments brought forward in this area with a clear sub regional role in terms of their scale and/or cross boundary nature) and the Market Towns and Rural Area (the reminder of the Plan area outside of these allocations and Winchester Town). In view of this it is not considered necessary to denote the area this policy relates to.

Strategic policy D5 Masterplans

- 1. Would strategic policy D5 be clear in its policy wording and supporting text as to what development would require a masterplan (para 5.70 states '...assessed on a site by site basis...', strategic policy D5 states at different parts '...on larger sites ... significant development on sites occupied by major landowners/users...') when they should be prepared, how they would be agreed by the local planning authority, and their status on that agreement? In this regard would the policy be clear and unambiguous so as to be effective?**

WCC response:

- 1.29 The council considers that Policy D5 is clear and unambiguous – the first para refers to *'when proposals come forward on larger sites that may be brought forward in phases the local planning authority will seek to ensure that a masterplan is developed and agreed for the site.'* The second para then refers to *'Proposals for significant development on sites occupied by major landowners/users...'* therefore the policy is clear when there is an expectation that a masterplan should be prepared. The second para goes on to engagement with stakeholders and the community and that masterplans should be agreed with the LPA.

- 2. Would its policy requirements provide appropriate flexibility so as to strike the right balance between ensuring high quality design and sustainable development is approved without delay?**

WCC response:

- 1.30 The first part of the policy refers to *'in the interests of sustainable development'*. The policy specifically refers (para 2) that proposals will be permitted where they accord with the development plan and that there is a need to demonstrate how high quality design will be delivered. The elements listed in the third para will ensure the matters contributing to sustainable development will be considered as part of the application of the policy, this paragraph also refers

to such matters being proportionate to the scale of the site and proposed development, therefore providing flexibility for a proportionate approach.

3. Would this policy have a clear purpose, avoiding repetition in other Plan policies (e.g. site allocation policies and other design policies (strategic policies D1, D2, D3 and D4 in particular)?

WCC response:

- 1.31 The purpose of the Policy is to express where the council considers it would be beneficial for a masterplan to be produced, as it is not considered necessary in every circumstance. It is not considered that this repeats other policies as they refer to where a masterplan has already been prepared and therefore there is a need for the design process to take into consideration application of the matters included in the already agreed masterplan as they affect the emerging proposals for the site.

4. Would the third paragraph of strategic policy D5 provide the necessary clarity to ensure effectiveness, in particular ‘... should be preceded by...’?

WCC response:

- 1.32 It is agreed that the third paragraph of policy D5 does not provide the necessary clarity to ensure effectiveness. Therefore, a further modification is proposed (PM211) to remove the wording. Paragraph 5.72 of the supporting text in the Proposed Submission Local Plan (Regulation 19) already makes it clear that masterplans may be prepared in advance of or in conjunction with, planning applications.

- 1.33 The Proposed Modification would revise the third paragraph on Strategic Policy D5 as follows –

Any application for significant development on sites occupied by major landowners/users ~~should be preceded by~~, and is expected to achieve the following objectives proportionate to the scale of the site and proposed development:

5. Given that the Plan should be read as a whole, what is the justification for strategic policy D5xiii, xiv and xv?

WCC response:

- 1.34 It is accepted that the Plan should be read as a whole. But it is considered helpful for the policy to set out what aspects the council anticipates are likely to be required to be addressed in a masterplan, for the guidance of applicants and all parties.

6. Would the requirements of strategic policy D5xiv accord with Plan policy CN3iv, in relation to all new residential development?

WCC response:

- 1.35 Strategic policy D5xiv requires, where proportionate and appropriate, masterplans to assess the potential for including renewable energy schemes and refers to policy CN5. Policy CN3iv requires onsite renewables to provide 100% of energy required by residential buildings. These are not mutually exclusive aims, and including criterion xiv in policy D5 ensures that the potential for including renewable energy is addressed as part of masterplanning process, including those for mixed use and non-residential uses.

7. Would the requirement for a management plan as part of the masterplan process be overly onerous?

WCC response:

- 1.36 A management plan is different to a masterplan and reflects the need for assets to be managed post completion of a development. The council does not consider this to be overly onerous and it is an anticipated requirement on schemes with communal assets and land.

8. Should strategic policy D5xiii refer to green and blue infrastructure, for the purposes of soundness?

WCC response:

- 1.37 The council proposes PM18 in response to representations, to amend criteria xii as follows: Incorporate a green **and blue** infrastructure strategy, providing an integrated network of green **and blue** spaces, taking advantage of opportunities for off-site links to the countryside, South Downs National Park where applicable and wider green **and blue** network, and where necessary providing alternative recreational space to mitigate potential environmental impacts of development.

9. Overall, would the policy provide the necessary flexibility to ensure that sustainable development is not unnecessarily delayed?

WCC response:

- 1.38 See response to q2 above. The first part of the policy refers to '*in the interests of sustainable development*'. The policy specifically refers (para 2) that proposals will be permitted where they accord with the development plan and

that there is a need to demonstrate how high quality design will be delivered. The elements listed in the third para will ensure the matters contributing to sustainable development will be considered as part of the application of the policy, this paragraph also refers to such matters being proportionate to the scale of the site and proposed development, therefore providing flexibility for a proportionate approach.

Policy D6 Brownfield development and making the best use of land

1. This policy states that the local planning authority will prioritise development of previously developed land. How would this requirement be implemented and how would that requirement interact with strategic policy H2?

WCC response:

1.39 The council's phasing policy prioritises the development of previously developed land (PDL) before greenfield sites, ensuring that greenfield land is not brought forward for development until after 2030. As stated in paragraph 9.24 'Permission will not be granted for the development of sites in advance of this phasing unless the Council is having difficulty in demonstrating an adequate 5-year housing land supply, which is not expected to be the situation, or the site would meet a particular local priority for housing. Brownfield sites, which often have a long lead in time in terms of delivery have been specifically phased towards the earlier parts of the Plan period, as are sites meeting specialist needs such as older persons' or student housing.' Policy D2 works in conjunction with policy H2 to ensure the most efficient use of land.

2. In referring to '...development land within existing settlements...', would the policy accord with NPPF paragraph 89, which recognises that sites to meet local business and community needs in rural areas may have to be found adjacent or beyond existing settlements? Would this capture previously developed land outside settlements close to facilities and services so as to make best use of land? Should it for the purposes of effectiveness?

WCC response:

1.40 Policy D6 aligns with the NPPF's emphasis on making effective use of land by prioritising previously developed land within settlements and promoting higher densities in sustainable locations. However, it is acknowledged that the policy focuses on land within existing settlements and does not explicitly address PDL that may be located adjacent to or beyond settlements, as recognised in paragraph 89 of the NPPF.

- 1.41 The suitability of sites for development has already been assessed through a SHELAA and site selection process which has considered the suitability of previously developed land for development. The Plan already promotes the redevelopment of brownfield sites in appropriate locations outside of the settlement boundaries, specifically in policies E6 and E9 to E11. In addition, policies E9 and H7 allow for development outside of the settlement boundaries where justified by local need, and should schemes come forward under these policies then the merits of their location and presence of brownfield land can be considered at that time.
- 1.42 It is not considered to be appropriate to include in Policy D6 a statement that the redevelopment of well-located brownfield sites outside of the settlement boundary will be encouraged as this would provide less certainty for communities and all parties, and weaken the approach to encouraging rural economic growth set out in policies E6 and E9, by reducing the protection given to existing employment land.

Policy D7 Development standards

1. Would the policy serve a clear purpose and would it be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

- 1.43 Yes, the council believes policy D7 serves a clear purpose by setting out specific development standards to manage pollution and noise impacts, ensuring that new development maintains an acceptable environmental quality and protects human health and quality of life.
- 1.44 The policy is clear and unambiguous, as it outlines the key areas of pollution that must be assessed, including odour, light intrusion, air quality, water pollution, contaminated land, and construction impacts. It explicitly requires developers to demonstrate compliance with national statutory standards and to provide proportionate assessments and mitigation measures where necessary.
- 1.45 Regarding noise, the policy provides clear guidance by referencing the DEFRA Noise Policy Statement for England (NPSE) and requiring assessments to align with established thresholds such as the Significant Observed Adverse Effect Level (SOAEL) and the Lowest Observed Effect Level (LOAEL).
- 1.46 The structured approach of the policy ensures that decision-makers have clear criteria to assess development proposals, making it effective in guiding planning decisions while allowing flexibility for proportionate responses to different levels of impact.

2. The policy text includes repetition in paragraphs 5.80 and 5.84 in relation to construction impacts. In this regard would the policy be effective?

WCC response:

- 1.47 Paragraph 5.80 is the final paragraph in the section on general pollution, which does include noise as one of the potential impacts of development. Paragraph 5.84 does repeat the point made in paragraph 5.80 regarding the potential noise impact of construction, and therefore the Council proposes a modification to delete paragraph 5.84 (PM212) to make the Plan more effective

3. In addition, the supporting text at paragraphs 5.77, 5.78, 5.79 include policy. Should this therefore be included within policy text? What would be the consequence of these paragraphs in terms of policy effectiveness?

WCC response:

- 1.48 The purpose of paragraphs 5.77 to 5.79 is to provide further detail and explanation for how policy D7 will be applied. This would be made clearer by the correction of a typographical error in the text of policy D7. For that reason, Proposed Modification (PM213) is required to make the policy effective. The text incorrectly appended to criterion vi should be separated to make clear the scope and role of any assessment prepared, namely –

The report should identify and detail any mitigation measures that are necessary to make the development acceptable in respect of the adverse impacts on health and quality of life.

- 1.49 This would make clearer the role of paragraphs 5.77 to 5.79 in explaining how such an assessment should be prepared and what it should cover. Paragraph 5.77 outlines the purpose of the assessment required by D7. Paragraph 5.78 explains how the potential impact of external lighting, required under criterion ii, should be addressed, and Paragraph 5.79 sets out the circumstances in which an ambient air quality assessment required under criterion iii should be undertaken and the approach to follow.
- 1.50 Therefore subject to the proposed modification PM213 mentioned above, it is not considered necessary to make any further change to the Plan to make it effective.

Policy D8 Contaminated Land

- 1. Would the policy serve a clear purpose and would it be clear and unambiguous, so it is evident how a decision maker should react to development proposals?**

WCC response:

- 1.51 Policy D8 is clear, precise, and enforceable because it sets out specific requirements that must be met before development is permitted. The policy ensures that contaminated land is properly assessed and remediated, providing certainty for developers and safeguarding public and environmental health.

Policy D9 Shopfronts and policy D10 Signage

- 1. Would these policies serve a clear purpose and would they be clear and unambiguous, so it is evident how a decision maker should react to development proposals?**

WCC response:

- 1.52 The council believes that both policy D9 and D10 serve a clear purpose and are clear and unambiguous. Policy D9 is clear and unambiguous because it provides well-defined criteria for assessing shopfront alterations, ensuring consistency in decision-making. Overall, the policy is clear for decision makers because it provides specific, measurable, and enforceable design principles while maintaining some flexibility to accommodate different building styles and locations. Policy D10 is clear because it outlines clear location-based requirements, and references additional guidance. Policy D10 provides an effective and enforceable framework for signage control.