



Planning Inspectorate

Report to Winchester City Council

by R Barrett MRTPI IHBC

an Inspector appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040

The Plan was submitted for examination on 15 November 2024

The examination hearings were held between 22 April and 6 June 2025

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Abbreviations used in this report

AMR	Winchester District Authorities Monitoring Report
ED	Examination Document
GTAA	Gypsy and Traveller Accommodation Assessment
LHN	Local Housing Need
HMO	House in multiple occupation
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
MM	Main Modification
NPPF	National Planning Policy Framework ¹
PfSH	Partnership for South Hampshire
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
National Park	South Downs National Park
SFRA	Strategic Flood Risk Assessment
SHELAA	Strategic Housing and Economic Land Availability Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SoCG	Statement of Common Ground
the Council/City Council	Winchester City Council
the Duty	Duty to Co-operate
the Plan	Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040
the Regulations	Town and Country Planning (Local Planning) (England) Regulations 2012
WMS	Written Ministerial Statement

¹ NPPF December 2023 version

Non-Technical Summary

This report concludes that the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 (the Plan) provides an appropriate basis for the planning of the Winchester District, provided that a number of main modifications (MMs) are made to it. Winchester City Council (the Council) has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and carried out Sustainability Appraisal and Habitats Regulations Assessment of them. The MMs were subject to public consultation over nearly eight weeks. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the Integrated Impact Assessment (IIA), (Sustainability Appraisal (SA), incorporating the requirements of the Strategic Environmental Assessment Regulations, Equalities Impact Assessment and Health Impact Assessment) and Habitats Regulations Assessment (HRA) along with all the representations made in response to consultation on them.

The MMs can be summarised as follows:

- MMs to ensure that the housing requirement base date accords with the application of the Standard Method and national policy;
- MM to delete the phasing restriction in strategic policy H2 in relation to delaying the grant of planning permission for greenfield sites;
- The deletion and inclusion of site allocations within the Council's five year housing land supply on adoption of the Plan;
- Inclusion of a housing trajectory reflecting my findings on the Plan's housing requirement;
- MM to amend policy WK3 site allocation to include only land within the Knowle Triangle and Dashwood;
- Amendments to policy CN1 and CN3 in relation to energy efficiency standards;
- Other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 (the Plan) [SD01] in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate (the Duty). It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2023 (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 [SD01], submitted on 15 November 2024 is the basis for my examination. It is the same document as was published for consultation August 2024 to October 2024. [SD07a]

Main Modifications (MMs)

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out IIA, including SA, and HRA of them. The MM schedule was subject to public consultation for nearly eight weeks, taking the Christmas period into account. I have taken full account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the MMs and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alter the content of the MMs as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the

submission policies map comprises the set of interactive online plans identified as submission policies maps [SD05].

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
7. These further changes to the policies map were published for consultation alongside the MMs.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the submission policies map and the further changes published alongside the MMs [ED41d and f)] incorporating any necessary amendments identified in this report.

Context of the Plan

The Development Plan

9. The Plan sets out the Council's vision and objectives for the future development of the District outside of the South Downs National Park (National Park) as that has its own Local Plan. The Plan area includes Winchester itself, its market towns, villages and countryside. As submitted it includes new strategic policies and development management policies against which planning proposals will be assessed for housing, employment and open space, as well as specific sites that are needed to deliver planned growth over almost the next 15 years.
10. Once adopted, the Plan will replace the Winchester District Local Plan Part 1- Joint Core Strategy (March 2013), the Local Plan Part 2- Development Management Policies and Site Allocations (2017) [LP01-05] and the Gypsy and Traveller and Travelling Show Person Development Plan Document (2019) [GT03]. Together with Hampshire, Portsmouth, Southampton, New Forest National Park & South Downs National Park Minerals and Waste Plan (2013) and Made Neighbourhood Plans [NP02], it will form the Development Plan for the Winchester Local Plan area.
11. Appendix II of the Plan, sets out instances where a specific Plan policy supersedes an extant Development Plan policy. It omits Plan site allocations. That should be rectified by **MM120**, which includes additions to Appendix II to all Plan policies. That is a necessary change to ensure clarity and ensure the Plan accords with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The District

12. Winchester District, with a population of roughly 127,500, includes the historic county 'Town' of Winchester and roughly 250 square miles of Hampshire countryside. Around 40% of the District is within the South Downs National Park, which is afforded the highest landscape protection. The District covers a large and diverse area of wildlife habitats, including the River Itchen and Meon, the Forest of Bere and estuary of the River Hamble, some of which are internationally protected sites. It includes roughly 110 Scheduled Monuments, over 2,000 listed buildings and 37 Conservation Areas, 11 historic parks and gardens and a historic battlefield at Cheriton.

Public Sector Equality Duty

13. In preparing the Plan the Council conducted an Equalities Impact Assessment [SD02b] as part of the IIA [SD02a-SD02d]. That has been helpful in facilitating and evidencing equality issues and barriers in policy development.
14. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination. Those include the provision of housing, including affordable housing, accessible and adaptable housing, older persons and specialist housing, gypsy and traveller accommodation, and inclusive environments.
15. Also included are policies dealing with the protection and provision of infrastructure such as health facilities and schools, protection and provision of community services, facilities and employment space, sustainable forms of transport, childrens' play space and support for the future vitality of rural communities.

Assessment of Duty to Co-operate

16. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by Section 33A in respect of the Plan's preparation. The Written Ministerial Statement (WMS) on 'Reform to Local Plan Making' dated 27 November 2025 [ED43b] confirms that the Duty is to be abolished once new Regulations come into force. However, the Regulations are not in force yet, so I have therefore considered the Duty as per the prevailing legal requirement in Section 33A.
17. I invited comment from participants on the WMS and the Council's stated position in this regard, [ED43b and ED44] as part of an Inspector led consultation for a period of just over 4 weeks (16 December 2025-9 January 2026) [ED45]. I have taken into account all views expressed at that stage in reaching my conclusions on matters relating to the Duty.

18. In this regard, throughout Plan making the Council has had a constructive and active working relationship on strategic matters with its neighbouring Local Planning Authorities² both through direct engagement, focussed engagement on specific topics, officer led groups, and through the Partnership for South Hampshire (PfSH). It has also actively engaged with prescribed bodies³ on specific topics at key stages of Plan preparation.
19. The PfSH, is a partnership of Authorities in South Hampshire working together to support the sustainable growth of the South Hampshire sub region. It includes a number of Authorities that are not direct neighbours to this Council including Southampton City Council, Gosport Borough Council, New Forest District Council and the relevant New Forest National Park Authority. During Plan preparation, its joint working focussed on housing, energy and green environment, including nutrient neutrality and cultural and creative industry initiatives.
20. The PfSH produced joint evidence base studies, most pertinently the Spatial Position Statement (Dec 2023) [PSH01]. That sets the approach by which the PfSH authorities will collectively deliver on the housing and employment requirements in South Hampshire and on other key strategic issues. However, it did not apportion specific housing requirements to each member Authority.
21. Direct engagement with individual Authorities included joint evidence base studies and input into local plan preparation. Agreed Statements of Common Ground (SoCG) confirm Duty to Co-operate engagement [SD08a-I]. No neighbouring Authority has submitted objection to the Plan on the basis of the Duty.
22. Objectors to the Plan raised concern that direct and active engagement with Havant Borough Council and Portsmouth City Council, had not taken place, particularly between the Regulation 18 and 19 stages of preparation.
23. However, between the Regulation 18 and 19 stages of Plan preparation, engagement with neighbouring Authorities continued through the PfSH. After that direct engagement with Havant Borough Council and Portsmouth City Council took place through officer meetings and correspondence culminating in formal requests for assistance to meet their unmet housing needs in early 2024. [SD06].
24. Engagement with Basingstoke and Deane Borough Council, mainly through meetings at officer level, have culminated in a SoCG [SD08a]. Relevant cross border strategic matters include housing needs and supply, wider unmet needs, commitments to climate change and achieving nutrient neutrality. Agreement was not reached on some matters, including Popham Airfield, but the Duty does not impose a requirement to reach agreement.

² Basingstoke and Deane Borough Council, East Hampshire District Council, Eastleigh Borough Council, Fareham Borough Council, Havant Borough Council, Portsmouth City Council, Test Valley Borough Council, The South Downs National Park Authority,

³ Environment Agency, Historic England, Natural England, Clinical Commissioning Groups, Homes England, National Health Service Commissioning Board, Local Highways Authority, National Highways, Hampshire County Council, Civil Aviation Authority, Office of Rail and Road, Marine Management Organisation.

25. Overall, even though all matters were not resolved with neighbours, the Council has demonstrated constructive, active, and ongoing engagement to maximise the effectiveness of the Plan, with neighbouring, adjoining and other Authorities, Hampshire County Council, and other prescribed bodies, in relevant strategic matters during the preparation of the Plan. That includes with Havant Borough Council and Portsmouth City Council.
26. The soundness issues that arise in relation to strategic matters, including those not resolved through co-operation, are addressed throughout my report.

Assessment of Other Aspects of Legal Compliance

Local Development Scheme and Statement of Community Involvement

27. The Plan has been prepared in accordance with the Council's Local Development Scheme in effect at the relevant time [SD11, updated February 2025 at ED16].
28. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement in force at the time [SD12]. Four stages of consultation took place at various stages of Plan preparation. Those included at launch in July to September 2018, at Strategic Issues and Priorities in February to April 2021, at Regulation 18 in November to December 2022 and at Regulation 19 in August 2024 to 24 to October 2024 [SD07a].
29. The Council's Statement of Community Involvement states that the Council is obliged to consider the representations made [SD07a,b]. In that Statement the Council, for each stage of Plan making, documents the community participation and stakeholder involvement, and sets out how engagement has shaped the Plan in terms of the main issues raised through the consultations and how these have been dealt with. That complies with the requirements of Regulation 22(1)(c). It demonstrates how the Council has had regard to consultation responses. That includes duly made Parish Council comments.
30. Overall, in this regard, the Plan accords with the Council's Local Development Scheme and Statement of Community Involvement.

Sustainability Appraisal (SA) and Integrated Impact Assessment (IIA)

31. The Council conducted an IIA of the Plan. That comprised an SA, incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment and Equalities Impact Assessment. The Council prepared a report of the findings of the Appraisal and published the report along with the submission Plan and other documents under Regulation 19 [SD02a-SD02d].
32. The scoping stage provided an understanding of the social, economic and environmental baseline as well as the sustainability policy context. That identified sustainability issues that were translated into a set of sustainability

objectives (IIA/ sustainability framework). Consultation with statutory bodies informed the IIA framework. It provided the basis against which the effects of the Plan and reasonable alternatives were assessed. Focussed consultation was undertaken with statutory consultees on site assessment criteria which was used to inform the appraisal of site options as part of the IIA Report. That enabled assessment of site options on a consistent and transparent basis.

33. All elements of the Plan, including its vision, objectives, policies and site allocations were tested against the IIA framework and all reasonable alternatives.
34. In terms of reasonable alternatives, the IIA tested five spatial strategy options: a development strategy based on the adopted Local Plan, focussing development on Winchester and the larger more sustainable settlements; a strategy based on a new strategic allocation/new settlement; a strategy based on dispersing development around the District largely in proportion to the size of existing settlements; and, a variation of the first option, known as option 1A. That provides for a higher total number of dwellings and has the effect of reducing development in the South Hampshire Urban Area and increasing it in Winchester and the Market Towns and Rural Area.
35. The spatial strategy options tested through the IIA all exceeded local housing need (LHN) calculated using the Standard Method set out in national policy. In addition, all options included a buffer to contribute to the unmet need in the wider PfSH area.
36. During the early stages of Plan preparation there was considerable uncertainty in relation to unmet needs. The unmet needs were not quantified until after Regulation 18 stage in December 2023 when the PfSH Spatial Position Statement was agreed and published [PSH01]. That provided an overall figure of unmet need but did not apportion specific housing requirements to each member Authority. Given this uncertainty, and the related difficulty of testing a higher unknown quantum of housing, I find that the approach taken to be proportionate and justified in dealing with the uncertainty of the quantum of unmet need in the wider sub region to be addressed in this Plan.
37. Access to facilities and services from site allocation options was based on the presence or absence of key services and facilities based on Council held data sets within the Plan area only. Capacity issues were not taken into account. Rather an assumption was made that they would be addressed through the development management process and other funding mechanisms. The approach taken in this regard is proportionate and justified given the strategic nature of the IIA.
38. Overall, the IIA tested the Plan's policies against a range of different realistic options which amount to realistic alternatives. Site selection was tested against a range of reasonable alternatives to give a preferred selection using consistent

and transparent site selection criteria. A process of discounting sites in the absence of mitigation was reasonably applied.

39. Representors raised specific concerns in respect of the scoring for various options in the IIA. However, the appraisal process is not a precise science. It will always encompass differences of professional opinion on individual points, and as such differences of opinion do not necessarily mean the appraisal is flawed. The Council exercised its professional judgement in appraising reasonable alternatives. The scoring and conclusions reached in the IIA are reasonable, consistent, and robust.
40. Overall, I am satisfied that the IIA informed the development of the Plan at every stage; 2020 scoping stage; Regulation 18 and Regulation 19 stage. The appraisal was updated to assess the MMs [ED47g]. Overall, it has been an iterative process with the consideration and selection of strategic options fundamental to the approach to housing delivery. It was based on proportionate evidence. In this regard, the IIA meets the requirements of the 2004 Act and 2012 Regulations. It would also accord with the Planning Practice Guidance (PPG) in this regard.
41. Plan paragraph 2.21 deals with the Equalities Impact Assessment. **MM4** clarifies that the Equalities Impact Assessment was undertaken in the IIA. That change is necessary to ensure clarity and therefore effectiveness.

Habitats Regulations Assessment (HRA)

42. The HRA Scoping Report [HRA02] sets out that a full assessment was conducted as part of the HRA, as likely significant effects (LSE) on European sites could not be ruled out. Assessment was of LSE of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures⁴. The HRA screening included consideration of multiple European sites.
43. The HRA was updated at the Regulation 18 and 19 stages of Plan preparation [HRA01 and SD03]. To address Natural England concerns the HRA undertook an air quality assessment of the effects of the Plan on the River Itchen Special Area of Conservation (SAC), particularly in relation to Plan policy W5 Bushfield Camp allocation and potential vehicle emission impacts [SD04b superseded by ED05]. Together, those concluded no adverse effects on the integrity of the River Itchen SAC due to air pollution. That assessment is incorporated in an addendum to the HRA [SD04a].
44. In relation to nutrient neutrality, the Council's nutrient neutrality topic paper [SD10h] sets out the nutrient demand and mitigation supply in relation to the three riverine catchments in the District (East Hampshire, Test and Itchen). That is based on best available information, following Natural England guidance and

⁴ People Over Wind, Peter Sweetman v Coillte Teoranta 2018

agreement. It calculates Plan level nutrient demand and mitigation supply, taking account of upgrading of Council owned waste water treatment works, together with strategic mitigation through the PfSH. Based on that information and the application of Plan policy NE16, in relation to nutrient neutrality and water quality, which requires all new overnight accommodation is nutrient neutral, the HRA concludes no LSE. That assessment is incorporated within the addendum to the HRA [SD04a].

45. Natural England has also confirmed that following changes to Southern Water abstraction licences and to protect the River Itchen SAC, compensatory measures have been agreed between the Environment Agency, Natural England and Southern Water (River Meon and Dever). That required an Appropriate Assessment. On the basis of the additional air quality assessment, the HRA concluded that there will be no adverse effect on the integrity of the SAC Compensatory Habitats due to air pollution [ED20].
46. The HRA approach and findings were agreed with Natural England, along with the Plan's approach to provide for any necessary mitigation, as evidenced in its SoCG [SD08f superseded by ED19].

Climate Change

47. The Plan, taken as a whole, includes policies designed to secure that the development and use of land in the Plan area contributes to the mitigation of, and adaptation to climate change. This is a defining issue in the Plan flowing from the Council's Climate Emergency Declaration [CN08].
48. The Plan's spatial strategy expressed through policies SP1 to SP3 focuses development around sustainable travel modes of transport in existing settlements. Strategic policy CN1 sets out the Plan's approach to the mitigation of, and adaptation to climate change, policies CN2-CN8 provide further detailed requirements, including energy and water efficiency standards, support for renewable, low carbon and micro energy generation, energy storage and the requirement to report on embodied carbon. Those together seek to meet the aims of strategic policy CN1.
49. In addition, Strategic policy NE1 sets out the Plan's approach to protect and enhance biodiversity and the natural environment. To meet that strategic aim, policy NE6 ensures that development and changes in land use protect the water environment, against flood risk, and ensure development is served by appropriate water infrastructure. Policy NE4 protects and enhances blue and green infrastructure, whilst policies NE3, NE10 and NE11 protect and require open space and policy NE15 protects special trees, important hedges and ancient woodlands, all of which will help to mitigate climate change. The Plan's transport policies encourage non-motorised active modes of transport.

50. Moreover, the Plan's spatial strategy has been informed by Level 1 and level 2 Strategic Flood Risk Assessments (SFRA) [BNE35 and BNE21]. The site allocations have been informed by a Level 2 SFRA [BNE21] which provides a more detailed assessment of the nature of flood risk, using a climate change allowance as indicated in NPPF paragraph 167.
51. The Development Plan, taken as a whole, therefore includes policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change.

Conclusion

52. In conclusion, I consider that the Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

53. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified thirteen main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 Whether the Plan's spatial strategy and distribution of development is justified, effective and consistent with national policy.

54. The Plan's spatial strategy is based on a five-tier settlement hierarchy. That includes Winchester Town at the top of the hierarchy, two market towns of Bishop's Waltham and New Alresford along with five larger rural settlements. At the lower end of the hierarchy are intermediate rural settlements and smaller rural settlements.

Settlement Hierarchy

55. The settlement hierarchy methodology classifies settlements into a hierarchy based on the presence of key services (accessed on a daily basis) and other facilities (accessed less frequently). A weighting is applied to give a settlement score that reflects access to those services and facilities. The settlement score is combined with factors such as the presence of employment opportunities, level of economic self-containment, population and additional population catchment. That information is then used to allocate settlements within the hierarchy.

56. The extant Plan is supported by a similar approach. That methodology was found sound as part of the examination in public of that Plan. The Council's settlement hierarchy review background paper [DS01] updates previous studies, including earlier studies to support this Plan carried out in 2021 and 2022.
57. The settlement hierarchy review [DS01] revisited the scope as to which settlements were included in the assessment, the weighting to key services and other facilities and documented changes in services and facilities since 2022. Overall, that resulted in the re-categorisation of Swanmore as a larger rural settlement in the hierarchy.
58. Discussion at hearings took place on the need to assess services and facilities beyond settlement boundaries. The methodology employed assessed the presence of services and facilities within each settlement. Whilst there may be other ways in which such an assessment could be undertaken, the approach taken in this case is reasonable and logical, based on the most up to date information available. It is proportionate to the strategic nature of such an assessment.
59. Overall, the resultant settlement hierarchy represents a consistent application of an appropriate set of criteria. That includes its assessment in relation to Littleton, Newlands and Waterlooville. Overall, I consider that the settlement hierarchy provides a reasonable basis to inform the development strategy for the Plan.
60. The results of this process informs the identification of settlements for potential further development allocations and the subsequent identification of sites.

Settlement Boundaries

61. Settlement boundaries apply to settlements in the upper tiers of the settlement hierarchy. They are not applied to the smaller rural settlements and more dispersed villages. This follows the approach in the extant Plan. Settlement boundaries were reviewed, in light of recent or proposed development, generally drawing boundaries tightly around the edge of the built form or other recognisable permanent feature. To aid clarity in decision making, that is a justified approach.
62. This Plan does not include, within settlement boundaries, the major development sites in the South Hampshire Urban Area⁵ and Sir John Moore Barracks (Plan policy W2). That is because the exact disposition of development and uses will inform the settlement boundary. This will need to be addressed once development has taken place as part of a Plan review. This is an approach that has been used in the past in the District. Given the expected enhanced robustness of such an approach, the Plan takes a justified approach in this regard.

⁵ Policy SH1 Newlands (West of Waterlooville), policy SH2 North Whiteley, policy SH3 Whiteley Green, policy SH4 Solent Business Park NE8

The Spatial Strategy

63. The Plan's spatial strategy divides the District into three distinct areas, Winchester Town, the South Hampshire Urban Area and the Market Towns and Rural Area. The Plan allocates development to the settlements within each area informed by the settlement hierarchy.
64. Winchester Town, with its range of significant services, facilities and employment, is the cultural and economic focus of the District. It is the centre for growth for both housing and economic development, recognising its significant constraints.
65. The South Hampshire Urban Area includes Whiteley and Newlands. It is an area of significant growth, in accordance with commitments in previous Plans. Those commitments are still delivering. The Plan's approach is to reassess them to identify any acceptable intensification for modest additional growth beyond existing commitments.
66. The Market Towns and Rural Area include that part of the District outside Winchester Town and the South Hampshire Urban Area. It includes all the rural settlements and the undeveloped countryside outside the National Park.
67. The Plan's strategy is for this area to accommodate additional development to support modest growth to meet local needs in the most accessible and sustainable locations. Development should promote the vitality and viability of local services and facilities whilst retaining the settlement's rural character and settlement identity.
68. The Plan's spatial strategy was refined based on the settlement hierarchy review update [DS01], the availability of suitable, sustainable sites in each settlement category, absolute constraints to development, the outcome of the SA and discussions with Town and Parish Councils. Spatial options were tested through the SA process and consultation exercises at every stage.
69. In focussing growth in Winchester Town and other market towns and villages at the top of the settlement hierarchy, the Plan would direct development to the most sustainable locations and limit the amount of development in the open countryside.
70. The amount of development focussed in all three spatial areas of the Plan is based on its relative position in the settlement hierarchy, and the availability of appropriate sites, thoroughly tested through the site selection process. That included an assessment of the availability of sustainable forms of transport and measures to enable active forms of transport. It thereby enables an effective integration of homes, jobs, services and facilities. In this respect it is justified and consistent with national policy.

71. Settlement tiers within each spatial area are given an approximate housing provision figure in the Plan, comprised of existing commitments, a windfall allowance and proposed site allocations.
72. Strategic policies SP2 and H1 therefore express the Plan's spatial strategy as approximate housing figures. Those provide a guide to proposed housing distribution in each spatial area. The submitted Plan indicates a distribution of about 5,640 dwellings for Winchester Town, about 5,650 dwellings for South Hampshire Urban Area and about 3,850 dwellings for the Market Towns and Rural Area.
73. Those approximate housing figures are then translated into individual settlements, again providing a guide as to the amount of development expected to be delivered in each. All figures are appropriately expressed as 'about' which provides necessary flexibility for variations in planned and actual delivery and the outcome of the application of the Plan's design led approach at a site specific level.
74. The allocation of approximate housing provision figures to be met through site allocations, taking account of existing commitments, was based on professional judgement which was rationally applied in accordance with the settlement hierarchy. It is a reasonable and proportionate approach, justified in this case.
75. All approximate housing figures are updated by MMs in relation to the Plan's housing requirement, the justification for which is addressed later in my report. However, as a consequence, the Plan's spatial strategy and in particular its general housing distribution remains unchanged.
76. The spatial strategy takes account of development in the South Hampshire Urban Area to meet the unmet needs of the sub region. However, it would not be justified to attempt to confine that development to meet unmet needs as there would be no mechanism to enforce this.
77. Whilst there is evidence of unmet need in the wider sub region and the requirement for appropriate neighbouring Authorities, including Winchester to meet some of that is agreed, specific unmet need figures are not allocated to each appropriate member Authority [PSH01]. On the basis of my later findings on the Plan's housing requirement, a spatial strategy that enables delivery of supply in excess of LHN (including any need within the National Park) is justified and proportionate. It would accord with the PfSH Spatial Position Statement [PHS01].
78. In the longer term, the PfSH Spatial Position Statement identifies Broad Areas of Search for Growth to be considered in local plans, including the contribution they can make to ongoing unmet housing need. One of those is East of Botley which falls within Winchester District. It is intended that this broad area will be tested through the next review of the Local Plan. That review is underway [ED16]. On the matter of uncertainty and timing of identified unmet needs, the spatial strategy's approach in this regard is justified.

79. Overall, the Plan has adopted an appropriate strategy, which took account of reasonable alternatives and is based on proportionate evidence. The distribution of development between the Plan's three spatial areas is based on housing need, the settlement hierarchy, land availability, capacity and absolute constraints. That approach is soundly based.

Conclusion

80. The Plan's spatial strategy and distribution of development is based on robust evidence. It is justified, effective and consistent with national policy.

Issue 2 Whether the Plan's vision and strategic policies SP1, SP2 and SP3 are positively prepared, justified, effective and consistent with national policy.

81. The Plan includes a map of the District which is intended to show the different geographical areas of the Plan area. However, the three identified spatial areas are not included. **MM2** corrects this, which provides necessary clarity in the interest of effectiveness.
82. The Plan includes a graphic indicating the position on made and emerging neighbourhood plans. **MM3** clarifies that Wickham and Knowle Parish Council are in the process of bringing a Neighbourhood Plan forward. That change is necessary to ensure the Plan is factually correct to ensure effectiveness.
83. The Plan sets out a vision for the District. That was formulated on the basis of the District's challenges, identified in the Strategic Issues and Priorities consultation [CON04], refined through the IIA [IIA01-09], engagement with neighbouring authorities and developing evidence base studies, taking account of national policy. The vision identifies the key issues for the Plan which puts the climate emergency at its heart. From that the key issues identified include, carbon neutrality and low carbon infrastructure, high quality well designed places, sustainable transport, biodiversity and the nature emergency, the historic environment, provision of homes, and creating a vibrant economy.
84. The Plan's vision is formulated into spatial objectives and policies aimed to deliver the vision, ensuring proper regard is given to the impact of development on the environment, economy and society to achieve sustainable development. Those objectives accord with the IIA sustainability framework, are soundly based and focussed on the key challenges facing the District.
85. Strategic policy SP1 commits delivery of the Plan's vision and objectives through proactive engagement with a range of partners to achieve high quality sustainable development. In doing so, the policy is soundly based and justified.
86. Strategic policy SP2 sets out the broad requirements for development in the Plan area. It develops the Plan's vision and objectives into a spatial development strategy covering the three main spatial areas in the District, expressing this as approximate housing figures. Those have necessarily been updated by

MM49 for the reasons set out in the housing section of this report. They are also updated by my findings in relation to individual site allocations. Those should be translated into the overall approximate housing figures for each spatial area.

MM6 does this.

87. The Plan was prepared and examined under the December 2023 NPPF. It is most likely to be adopted under the December 2024 NPPF and its transitional arrangements. **MM6** sets this out within the reasoned justification to Strategic policy SP2 and in policy commits the Council to undertake a review of the Plan within 6 months of its adoption. It also sets out that the review will focus primarily on responding to the new increased housing need set out in the new Standard Method and any changes in national policy.
88. The Plan's housing requirement, even as submitted for examination, meets less than 80% of LHN calculated using the Standard Method set out in the 2024 NPPF. Therefore, the Council will be expected to begin work on a new plan as soon as the relevant provisions are brought into force. Any further policy requirement for a review is therefore not necessary. All changes within **MM6** are necessary to ensure that the Plan is justified, effective and consistent with national policy.
89. Strategic policy SP3 limits development in the countryside to that which has an essential need to be located within the countryside. The countryside is defined as areas outside settlement boundaries. That distinction ensures clarity and is justified and effective. However, in setting out development that is permitted it omits essential infrastructure, leisure and recreational development controlled elsewhere in the Plan (policy NE13). **MM7** includes these and is necessary in the interest of effectiveness.
90. **MM7** also clarifies the board principles for development in the countryside adding that it should not increase flood risk and where appropriate proposals should demonstrate they have considered and assessed any potential loss of the best and most versatile agricultural land. Again, that clarification is necessary in the interest of effectiveness.
91. Having regard to NPPF paragraph 21, the Plan makes a clear distinction between strategic policies that constitute a clear strategy for the pattern, scale and quality of development.

Conclusion

92. Subject to the MMs set out above, the Plan, in relation to its vision and strategic policies SP1, SP2 and SP3, has been positively prepared, and it is justified, effective and consistent with national policy.

Issue 3 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its housing requirement.

Components of the Plan's Housing Requirement

93. The Plan's housing requirement is based on LHN with an additional capacity based component to help meet needs outside the Plan area. As the Plan's LHN calculation includes need in that part of the National Park within the District, the Plan's housing requirement correctly takes account of capacity in that part of the National Park, known as the National Park allowance.
94. As there is evidenced unmet need in the wider sub region [PSH01], supply above LHN contributes to those unmet needs. In principle, this is a positive approach that is consistent with national policy. This is known as the unmet needs allowance.
95. In the submitted Plan the housing requirement is 15,465 dwellings which is the same as the housing supply. This is made up of LHN at 13,565 dwellings, of which 350 dwellings is to be provided within that part of the National Park within the District. That provides a supply in excess of LHN of 1,900 dwellings, which be allocated to meet unmet needs in the wider sub region.
96. However, I now assess whether the details of each of those three components are justified.

LHN

97. As submitted, Plan table H1 in the reasoned justification to strategic policy H1 sets out LHN, calculated for the period 2020-2040 of about 13,565 dwellings. That is derived from a number of LHN calculations 2020/21 through to 2024. The Plan includes a different LHN calculation using the Standard Method for each of the first four years of the Plan period, 2020/21 to 2023/24 and a different calculation in 2024 for the remaining 16 years of the Plan period. The last of those calculations in 2024 gives a LHN calculation for the last 16 years of the Plan period of 10,816 dwellings.
98. Local plans should be up to date and the calculation of LHN should be a forward-looking assessment of housing needs. National guidance expects LHN to be calculated at the start of Plan making and kept under review and revised where appropriate. However, each calculation of LHN amends the previous calculation.
99. Using the most recent calculation of LHN results in a LHN of 10,816 dwellings 2024-2040. The Plan should be corrected to indicate the latest calculation of LHN in 2024 running to the end of the Plan period which is 2040. That is necessary to ensure that the Plan accords with national policy, is positively prepared, justified and effective. **MM49** does this.

Aligning the Housing Requirement with LHN

100. The way in which the Council has derived the Plan's housing requirement from LHN is problematic. The Plan's housing requirement as submitted took account of completions since 2020, before the latest calculation of LHN (2024). That has implications for all components of the Plan's housing requirement.
101. The calculation of LHN is a forward-looking assessment of housing needs. From the point at which LHN is calculated it takes account of what has happened in previous years. Recalculating LHN starts the requirement from zero, cancelling out any under or over supply before the latest calculation of LHN. For this reason, past supply prior to the latest calculation of LHN (2024) should not be taken into account in deriving the Plan's housing requirement. National guidance explains that the purpose of the affordability adjustment applied in the Standard Method takes account of past delivery. It stands to reason that the same applies to over delivery.
102. I am aware that there is little difference in the Standard Method calculations 2020-2024 and that the latest 2024 calculation is below the 2020 LHN calculation. However, the 2024 calculation of LHN is the most up to date calculation. It takes account of changes in the inputs to the Standard Method during Plan making. It should therefore form the basis of the Plan's housing requirement.
103. This matter was discussed at length at examination hearings (24 April 2025). At my request the Council produced a note [ED25] which set out the implications for the Plan of changing its start date, in terms of the Plan's housing requirement, trajectory and five year housing land supply on adoption. It also provided a note on the implications for the Plan of a housing requirement start date that aligns with the latest calculation of LHN i.e. 2024 [ED34a and b] with regard to the same matters. Representors who commented on the matters raised in those notes at Regulation 19 stage had the chance to provide comment on those notes. In coming to my findings, I have taken all views into account.

South Downs National Park Allowance

104. Over forty percent of the District lies within the National Park. The calculation of LHN includes the part of the District included in the National Park, although the Council is not the Local Planning Authority for the area. The Plan therefore estimates a contribution to its housing requirement and supply from that part of the National Park within the District.
105. As submitted, the Plan's housing requirement in table H2 includes an estimated allowance of 350 dwellings for the National Park allowance. The Council's SoCG with the National Park Authority (SD08j) indicates a figure of 250

dwellings to be more realistic; a figure reconfirmed in post MM consultation. In addition, it sets out an agreement that if supply in that part of the National Park within the District is under that figure then supply in excess of LHN could be used to address the shortfall. Given the geography and that any unmet need is likely to be catered for in the Winchester District, this is a reasonable approach.

106. The National Park Authority's Local Plan is still in preparation. It is yet to go through the rigors of examination. Given that uncertainty, a figure of 350 dwellings based on historic delivery rates is reasonable, in the absence of substantive evidence to the contrary.
107. However, given the adjustment to the housing requirement period, and the Council's most recent monitoring information, the Plan's expected housing delivery within the National Park 2024-2040 is estimated at 312 dwellings. That includes completions 2024-2025, outstanding permissions, windfall, and any allocations in the adopted and emerging National Park Plans.
108. **MM49** therefore adjusts the expected contribution from that part of the National Park within the District in table H2 to accord with the above estimated figure. It also sets out the estimated National Park figure separately from the rest of the Plan's housing provision. Those changes will ensure clarity and that the figure is justified and therefore the Plan effective and consistent with national policy.
109. The National Park allowance of 312 dwellings is taken into account in the Plan's housing requirement as set out in Plan table H2. I have found that supply within that part of the National Park within the District is likely to meet this. It is unlikely therefore that any shortfall would need to be made up. However, the Plan provides some flexibility should that be the case. Given the uncertainty around this estimated figure that is a justified approach, which in any event should be a matter to be revisited in the review of this Plan.

Unmet Need in Neighbouring Authorities

110. NPPF paragraph 11b sets out that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within the neighbouring area, as established through Statements of Common Ground (SoCG).
111. There is evidenced unmet need in the wider sub region, as confirmed in the PfSH spatial position statement [PSH01]. However, whilst that quantifies unmet need at December 2023 it does not apportion a quantified housing number to each member Authority, including Winchester. Therefore, an approach that increases the requirement above LHN based on capacity, having taken account of the National Park allowance, to make a contribution to an unknown quantity of unmet need is therefore positive and justified in principle.

112. In dealing with this uncertainty, SoCG [SD08e and SD08i] between the Council and Portsmouth City Council and Havant Borough Council confirm agreement for a contribution towards their calculated unmet needs. That is based on an apportionment of the Plan's housing supply above LHN of 30% to meet the unmet need in Portsmouth and 70% to meet that in Havant. Those SoCG acknowledge that the agreement would be subject to change should the unmet needs allowance change during the course of the examination. Such an approach would broadly accord with the PfSH spatial position statement [PSH01].
113. The PfSH spatial position statement sets out that in the short term, some authorities (including Winchester) able to meet and potentially exceed their housing needs in their Plan area should contribute to ongoing unmet housing need in the sub-region. In the longer term, identified 'Broad Areas of Search for Growth' should be considered in local plans, including the contribution they can make to ongoing unmet housing need. One of those is East of Botley which falls within Winchester District. It is intended that this Broad Area will be tested through the next review of the Local Plan, which is now underway [ED16].
114. Given that the unmet needs allowance is comprised only of supply that exceeds LHN, that significantly reduces as a result of my **MM49**, necessary to ensure that the housing requirement aligns with the latest calculation of LHN and therefore runs from 2024-2040. Necessary changes result in an unmet needs allowance of 495 dwellings. That is a reduction from 1,900 in the submission Plan.
115. Housing supply that exceeds LHN in 2023-2024 will have provided some contribution to unmet needs in the wider area. The 2023-24 Winchester District Authorities Monitoring Report (AMR) [ED03b Table 3] confirms 1,000 dwellings delivered against a LHN of 676. In addition, as a matter of fact, in the early years of the Plan period 2020-2023, although not part of the housing requirement of this Plan, supply above LHN will also have contributed to the unmet needs in the wider area.
116. Taking all matters into account, with the necessary MMs to ensure a housing requirement start date that aligns with the latest calculation of LHN, I find the Plan's approach sound in dealing with the uncertainty regarding the amount of unmet needs in the wider area. Ultimately unmet needs in the wider area, will need to be addressed in all relevant PfSH member local plans. That will include a future review of this Plan.
117. **MM49** therefore updates the Plan's contribution to unmet need apportioning 30% of the Plan's supply that exceeds LHN to Portsmouth City Council and 70% to Havant Borough Council. Those proportions equate to 150 and 345 dwellings respectively based on an adjusted unmet needs allowance of 495

dwellings. Those changes are necessary to ensure clarity and that the proposed contribution to unmet need is justified and effective.

Housing Requirement

118. Plan table H2 sets out the Plan's housing requirement of 15,465 dwellings (15,115 excluding the National Park allowance). That should be amended in accordance with my previous findings in relation to LHN, the National Park allowance and any resultant supply exceeding LHN that would be available to contribute to unmet needs.
119. **MM49** therefore amends the Plan's housing requirement, running it from 2024-2040. Those changes are necessary to ensure that the Plan's housing requirement is justified and the Plan is effective. The Plan's housing requirement is therefore adjusted to 11,311 dwellings 2024-2040 in Plan table H2 (which is a figure including approximately 312 dwellings for the National Park allowance and 495 to contribute to meeting needs in the wider sub region) with consequential changes throughout the reasoned justification.
120. **MM49** also adjusts the housing requirement in strategic policy H1 in accordance with those calculations. That confirms a Plan housing requirement of about 11,000 excluding the National Park allowance. In addition, it updates the spatial distribution of development in the three Plan spatial areas.
121. The Plan's housing requirement as changed by **MM49** meets LHN in full, with a smaller contribution than in the submitted Plan to the unmet need in the neighbouring sub region. That is only because the contribution to unmet need is comprised of available capacity in accordance with the spatial strategy from the revised Plan housing requirement period of 2024-2040.
122. Whilst the housing requirement figure in strategic policy H1 differs from the total Plan housing provision set out in table H2, the difference between the two figures is clear; the latter excluding the National Park allowance. In addition, the way in which that figure is expressed ensures it is not a cap.
123. All those changes in **MM49** are necessary to ensure that the Plan's housing requirement is justified, effective and consistent with national policy.
124. The changes outlined in **MM49** require consequential changes throughout the Plan, particularly in relation to expected sources of housing delivery in the spatial areas and settlements in the District. That includes **MM51, MM66, MM78, MM84, MM85, MM89, MM93, MM97, MM99, MM101, MM103, MM108, MM110, MM112, MM114, MM116, MM118**, which are all necessary to ensure that expression of the spatial strategy as expected housing provision is justified by the evidence.

Plan Housing Requirement Period

125. NPPF paragraph 22 sets out that strategic policies should look ahead over a minimum 15 year period from adoption. The strategic policies in this Plan apply over different periods. However, on the basis of my MMs its housing policies are now likely to cover just less than the 15 years required by NPPF paragraph 22.
126. Given the requirement in national policy and the Regulations to review policies in local plans at least once every five years, there would be at least three reviews of the Plan before the end of the Plan housing requirement period. Those reviews would consider changing circumstances affecting the Plan area, changes in national policy and inform whether updates would be necessary.
127. In this context, little practical benefit would be realised from extending the Plan's housing requirement period, particularly where evidence base documents may have to be updated again, leading to further delays to adoption of the Plan. These considerations, taken together with the NPPF requirement for a planning system to be led by up to date plans justify the approach taken.
128. Overall, I consider it pragmatic for an otherwise sound Plan, with the necessary MMs set out in this report, to proceed to adoption, despite its housing requirement period falling just short of the required 15 years post adoption.

Conclusion

129. The Plan's housing requirement, even as adjusted by my MMs, represents an uplift to the requirement of the existing Plan (Winchester District Local Plan 2013) [LP01-04] in real terms. The extant Plan provides for 12,500 homes 2011-2031 with an annual requirement of 625 homes per annum compared to 688 homes per year to be delivered in this Plan. Net completions 2024/2025 were 834 dwellings, so the housing requirement, based on a thorough and robust assessment of supply appears realistic and capable of being exceeded in the early part of the Plan's housing requirement period.
130. The detailed impact of the Plan's approach on housing supply in the wider sub region is yet uncertain. Neighbouring authorities are all at different stages of Plan preparation. The Council has committed to keep the Plan under review, as required, using the latest data and guidance. It will need to continue work with the PfSH to address the unmet needs in the wider sub region.
131. To conclude, in arriving at the housing requirement, the Council has balanced LHN against anticipated supply and the District's constraints. Its housing requirement as modified by my MMs would still be ambitious, exceeding the annual requirement in the extant Plan.

132. Taking all matters into account, subject to my necessary MMs I consider that the Plan is positively prepared and is justified, effective and consistent with national policy in relation to its housing requirement.

Issue 4 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its housing supply.

133. The Plan was informed by the 2022/23 AMR [SD13], updated by the 2023/24 AMR [ED03a and b]. That was updated by the most recent monitoring information from 2024/25 [ED42b]. The Plan therefore is supported by the most up to date monitoring information.

Site Selection

134. Evaluation of site allocations for housing and employment was conducted through a series of District wide assessments. A long list of potential sites was compiled from a variety of sources, including the extant Plan and the Strategic Housing and Economic Land Availability Assessment 2021 and update in 2023 [HA04] and discussions with Parish Councils.

135. Only sites within or adjacent to the existing built form were subject of further consideration. All sites were assessed against a standardised set of criteria to scope out potential constraints. Further assessment was undertaken through the IIA. Sites were also assessed in light of other evidence base documents such as the strategic transport assessment [ST15], strategic flood risk assessment [BNE21,35, and 51] and HRA [HRA01,02]. Sites were further assessed against the Plan's strategic policies and any site specific constraints. The short list was further refined through the Reg 18 consultation, taking into account updated information on site delivery and suitability. Site specific constraints and infrastructure requirements were appropriately addressed through Plan policies.

136. In the early stages of Plan preparation the IIA assessment did not take account of site specific supporting information. That approach ensured that all sites were assessed on the same basis, enabled reasonable alternatives to be assessed and thereby ensured a robust approach. Site specific supporting information was taken into account later in assessing proposed site allocations. That was necessary to further test those sites and is a justified approach.

137. The methodology adopted included on site evaluation and professional planning judgement in evaluating each site against defined criteria. It also took account of the views of local people including Parish Councils, who were requested to nominate sites. Such an approach accords with NPPF paragraphs 16c, and 25. As nominated sites were subject to the rigorous assessment of the site selection methodology, whether a settlement is within a parish or not has not materially influenced the site selection process. Given the above analysis, I find the methodology adopted robust and proportionate.

Indicative Capacities

138. Indicative capacity of proposed allocation sites is based either on extant planning permissions, design capacity work or the application of a District wide density matrix based on the settlement hierarchy and spatial context of the site. It applied a standard density for urban, suburban or rural context. Density multipliers were applied for larger sites to assess the land take for open space and other infrastructure requirements.
139. The application of a formula based on prevailing density and built form provides a high level estimate of site capacity. In this case, I find it based on proportionate evidence of local conditions. It has been consistently applied to all relevant sites and is a proportionate approach to assessing indicative site capacity at this level.

Plan Trajectory.

140. The submitted Plan does not include a detailed housing trajectory. In accordance with NPPF paragraph 75 strategic policies should include a trajectory illustrating expected rate of delivery over the Plan period.
141. The Council produced a housing trajectory included as appendix A to the Housing Topic Paper Update January 2025 [ED02]. That informed the examination hearings. That trajectory has been further modified to reflect all my findings, requiring the alignment of the latest calculation of LHN and the Plan's housing requirement, deletion of the phasing restriction in strategic policy H2 and my other findings in relation to individual site allocations. A final revised trajectory forms the basis of **MM50** included in the Plan as appendix V. That rectifies its absence and is necessary to ensure the Plan's provision for housing is effective and accords with national policy. **MM50** also includes an updated diagram of the trajectory within the reasoned justification of strategic policy H2.
142. On the basis of **MM50** the Plan's housing trajectory identifies a total supply of 11,311 dwellings (including 312 dwellings within the part of the District included in the National Park) to be delivered 2024-2040 against a LHN of 10,816 dwellings. Plan housing delivery would need to be monitored against the Plan housing requirement, in accordance with NPPF paragraph 75.
143. The Plan's housing trajectory at **MM50** runs from the latest calculation of LHN in March 2024. It reflects reviews of deliverability of site allocations in August 2023 and January 2024 and the latest monitoring information. Based on site specific planning activity and developer/owner intelligence, I find that a robust approach.
144. The Plan's housing trajectory as **MM50** includes completions (834 dwellings and dwelling equivalents) and existing commitments 5,186 dwellings as at 1 April 2025. The Plan includes site allocations supplying 3,484 dwellings, together with small windfall sites supplying 1,495 dwellings. The National Park allowance is 312 dwellings which makes up for the Plan housing supply total.

145. The proposed windfall allowance is a realistic estimate based on evidence of the average windfall delivery over the past ten years. To avoid double counting with existing commitments the windfall allowance is applied to the latter fourteen years of the Plan period (2025 onwards). Based on historic supply, I am satisfied that there is compelling evidence that this will provide a reliable source of supply. I have no substantive evidence to indicate that future trends are likely to differ from historic rates.
146. Existing commitments are confined to outstanding planning permissions at the end of the most recent monitoring period (up to 31 March 2025). A lapse rate for outstanding commitments and allocated sites is not included, justified on the site specific evidence relating to their future development. No substantive evidence is before me to indicate that those trends will not continue. I am satisfied that this approach is sound.
147. The Plan's housing supply relies, in part, on a number of large urban sites, particularly in Winchester Town. The complexity in developing such sites and associated risk of delay is acknowledged. However, each site allocation has been thoroughly tested in terms of its appropriateness, through the site selection process, and its delivery interrogated as outlined under Issues 12-14 of my report.
148. Subject to the MMs being made, and considerations under Issues 12-14 of this report, I am satisfied that the sources of housing identified are justified and soundly based. I consider that the supply calculations and trajectory are based on up-to-date evidence of capacity and start dates and represent achievable rates of delivery.
149. The Plan proposes nearly 17% of housing coming forward on small sites. That is made up of completions since 2024, existing commitments, windfall and site allocations (policies W3 and CC4). Those sites are usually built out relatively quickly and in this regard the Plan would exceed the target for small sites less than one hectare set out in NPPF paragraph 70a. The provision of housing through small sites in this Plan is included in the reasoned justification to strategic policy H2 and summarised table H3.
150. Windfall accounts for much of the small sites supply. Specific small sites to meet the stated 17% supply are not identified through the development plan or in the brownfield register in accordance with NPPF paragraph 70a. However, that tension with national policy is not sufficient to make the Plan as a whole unsound.
151. Strategic policy H2 includes a phasing restriction on greenfield allocated sites. Its aim is to prioritise previously developed land, retain a more even housing trajectory, and ensure availability of strategic nutrient mitigation. However, regardless of those potential benefits, it would not accord with national policy to significantly boost the supply of housing. For this reason, **MM50** deletes this requirement in strategic policy H2. That change is necessary to ensure that the Plan accords with national policy.

152. That change requires consequential changes to the Plan foreword and introduction reflected in **MM1** and **MM5** and greenfield site allocation requirements, reflected in **MM70, MM88, MM92, MM94, MM95, MM96, MM98, MM106, MM107, MM113, MM115, and MM117**. All those changes are needed to ensure consistency with national policy.
153. **MM50** also confirms the Plan's housing provision and sets out the provision of housing through small sites in this Plan within the reasoned justification, summarised in table H3. Those figures need to be updated in accordance with **MM49**, as a result of changes to align the Plan's housing requirement with the latest calculation of LHN (2024), the latest housing monitoring information and my findings on individual site allocations. That is necessary to ensure the Plan is justified, effective and consistent with national policy.

Five year Housing Land Supply

154. The PPG sets out that strategic policies should identify a five-year housing land supply from the intended date of adoption of the plan. The Council intends to adopt the Plan in March 2026 [ED16]. The relevant time period for assessment is therefore 2026-2031.
155. The most up to date housing land supply evidence relates to 2024/5, whereas I have to make judgements from 1 April 2026. There is of course a significant degree of uncertainty, meaning that a precautionary approach should be taken.
156. I have assessed all components of the five year housing land supply in my findings on site allocation capacity, delivery and windfall allowance. Mindful of the element of uncertainty explained above, supply in the housing trajectory included in ED42b, is likely to provide a deliverable supply of housing land which exceeds the five year requirement on adoption of the Plan, when calculated against the Plan's revised housing requirement. Further, applying a 20% buffer as required after 1 July 2026 would be unlikely to change that position.
157. That gives confidence that a five year supply of specific, deliverable sites would be likely to be available from 1 April 2026, even if a discount of about 500 dwellings as advocated in objectors' concerns were applied.⁶

Conclusion

158. The Council has undertaken a thorough examination of sites based on robust evidence to deliver an appropriate strategy for allocated development sites. I have found that the Plan's site selection methodology accords with national guidance and policy in striving to meet LHN for the District. It has constructively

⁶ 14 Chesil St, Whiteley Green, Land off Tanners Lane, Denmead, Barton Farm, Station Approach, Central Winchester Regeneration, North Whiteley, Cornerways, Merrydale and Land at the Lakes, Ravenswood

engaged with its neighbours to contribute to the unmet need in the wider sub region. It has taken account of the full range of policies contained within the NPPF. The Council has considered reasonable alternatives at every step of the site selection process.

159. Subject to the identified MMs, the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its housing supply.

Issue 5 Whether the Local Plan's housing policies would deliver the size, type and tenure of housing needed for different groups in the community and whether they would therefore be positively prepared, justified, effective and consistent with national policy.

Size/Mix

160. Policy H5 aims to deliver the type, size and tenure to meet housing needs and provide an acceptable level of amenity. The SHMA update [HA01] persuasively identifies that the breakdown by size of new private sector market dwellings should be 30% one and two bedroom homes, 45% three bedroom homes and 25% four bedrooms or more homes.
161. For affordable home ownership over 80% of the need is for two and three bedroom dwellings, and for affordable rented 40% is for three and four bedroomed homes.
162. The Plan includes Strategic policy H5 which aims to ensure the delivery of an appropriate size/ mix of housing to meet this identified need in accordance with the most recent evidence, including the Plan viability evidence [LVP01-18].

Self-Build and Custom Build Housing

163. The SHMA Update [HA01], and the Self Build Position Statement 2025 [ED10] confirms demand in accordance with section 123 of the Levelling Up and Regeneration Act 2023. That confirms as of October 2024 a cumulative demand for self and custom build plots of 407 and an additional 64 who do not pass the local connection test, excluding demand in the National Park. Given the focus of the Plan on the District outside the National Park, this is a justified approach.
164. As at October 2024 planning permission has been granted for 240 plots since October 2016. That leaves a shortfall against demand of 231 plots considering the requirements of section 123 of the Levelling Up and Regeneration Act 2023.
165. Strategic policy H5 supports self-build and custom build development, requiring sites of 50 dwellings or more to offer at least 6% of serviced dwelling plots for self or custom build for at least 12 months. Flexibility is built in for specialist/older persons accommodation.

166. I have no substantive evidence that this requirement would jeopardise delivery of small and medium sized sites. Integration of serviced plots in the overall development would be addressed through the Plan's design led approach. This requirement has been viability tested. The policy requirements are reasonable, focusing on the larger sites, each required to make a meaningful but small contribution to the overall supply.
167. Discounting large sites that would be likely to be unsuitable for self and custom build, such as town centre regeneration sites, this policy would result in approximately 153 additional plots for self-build and custom build coming forward within the housing requirement period of the Plan.
168. The remaining 78 plots, on the Council's calculations could be provided through windfall development based on supply over the last three years [ED10]. That would exceed the expected requirement by approximately 14 plots.
169. Taking all matters into account, I consider the Plan's approach, in providing policy support to meet self-build demand, accords with the Self Build and Custom Housebuilding Act 2015.
170. An 'exception site' policy approach supporting this type of housing outside settlement boundaries, subject to locational criteria such as accessibility, landscape impacts etc, would run the risk of adversely affecting the supply of affordable housing exceptions sites, given the higher values associated with self and custom build housing.
171. Given current commitments, the Plan's supportive policy framework specifically encouraging self and custom build, the Plan's approach is justified and soundly based.

Accessible and Adaptable Housing

172. Strategic policy H5 supports accessible and adaptable dwellings, seeking 5% of homes on sites of 10 homes or more to be wheelchair user dwellings M4(3)(2)(a) and 10% of all new affordable homes to be wheelchair accessible M4(3)(2)(b). It requires all other homes to be built to wheelchair accessible and adaptable M4(2) standard.
173. Given the expected increase in the over 65 population, there is an associated expected increase in people with mobility issues and dementia [HA01]. Appropriate evidence to meet the requirements in the PPG supports this approach, which includes viability testing.
174. National policy requires wheelchair accessible dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Strategic policy H5 accords with that.

Older Persons' and Specialist Housing

175. The SHMA Update [HA01] confirms that the number of people aged 65 or over is projected to increase by 45% between 2020-2040. It confirms a need for housing with support such as retirement /sheltered housing in the market sector. Whilst quantitatively there is sufficient supply of affordable housing, there are qualitative issues. Higher quality affordable provision may be needed through either remodelling of existing schemes or new-build.
176. The analysis also points to a strong potential need for housing with care (e.g. extra-care) in both the market and affordable sectors (87% market housing). The analysis also suggests a need for some additional nursing and residential care bedspaces although need and supply are currently broadly in balance.
177. Given this picture, strategic policy H5 supports specialist and supported housing, which includes that for older persons. It provides criteria against which proposals should be assessed. In addition, it requires schemes of 50 dwellings or more to provide an element of housing designed and marketed to meet the needs of older persons and local specialist needs, both in market and affordable housing.
178. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'downsize' which can help improve quality of life and free up homes to meet other identified need.
179. The SMHA update [HA01] additionally identifies a need for children's homes across Hampshire, typically to be through conversions of existing detached residential properties. Such proposals are also supported by strategic policy H5.
180. Given the Plan's supportive policy framework for older persons and specialist housing and the lack of evidence to support a target or range to meet identified need, the Plan's approach is justified. With effective monitoring it will be effective and consistent with national policy and guidance, which suggests but does not require the inclusion of targets.

Affordable Housing

181. The SHMA update [HA01] shows a need for 368 rented affordable homes per year in the Plan area. Further, it indicates that at least 30% of rented affordable housing should be provided at social rents if it is viable to do so, with affordable rents capped at Local Housing Allowance levels to ensure that homes are genuinely affordable, having regard to local incomes.
182. The evidence is less conclusive about the scale of affordable home ownership need, with a need demonstrated for up to 127 homes per year in the Plan area [HA01]. The affordable home ownership need is notably lower than that for rented affordable housing. Growth in the private rented sector does however

point to many households being excluded from the owner occupied sector. Overall, this translates to a combined need of 495 dwellings per year or 7,920 over the Plan's housing requirement period.

183. Policy H6 aims to help meet this need. It requires affordable housing on sites that increase housing supply by more than 10 dwellings, or over 0.5 hectares in size. The minimum requirement is 30% on previously developed land rising to 40% on other sites, with a 5% reduction in the short term where development is required to mitigate the impact of nitrates and phosphates on nationally and internationally protected sites including the River Itchen SAC and the Solent SAC. Flexibility is provided through the requirement for an open book viability assessment where site specific factors indicate policy compliant provision cannot be achieved.
184. In terms of tenure mix, policy H6 requires 35% as low cost home ownership and 65% as social rent or affordable rent (with rent levels capped at Local Housing Allowance level) with any deviation from rent levels justified through viability evidence. That accords with recommendations in the SHMA update [HA01] and the Plan's viability testing [LPV05].
185. Policy H6 requirements would deliver approximately 206 affordable dwellings a year (based on the lower target of 30%) and approximately 275 affordable dwellings a year (based on the higher target of 40%) on the basis of housing to be delivered during the Plan's housing requirement period. The remaining unmet need would be about 220-289 affordable dwellings per year. That would translate to a supply of between 3,296-4,400 affordable dwellings or 42-56% of the affordable housing need of 7,920 over the housing requirement period. That figure could be increased through the Council's house building programme and by registered provider activity other than through market led housing schemes.
186. The 40% and 30% figures have been robustly tested through the Plan's viability assessment. [LVP01-18] That demonstrates that delivering affordable housing at those levels is achievable with the specified tenure mix. A higher requirement, together with other Plan policy requirements would put development at risk. Although it would not meet identified need, it would provide a meaningful contribution towards meeting it. It is soundly based. Taking all matters into account the Plan's approach is justified.
187. The terms of policy H6 require affordable housing in line with the most recent evidence of need. However, it fails to specify what the tenure need requirement is. **MM52** specifies that social rent will be the priority, unless more recent evidence demonstrates otherwise.
188. In addition, the cost of nutrient mitigation is expected to decrease following the Government initiative of 'The Best Available Technology at Waste Water Treatment Works' in 2030. The circumstances in which an associated viability review would be appropriate are not clear. This is addressed through **MM52** along with

the deletion of unnecessary provisions setting out the need for a review of costs associated with phosphorous mitigation and sustainable construction costs for the purposes of future Plan making, which unnecessarily compromise clarity. Changes in **MM52** are required in the interest of effectiveness.

Exception Sites

189. Policy H7 supports development of affordable housing to meet specific local needs of particular settlements on land which would not normally be permitted, known as exception sites, setting out criteria against which proposals will be assessed.
190. However, as submitted policy H7 is not clear in its requirements in considering needs in the local area. **MM53** corrects this adding an explanation in the reasoned justification and making clear in policy that need relates to a settlement or area. That provides the necessary clarity for applicants and decision makers and is necessary in the interest of effectiveness.

Purpose Built Student Accommodation

191. Policy H9 promotes the development of purpose-built student accommodation in suitable locations. Given that development to consolidate, expand and improve academic provision at the University is supported by Plan policy W11, the Plan's approach is justified.
192. However, the policy does not extend to other types of student accommodation, such as boarding schools, which require similar accommodation. Given the presence of boarding schools in the District this is an obvious omission. It is corrected through **MM54**.
193. In addition, as submitted policy H9 restricts student accommodation on Plan site allocations for other uses, or where other policies protect existing uses. This is overly onerous and lacks necessary clarity and given the Plan should be read as a whole, it is unnecessary. **MM54** therefore deletes it. That change is required in the interests of effectiveness.

Houses in Multiple Occupation (HMOs)

194. Policy H10 deals with HMOs. It aims to prevent the overconcentration of HMOs in any street or area in the interest of the amenities of the existing neighbourhood and the character and appearance of the locality.
195. It sets out a commitment to designate Article 4 Directions to restrict HMOs to retain a balanced housing stock and sets out criteria against which proposals for HMOs should be assessed.
196. As submitted policy H10 provides exceptionally for a single existing dwelling in an area dominated by HMOs and rendered unsuitable for continued use as a dwelling to be converted to an HMO, subject to justification. However, require-

ments are lacking clarity. **MM55** therefore provides more detail requiring marketing evidence over a twelve month period. This is required in the interest of effectiveness.

197. **MM55** also includes an adjustment to policy H10 (iii) to include no detriment to the amenities of nearby residents or the overall character and amenity of the surrounding area. However, that wording is already included in the submission Plan and therefore I delete this part of **MM55**. That amendment to **MM55** does not significantly alter the content of the MM as published for consultation or undermines the Plan's participatory process.

Housing for Essential Rural Workers

198. Policy H11 supports essential worker accommodation in the countryside where there is a clear and proven need for accommodation for agriculture, forestry or other essential rural workers. It sets out criteria for temporary and afterwards permanent accommodation.
199. As submitted the reasoned justification sets out the need for development to avoid or mitigate adverse effects on the natural environment and biodiversity. However, it fails to refer to the historic environment, which is a necessary consideration. **MM56** adds that reference and is necessary in the interest of effectiveness.

Gypsy and Traveller Accommodation

200. The Council conducted a Gypsy and Traveller Accommodation Assessment (GTAA) in 2022 [GT01] and a Gypsy and Traveller Pitch Delivery Assessment in the same year [GT02]. Those, together were based on a sound methodology, which accords with Planning Policy for Traveller Sites 2024, considering the needs of all nomadic groups.
201. That evidence was updated by the Council's Gypsy and Traveller Topic Paper [SD10d). Together, the evidence concludes a need for 91 gypsy and traveller pitches and 35 travelling showpersons' plots 2022-2040, within the District, excluding the National Park. Much of that need is in the first five years of the Plan period. [SD10d].
202. The Plan's approach is to safeguard existing sites (policy H13), support intensification and extension of existing authorised sites (policies H14 and H15), provide 2 site allocations (H16 and H18) and windfall delivered, subject to a criteria based policy (policy H12).
203. The Plan's approach would deliver 128 gypsy and traveller pitches and 17 travelling showpersons' plots within the Plan period. The Plan would therefore meet and exceed the need for gypsy and traveller pitches but identifies a shortfall for travelling showpersons' accommodation of 18 plots.

204. The Council has carried out a granular search for both gypsy and traveller pitches and travelling show persons' plots, including on large sites and in neighbouring authorities through the Duty to Co-operate. Two sites have been identified, one for each type of travelling community (policies H16 and H18). Criteria based policies to enable intensification and expansion of existing sites (policies H14 and H15) and a criteria based policy to assess windfall (policy H12) will enable more accommodation to come forward.
205. The Council cannot demonstrate a five year supply of deliverable sites on adoption to meet identified gypsy and traveller accommodation needs. Provision in this period is most likely to come from the intensification or expansion of existing sites. The Council estimates a modest 75% contribution to meet identified need in this way. [SD10d]. No windfall is included in the first years of the Plan period, although windfall in accordance with evidenced historic levels should continue to deliver. Therefore, it is possible that further plots would come forward, and that could provide for a positive five year supply calculation.
206. Taking all these considerations into account, given existing commitments and a realistic windfall allowance, Plan site allocations, together with the inclusion of a criteria based policy to assess future proposals for gypsy and traveller and travelling show peoples' accommodation, in the absence of provision to meet the full need through site allocations, this is a justified approach and is soundly based.
207. Policy H12 sets out the Plan's gypsy and traveller accommodation needs for the Winchester Plan area over the Plan period along with criteria against which proposals will be assessed.
208. Policy H12, as submitted, does not provide appropriate protection for heritage assets and their settings. **MM57** addresses this, which is required for effectiveness.
209. Policy H13 safeguards traveller sites. That includes a list of sites with a reference number. Those reference numbers refer to the 2016 Gypsy and Traveller Accommodation Assessment. That is not clear, so **MM58** adds an explanatory footnote, which is necessary for clarity in decision making and thereby for effectiveness.

Conclusion

210. Subject to the MMs set out above, the Plan's housing policies would deliver the size, type and tenure of housing needed for different groups in the community. They are positively prepared, justified, effective and consistent with national policy.

Issue 6 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to carbon neutrality and designing for low carbon infrastructure.

Strategic Policy CN1 Mitigating and Adapting to Climate Change

211. Strategic policy CN1 sets out the Plan's overarching approach to carbon reduction, in response to the Council's Climate Emergency Declaration [CN08] and the need to reduce the District's carbon footprint. The Council has set out, in its Carbon Neutrality Action Plan [CN10], how it will deliver against the ambition to be carbon neutral by 2030. Therefore, it is justified that tackling the climate emergency is one of the defining issues for the Plan and frames the Plan's approach to growth.
212. Strategic policy CN1 seeks to reuse and refurbish existing buildings where possible and for new development to be designed to adapt to climate change in a positive, comprehensive and integrated way.
213. To that end, it sets out measures to reduce energy consumption rather than proposing energy standards. A key component is the requirement for an energy and carbon statement, proportionate to the nature of the proposed development, which demonstrates how a design process addresses this policy intent.
214. The Council undertakes to provide further details and a checklist to aid production of energy and carbon statements. It also references, in reasoned justification, the Chartered Institution of Building Services Engineers TM59 'Design Methodology for Assessment of Overheating Risk in Homes'. Given the availability of national level advice, this approach is reasonable and proportionate.
215. The policy requires an energy and carbon statement to be updated at each phase of a development. That is necessary as technology and its cost is changing at a rapid pace that may present new opportunities for low carbon solutions. The Plan provides some flexibility. Any potential impacts on deliverability or viability would be addressed through Plan policies including policy CN3 dealing with energy efficiency standards and policy H6 dealing with affordable housing.
216. In addition, the Plan's Viability Assessment [LPV01-18] made reasonable assumptions based on well established principles and methodology and appropriate evidence [CN13]. That concludes that the Plan's strategy and policies did not undermine the viable delivery of the Plan's expected growth.
217. It would be extremely challenging to set specific actions or targets in the Plan. Monitoring would be very challenging given that climate change and adaptation

underpins so many Plan policies and given the Plan has no control over some crucial matters e.g. decarbonisation of the grid.

218. As submitted the policy fails to set out the role for heritage in climate mitigation and adaptation. In addition, policy wording is not clear in relation to considerations of carbon emissions throughout the design processes and green roofs and walls that can contribute to mitigating overheating.
219. **MM8** addresses these points in setting out the role of a conservation led approach to climate change and adaptation. Those changes are necessary to ensure that the policy is justified, effective and thereby consistent with national policy.

Policy CN2 Energy Hierarchy

220. This policy requires development to accord with the energy hierarchy, which is a classification of energy options to embed more sustainable approaches right at the start of the design process. It is a well established hierarchy promoting the fabric first approach before considering maximising energy efficiency or lastly the use of low carbon energy solutions.
221. Setting a framework within which development should consider energy options is a justified approach and in accordance with national policy as expressed in the WMS published 13 December 2023.
222. The energy hierarchy is generally well understood in the industry. Therefore, it is justified that the policy does not set out a suggested approach at each level of the hierarchy. In this way the policy provides appropriate flexibility for site specific approaches, reading the Plan requirements as a whole and taking account of site specific energy aspirations, practical implementation and viability.
223. As submitted policy CN2 does not clearly set out that a fabric first approach will not always be appropriate for traditionally constructed buildings. That risks harm to heritage.
224. Therefore, **MM9** recognises this. In addition, it sets out the role that reuse can play in protecting heritage whilst addressing climate change mitigation and adaptation. Those changes are necessary to ensure that the policy is justified and effective.

Policy CN3 Energy Efficiency Standards to Reduce Carbon Emissions

225. Policy CN3 introduces local energy efficiency standards that go beyond current or planned Building Regulations. In addition, it expresses those using the Energy Use Intensity metric. The Plan's rationale for doing this includes to meet the Council's 2030 carbon neutral target and reduce energy bills for its

residents. The Council's analysis [SD10a] indicates that proposals under Part L 2021 and Future Homes Standard consultation do not currently go far enough to meet the reduction in emissions required to achieve Net Zero emissions in 2030.

226. Reducing carbon emissions and supporting the transition to net zero forms a central part of national policy as expressed in NPPF paragraphs 8c, 157 and 159b, in line with the objectives and provisions of the Climate Change Act 2008. The Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plans that exceed the energy efficiency requirements of the Building Regulations. However, such policies must not be inconsistent with relevant national policies and should use standards that are nationally endorsed.
227. The WMS dealing with energy efficiency standards published on 13 December 2023 advised that changes to energy efficiency Building Regulations are planned for 2025 meaning that homes built to that standard will be net zero ready. In that context the Government does not expect local plans to set local energy efficiency standards that go beyond current or planned Building Regulations. It requires planning policies that do propose higher energy efficiency standards to have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered. It also confirms that the additional requirement should be expressed as a percentage uplift of a dwelling's Target Emission Rate calculated using a specified version of the Standard Assessment Procedure.
228. In this respect, having regard to the Council's viability evidence [LPV01-LPV18 and CN13], including the requirements of the emerging Future Homes Standard and other Plan policy requirements that influence viability, in the round, I find the application of policies CN1 and CN3 would be unlikely to impose a significant financial burden on the Plan's planned development or have a significant effect on its viability. Deliverability is aided of course by the provisions of policy H6, in relation to affordable housing, that includes the potential for an exception to that policy on the basis of viability evidence. On that basis, I have no substantive evidence that deliverability would be materially impacted.
229. The WMS also requires that any additional energy efficiency requirements be expressed as a percentage uplift of the Target Emission Rate. The Council proposes to deviate from this and use an alternative metric, the Energy Use Intensity. It sets out a number of advantages of its use, which include that it represents regulated and unregulated energy use, it is based on predictive modelling results and is focussed on minimising energy use in the first place. Overall, it contends that it is a simpler metric, easy to understand by the development industry, residents and other stakeholders and can be used as a proxy for energy costs [SD10a].

230. The WMS is a material consideration but needs to be read in the context of national policy and legislation. Evidence is presented to indicate that achieving net zero using the metric proposed is both technically and financially feasible. I recognise that one of the objectives of the WMS is to prevent the proliferation of varied local standards, which can add to cost and complexity. Nationally applied standards provide clarity and consistency for the development industry to invest and prepare to build for energy efficient homes.
231. However, no matter how energy efficiency is proposed to be measured, the environmental outcome, to mitigate climate change and contribute to the net zero obligation, will remain the same. It will meet the over arching objective of national policy. Therefore, based on the evidence before me, I find the Council's approach in policy CN1 and CN3, subject to the MMs proposed consistent with national policy, justified and effective. It is therefore sound.
232. A phased approach would be unlikely to achieve the Council's aim to meet the Council's 2030 carbon neutral target and reduce energy bills for its residents. I am aware of the consultation taking place at present on a revised NPPF but that does not constitute national policy. Policy requirements are presented in a way that is coherent and easily understandable for housebuilders. The requirement for on site renewables provides appropriate flexibility to enable site specific solutions, including the alignment of energy production peaks with consumption needs.
233. However, as submitted, policy CN3 does not address the complexities of adopting a fabric first approach in traditional buildings. Policy wording in relation to new residential development is lacking clarity and it is unclear at what level requirements should be met (building or dwelling level). It is not clear as to what development non residential requirements relate, and energy modelling and calculation requirements necessary to meet the policy intent are lacking clarity.
234. **MM10** addresses these points. It sets out the complexities of insulating traditional buildings, providing a definition of traditional buildings and provides minor changes to policy wording to introduce necessary clarity on the other deficiencies identified.
235. However, **MM10** requires predictive energy modelling / Energy Use Intensity at outline planning stage. This will not always be appropriate where the quantum, layout etc of a development is not defined at that stage. The requirement would therefore not be effective. Hence, I am introducing appropriate flexibility to require such evidence to be submitted at outline stage, by including the words as appropriate against that requirement.
236. **MM10**, as modified, is necessary to ensure that the policy is justified and effective.

Policy CN4 Water Efficiency Standards

237. This policy requires a water efficiency standard of 100 litres/person/day for residential development, providing flexibility should it be demonstrated that this is not feasible.
238. This policy is set against the background of the South East of England classification as a seriously water stressed area and nutrient pollution from phosphorous and nitrogen in the District, alongside climate change. Climate change is likely to adversely affect supply, warmer weather likely to increase demand, which together with the increased demands on water resources due to growth supported in this Plan, is likely to have associated impacts on biodiversity.
239. The extant Plan sets a standard of less than 105 litres per person per day. That is reflected in viability evidence [LPV01-LPV18], which concludes that the overall cost impact of the policy would be nominal and reflected in the overall development cost allowances [VPV01].
240. Southern Water has a 100 litres/person/day target. This policy would align with that. The Policy is fully supported by Southern Water. It provides adequate flexibility where meeting that requirement is not feasible. Given all of these considerations, the policy approach is justified in this case. Appropriate evidence to justify a requirement above the tighter Building Regulations optional requirement of 110 litres/person/day is provided, which includes viability testing. It is a sound approach.

Policy CN5 Renewable and Low Carbon Energy Schemes and Policy CN6 Micro Energy Generation Schemes

241. These policies seek to support proposals for renewable or low carbon energy generation including micro energy generation schemes. They will help to ensure that schemes are in the right place and that they comply with criteria aimed to ensure acceptable development. Given the Council's Climate Emergency Declaration Plan such support is a justified approach.
242. However, at present neither policy properly reflects the heritage balance. This is addressed through **MM11 and MM12**. In addition, **MM12** adds a criteria to ensure there is an emergency plan for any energy storage facility, which is necessary to address the fire risk and potential contamination.
243. Changes in **MM11 and MM12** are necessary in the interest of effectiveness.

Policy CN7 Energy Storage

244. As submitted this policy supports energy storage. However, it is aimed at small facilities that could be built as part of a residential scheme. The scale of the proposals dealt with by this policy is not clear.

245. **MM13** therefore includes a threshold of 100kWh for community energy storage facilities. That would equate to storage for about 8-10 houses, which reflects the policy aim.

246. This policy aim is not clear from its title. Therefore, **MM13** changes its title to 'Community Energy Storage'. Changes introduced through **MM13** are necessary in the interest of effectiveness.

Conclusion

247. Subject to the identified MMs, the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its approach to carbon neutrality and designing for low carbon infrastructure.

Issue 7 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to achieving high-quality, well designed places and living well.

Strategic policy D1 High Quality, Well Designed and Inclusive Places

248. This policy sets out the Plan's overarching approach to achieving high quality design. Its aim is to provide certainty as to Council expectations on approach and considerations in its assessment of design.

249. To achieve this strategic policy D1 requires development to make a positive contribution to the area, considering the immediate and wider context to achieve good design. It sets out considerations to achieve high quality design that a proposal should demonstrate.

250. The reasoned justification sets out in some detail that this should be achieved through the application of a defined design process referred to as the Plan's design-led approach to development. That requires development proposals to demonstrate a process of site analysis, involving an examination of context, community engagement, setting a design vision, translating that into a design proposal, testing that proposal through an interactive process, and then defining and justifying a final design proposal.

251. The reasoned justification to this policy explains that high quality design is a key component of living well. It refers to and in places repeats national policy, matters addressed in the National Design Guide and in the Council's High Quality Places Supplementary Planning Document [HQD13]. It sets out the design matter outcomes identified in the Strategic Issues and Priorities consultation. [CON04]

252. As submitted, the reasoned justification refers to national guidance from the Department of Transport. That list should be widened to take account of Sport

England and National Grid guidance. It also should introduce some flexibility as to their consideration, as such documents will not be relevant to all proposals.

253. In addition, the policy reasoned justification, in setting out the contextual factors to consider when assessing the characteristics of a site, does not refer to utility infrastructure as a constraint. **MM14** addresses these points and ensures the list of considerations in assessing a site includes microclimate. That MM is necessary in the interest of effectiveness.

Strategic Policy D2-D4 Design Principles for Plan Spatial Areas

254. Strategic policies D2-D4 set out a vision and design principles against which proposals will be assessed for each Plan spatial area; an approach justified on the basis of each ones' unique identity, communities and character.

Strategic Policy D2 Design Principles for Winchester Town

255. The reasoned justification sets out the work in Plan preparation to construct the Winchester Town Forum Vision, which generally aligns with the Plan's vision for Winchester Town. It identifies opportunity areas which generally align with Winchester Town site allocations and sets out opportunities for each. This relates to Plan preparation, is long and complex, but overall does not materially diminish an understanding of the Plan's aim in relation to this spatial area. For this reason, this matter does not go to the heart of soundness.
256. The policy does not include a commitment for the preparation of a spatial plan for Winchester Town. However, the whole Plan approach to Winchester Town, particularly through Plan strategic policies SP2, and D2, Plan policies H3 and E2, together with the Plan's design led approach policies and site allocations provide a comprehensive strategy for the delivery of the type, quantity, distribution and quality of development to be delivered within Winchester Town.
257. At present strategic policy D2 Plan diagrams include purple and yellow arrows omitted in the key on page 83. They therefore lack clarity. The level of engagement which has informed the list of documents to be addressed in any proposal is not confirmed and there is some lack of consistency between policy wording at D2(x) and reasoned justification at Para 5.50, in relation to requirements for opportunity areas to address identified opportunities. **MM15** addresses these points. That is required to ensure that the policy is effective.

Strategic Policy D3 Design Principles for the South Hampshire Urban Area

258. The South Hampshire Urban Area has been identified for growth under successive Plans as a response to challenges presented by a significant part of the District being located within the PfSH area, some of which is significantly constrained. Previous Plans have allocated strategic development at Whiteley

and Newlands (West of Waterlooville) along with employment development at Solent Business Park, which is still being delivered.

259. This policy recognises opportunities within those developments for any further development or intensification, having regard to the need for strategic scale development to create their own identity.
260. The level of engagement which has informed the list of documents to be addressed in any proposal is not confirmed. **MM16** addresses this, which is required to ensure that the policy is effective.

Strategic Policy D4 Design Principles for Market Towns and the Rural Area

261. Strategic policy D4 sets out design principles to enable site allocations and other development proposals, including redevelopment and infilling in the District's market towns and rural villages to deliver the Plan's vision for that spatial area.
262. Again, the level of engagement which has informed the list of documents to be addressed in any proposal is not confirmed. **MM17** addresses this, which is required to ensure that the policy is effective.

Strategic Policy D5 Masterplans

263. This policy sets out the requirement for concept masterplans to be developed and agreed with the Council for development involving significant development sites.
264. As submitted, the policy does not accurately describe what it deals with. In addition, generally the reasoned justification and policy wording lacks clarity in setting out when a masterplan is required and how the process works.
265. **MM18** addresses these points and rewrites the reasoned justification and some of the policy wording. It sets out that a concept masterplan in accordance with the requirements of a site allocation will be required.
266. In addition, it confirms that a concept masterplan, based on proportionate evidence will be required, to be agreed by the Council and endorsed as a material consideration, for significant development sites. It then gives a definition of what constitutes a significant development site, to be determined on a case by case basis. It then sets out what is required by a concept masterplan, in accordance with other Plan design policies and refers to the Council's master planning approach to concept masterplans [HQD12].
267. The requirement for a management plan at concept master planning stage would be premature and therefore overly onerous. **MM18** therefore deletes this. In addition, **MM18** adds a requirement for a green and blue infrastructure strategy.

268. However, **MM18**, as consulted on, includes a requirement for a concept masterplan to precede applications for significant development sites; a requirement that would be assessed through pre-application engagement. That cannot be enforced and therefore would not be effective. In addition, it would fail to accord with NPPF paragraph 40 which sets out that local planning authorities cannot require a developer to engage with it before submitting a planning application.

269. I am therefore altering **MM18** to encourage rather than require a concept masterplan at Plan paragraph 5.71 and in policy wording confirm that an application should be 'accompanied by' rather than 'preceded by' a concept masterplan. In addition, I am deleting the reasoned justification at paragraph 5.72a that sets out the need for a concept masterplan to be determined in pre-application engagement.

270. That change does not significantly alter the policy and does not undermine the participatory process. Changes introduced by **MM18**, as modified, are necessary to ensure that the policy is justified, effective and thereby consistent with national policy.

Policy D6 Brownfield Development and Making the Best Use of Land

271. This policy aims to ensure land within existing settlements is used most effectively. That would further the aims of NPPF chapter 11. However, at present it refers to doing this by prioritising previously developed land, which implies through the application of strategic policy H2's phasing restriction on greenfield allocated sites. **MM50** deletes that restriction. Therefore, this phrase in this context causes confusion and should be deleted. **MM19** does that.

272. **MM19** would ensure consistency throughout the Plan, given my findings on strategic policy H2 at **MM50**, in relation to phasing of development sites. **MM19** is therefore necessary to ensure the Plan is justified, effective and consistent with national policy.

Policy D7 Development Standards

273. This policy deals with development which generates pollution, including noise, or is sensitive to it. It sets out requirements to ensure no unacceptable impact on human health or quality of life, demonstrating compliance with national statutory standards where applicable.

274. Policy D7 includes some repetition in the reasoned justification in relation to requirements for large or prolonged development construction impacts. In this case, repetition should be deleted, which is necessary to provide clarity. **MM20** does this and is necessary in the interest of effectiveness.

Policy D8 Contaminated Land

275. Policy D8 addresses development and contaminated land issues. It requires development of land known or suspected to be contaminated or affected by contamination in the vicinity, to ensure no unacceptable impact on human health, groundwater, surface water or the wider environment.
276. Policy D8 sets out the considerations at play in assessing such matters and the types of information required to satisfy them. However, there is a lack of clarity. **MM21** provides this, clarifying that planning applications should be supported by sufficiently robust and detailed information to enable a decision to be made on the principle of development, and referring to the appropriate use of conditions. That change is necessary in the interest of effectiveness.

Policy D10 Signage

277. Policy D10 sets out requirements for signage with the aim of maintaining the commercial and visual attractiveness of the local area. As submitted this policy implicitly gives development plan status to Council's Design Guidance for Control of Shopfronts and Signs. That is corrected through **MM22**.
278. **MM22** also clarifies requirements for advance warning signs, restricting them to directional messages alone and not general advertising, deleting the associated reasoned justification. **MM22** is necessary to improve clarity and thereby effectiveness.

Conclusion

279. Subject to the identified MMs, the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its approach to achieving high quality, well design places and living well.

Issue 8 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to sustainable transport and active travel.

Strategic Policy T1 Sustainable and Active Transport and Travel

280. Strategic policy T1 aims to promote active and sustainable transport and travel and reduce private car use for all new development. The reasoned justification refers to the emerging Hampshire County Council Local Transport Plan 4. That was adopted in February 2024. **MM23** corrects this.
281. Strategic policy T1 is based on the concept of a 20-minute neighbourhood. Whilst the policy recognises that policy intent will not be achievable in all parts of the District, amendment is necessary to clarify that it could be achievable in parts of the District beyond Winchester Town. The policy should therefore be

amended to refer to the principles of the 20-minute neighbourhoods. This is actioned through **MM23**.

282. The policy as submitted implicitly gives development plan status to the Hampshire Movement and Place Framework and Healthy Streets approach as set out in the Local Transport Plan 4. Those are untested documents and therefore planning decisions should have due regard to them, rather than necessarily comply with them. **MM23** corrects this.

283. In addition, minor adjustment to the wording of the reasoned justification requiring active travel and sustainable transport approaches is required. The policy should also refer to the rail network as appropriate, which it does not at present. **MM23** deals with both of these matters, which is necessary in the interest of effectiveness. It ensures soundness.

Policy T2 Parking for New Developments and Policy T3 Enabling Sustainable Transport Modes of Transport and the Design and Layout of Parking for New Developments

284. Policy T2 makes clear that parking provision for new development will be dictated through the design process rather than the application of parking standards. That will ensure that active travel modes are prioritised, whilst protecting the character of the District.

285. However, submitted Plan policies T2 and T3 have some overlap in relation to the design requirements for parking provision in new development. That causes confusion and lacks clarity. **MM24** and **MM25** deal with this, moving criteria associated with design of parking provision from policy T3 to policy T2, which is necessary in the interest of effectiveness.

286. **MM25** changes the name of policy T3 to 'Prioritising Active and Sustainable Modes of Travel' and includes only criteria associated with that policy intent. That policy intent would be delivered through the application of the principles of the design led approach set out in policy D1. Amendment to the reasoned justification is necessary to clarify this, also included in **MM25**.

287. Policy T3 requires development to prioritise active and e-mobility travel and car clubs. That is overly onerous and therefore **MM25** introduces some flexibility should it be demonstrated that this is not appropriate. Amendment in **MM25** also clarifies that all policy criteria should be met. All those changes are necessary in the interest of effectiveness.

Policy T4 Access for New Development

288. Policy T4 requires safe and attractive routes within and to development sites. It ensures that any access and internal arrangements are safe for all users, including off-site new junctions, whilst prioritising active and sustainable modes

of transport over the private car. For clarity and therefore effectiveness **MM26** moves criterion in relation to provision of servicing arrangements from policy T3 to policy T4.

289. In addition, it amends the requirement for the location of sites likely to generate large numbers of HGV movements to be accessible to the major road network, rather than in reasonable proximity and accessible, which lacks clarity.

290. All the changes in **MM26** are necessary to ensure that the suite of sustainable transport policies are effective and therefore sound.

Conclusion

291. Subject to the identified MMs I find that the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its approach to sustainable transport and active travel.

Issue 9 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to biodiversity and the natural environment.

Strategic Policy NE1 Protecting and Enhancing the Natural Environment in the District

292. Strategic policy NE1 sets an overarching framework for biodiversity and the natural environment. It recognises that the climate emergency and its nature crisis are intrinsically linked and that nature-based solutions are a key part of the Plan's strategy to tackle the climate crisis. The Plan's strategy as articulated through Strategic policy NE1, aims to protect and enhance the natural environment, providing requirements in relation to irreplaceable habitats, designated sites, the local ecological network and air and water environments.

293. This policy, together with NE3, NE9 and NE14 in particular, sets out the Plan's approach to protecting and enhancing the District's landscape and rural character. Winchester District Landscape Character Assessment 2022 [BNE19 and 20], underpins those policies in defining the distinct nature of the District's landscape. That study does not evaluate landscape or define valued landscape. However, the term valued landscape is not defined in national policy. The Plan's approach would extend protection to all landscapes including valued landscapes. In this respect, it accords with NPPF paragraph 180a.

294. As submitted Strategic policy NE1 refers to the prioritisation of brownfield land. That would not be consistent with the deletion of phasing in strategic policy H2 and the reasons for that. It makes no reference to the Hampshire Local Nature Recovery Strategy. The policy does not clearly set out requirements in relation to off-site mitigation and the reasoned justification, in setting out the need to

protect and enhance valued landscapes as a key issue for the District, its strategy is unclear.

295. **MM27** removes reference to the Plan's approach to prioritise brownfield land by phasing site allocations through the application of strategic policy H2, both in policy and reasoned justification. It introduces, in reasoned justification and policy, the Hampshire Local Nature Recovery Strategy as signposting opportunities to improve nature and setting local priorities for nature recovery.
296. It also adjusts strategic policy NE1(v) to confirm that mitigation off-site or a financial contribution in lieu of onsite mitigation will only be considered in limited circumstances where proposed mitigation is effective and deliverable.
297. It then adds, in the reasoned justification, reference to the need to recognise the complex interplay between landscape, the natural environment, historic features and cultural connections in protecting and enhancing values landscapes, which sets out the key issues for the District.
298. Related **MM121** adds 'ecological network' and 'District Licensing for Great Crested Newts' to the Plan's glossary which is necessary in the interests of effectiveness.
299. Those changes are all necessary to ensure that the Plan's strategy in relation to the natural environment, as articulated through Strategic policy NE1, is justified, effective and thereby consistent with national policy.

Policy NE2 Major Commercial and Educational and MOD Establishments in the Countryside

300. The District has a number of commercial and educational training establishments situated in the countryside. They employ a large number of people with a range of skills thereby significantly contributing to the local and regional economy.
301. This policy provides support for the adaptation and expansion of these sites to accommodate modern business need, in an effort to ensure their retention. That provides a justification for the inclusion of this policy in the Plan.
302. However, whilst the requirement for a masterplan to accompany any development proposal is justified in itself, the requirement for that to precede any application is unduly onerous. **MM28** therefore amends this requirement to ensure that a masterplan setting out how high quality design will be delivered forms part of any application.
303. **MM28** will ensure that this policy accords with Plan policy D5 and provides clarity to prospective applicants. It is necessary in the interests of effectiveness.

Policy NE3 Open Space, Sport and Recreation

304. This policy seeks improvements in the open space network and in-built recreation and sports facilities and allotments. It sets out locally derived open space standards which should be provided through new housing development.
305. The open space standards as submitted are for public landscaped areas, playing fields, parks and play areas alongside built sports facilities. That includes natural green space and informal open space. Those standards are derived from the extant plan, using a 4.0 hectare per 1,000 population metric. Those were reviewed in the Open Space Assessment [RL01]. They were compared to neighbouring authorities. Evidence confirms that development has generally delivered to meet those standards. Identified shortfalls are associated with larger typologies such as parks, recreation grounds, and sports facilities which are only capable of being delivered on large developments. That need has informed the Plan's site allocation requirements. On this basis I find the Plan's space standards reasonable and justified.
306. The Council's Open Space Assessment 2022 [RL01] lists, maps, categorises and quantifies important open spaces in and around towns and villages. It assesses whether there is a deficit or surplus in each category. That included school playing fields and involved consultation with local communities. Identified deficits are addressed in the Plan. Overall, I find the methodology adopted for that study robust and consistently applied.
307. **MM29** corrects the standard for sports halls, confirms the application requirements where loss of open space or built facilities is proposed and sets out the Council's aim to enhance and improve the quality of open spaces, particularly where deficiencies are identified, and to work with partner organisations in that endeavour. Those changes are necessary to ensure that the policy is justified, effective and consistent with national policy.

Policy NE4 Green and Blue Infrastructure

308. This policy aims to maintain, protect and enhance the function or the integrity of the existing green infrastructure and blue and green corridors and spaces. It sets requirements for well managed multi-functional, accessible green infrastructure and the requirement to safeguard and improve the quality, amenity, biodiversity and quantity of watercourses.
309. As submitted that policy lacks clarity in its requirements. It does not refer to the policies map, inaccurately refers to the River Itchen SAC designation as a national designation, does not consider impacts on the historic environment and is overly onerous in its requirements to protect and support specified non-motorised travel routes in the District.

310. **MM30** makes those changes to clarify that the River Itchen SAC is protected by an international as well as national designation (SAC). It introduces clarity in expressing the Council's likely reaction to proposals and links the policy to the policies map. It also expands requirements in relation to green infrastructure to include reference to the historic environment including Scheduled Monuments and Registered Battlefields. It includes other minor adjustments to improve clarity and provide appropriate flexibility in relation to the protection and support for proposals that facilitate future uses and enhancements for non-motorised travel routes in the District.

311. Those changes are necessary for effectiveness.

Policy NE5 Biodiversity

312. The Plan seeks to protect and enhance the District's rich biodiversity and habitats working in partnership with neighbouring authorities and other relevant bodies. To that end, policy NE5 seeks a minimum 10% biodiversity net gain, the protection of protected sites and supports nature based solutions in accordance with the mitigation hierarchy. That requirement has been tested through the Plan's Viability Assessment, which I have found robust and fit for purpose [LPV01-18]

313. As submitted the policy is out of date in relation to the Plan's strategic approach to air quality management. It requires a strategic assessment of the Plan to consider potential impacts from air quality. Given that this work has been completed and in accordance with the HRA Addendum, this requirement should be deleted [ED20, SD04a and b]. It does not include Compensatory Habitat Sites when addressing nationally protected sites or requirements in relation to functionally linked land.

314. In addition, requirements in relation to the Solent Recreation Mitigation Partnership (Bird Aware Solent) aimed to counteract impacts associated with net additional residential development are lacking detail and clarity, as are requirements in relation to the impacts on the Great Crested Newt population.

315. **MM31** amends policy wording and the reasoned justification to include requirements that unavoidable impacts to Functionally Linked Land and SAC compensatory habitats are appropriately avoided, mitigated or compensated in line with the mitigation hierarchy and will be subject to HRA. It also requires development within 500 metres of a Habitats Site, Compensatory Habitats Site or Functionally Linked Land to produce a construction environmental management plan to address potential impacts during construction.

316. In reasoned justification **MM31** explains the Great Crested Newt District licensing scheme, which is an alternative licensing option for developers to address impacts on Great Crested Newt populations. It sets out that using it could reduce risk and uncertainty in the planning process.

317. Those changes are necessary to ensure the policy is justified, effective and thereby consistent with national policy.

Policy NE6 Flooding, Flood Risk and Water Environment

318. This policy follows a sequential approach to flood risk management giving priority to sites with the lowest risk of flooding, ensuring flood risk is not increased elsewhere and applying the sequential and exception tests set out in NPPF. This is all in accordance with NPPF paragraphs 165-175.

319. However, as submitted it does not clearly set out the clear benefit of liaison with statutory undertakers in relation to the capacity of the public water and waste water infrastructure. It instead requires developers to fund upgrades completed prior to occupation of development. That is clearly overly onerous.

320. In addition, it does not recognise the impacts of flooding and flood risk measures on the historic environment. Moreover, it does not clearly set out the requirement for any flood risk management measures to ensure there is no net loss of floodplain storage capacity or obstruction to flood flow routes.

321. **MM32** makes changes to address these matters, in the reasoned justification and policy. Those changes are necessary in the interest of effectiveness and to ensure that the Plan is justified and therefore consistent with national policy.

Policy NE7 Settlement Gaps

322. This policy seeks to retain the generally open and undeveloped nature of defined settlement gaps in the District. It identifies settlement gaps and requires that development does not undermine the function of the gap or its intended role to define and retain the separate identity of settlements.

323. The concept of settlement gaps is a sub-regional policy embedded in the Partnership for Urban South Hampshire Policy Framework for Gaps 2008 [RP09]. That aims to ensure consistency across the sub-region in criteria for designation. This Plan identified nine settlement gaps, all of which are identified in the extant Plan.

324. The Settlement Gap Review [BNE29] sets out the methodology employed to review those settlement gaps. That study was carried out by consultants. However, the use of consultants for such studies is not uncommon and does not in itself diminish the study's robustness. Officer review informed the study's conclusions. Overall, I find the methodology employed to be logical, proportionate and justified.

325. The review was applied to seven of the nine existing settlement gaps. It excluded the Knowle/ Wickham/ Welborne and Littleton/ Winchester settlement gaps. That was the basis of local concern.

326. In respect of the Welborne Gap, the Welborne development at Fareham has planning permission. That is outside but very near to the boundary with the Plan area. The Welborne development is now being built out.
327. The importance of maintaining a settlement gap between the Welborne development and existing settlements, particularly Knowle and Wickham has been recognised within the Fareham Local Plan Part 3: The Welborne Plan [RP03]. Part, but not all, of land within the settlement gap nearest to Welborne is recognised as having potential to provide green infrastructure and open space in association with that development, the details of which are explained in the section of my report dealing with policy WK3. That matter, in association with the location and scale of development at Welborne, indicate that the existing settlement gap designation and planning framework ensure that the separation and integrity of Knowle and Wickham are maintained. Therefore, a review of this settlement gap would be very unlikely to result in any alteration at this stage. In this respect the study carried out is proportionate and sound.
328. The Littleton/ Winchester gap was excluded from this review as the master planning work for the Sir John Moore Barracks site allocation (policy W2) was underway. That site allocation sits within the settlement gap and includes an area of built development. The design work, including the master planning for that site allocation is progressing and will determine the extent of built development within the gap. That in turn will inform any future review of the settlement gap. That could involve changes to the settlement gap, either extensions or deletions. Given these considerations, I find the Council's approach justified. There is a clear logic that analysing the settlement gap as part of the study underpinning this Plan would be premature.
329. As submitted policy NE7 does not appropriately link the policy to the policies map. It does not explicitly refer to cumulative impacts of development on settlement gaps and does not require a review of the Welborne settlement gap when development is complete. That does not provide the necessary clarity for decision maker or applicant.
330. **MM33** addresses these points. Those changes are necessary to ensure that the policy is justified, effective and consistent with national policy.

Policy NE8 South Downs National Park

331. As submitted Policy NE8 aims to ensure that development near to the National Park conserves and enhances its natural beauty, wildlife and cultural heritage and promotes opportunities for the understanding and enjoyment of its special qualities, in accordance with the statutory purposes of National Parks.
332. However, the Levelling Up and Regeneration Act 2023 requires in exercising functions in relation to National Parks, to further the above statutory aims. That is not reflected in the policy or reasoned justification.

333. In addition, requirements in relation to development close to the National Park are not clear and the National Park Local Plan is incorrectly referred to.

334. **MM34** therefore explains changes brought about by the Levelling Up and Regeneration Act 2023, refers to development 'within the setting of the National Park' and correctly refers to the South Downs National Park Local Plan.

335. However as drafted **MM34** could be read as applying the statutory duty to development that takes place outside the designated area of the National Park. Therefore, I am changing **MM34** to require development within the setting of the National Park to have regard to the statutory purposes and duty for National Parks. That change does not significantly alter the policy or undermine the Plan's participatory process.

336. As modified, **MM34** is necessary to ensure that the policy is justified, effective and consistent with national policy.

Policy NE10 Protecting Open Areas

337. This policy seeks to protect open space within settlement boundaries with important amenity, biodiversity, heritage or recreational value.

338. As submitted the requirements do not provide appropriate flexibility in relation to school playing fields. **MM35** therefore sets out an exception to the policy in circumstances where the Local Education Authority has received approval for the loss of school playing fields where equivalent or greater benefits to the community are provided. This is necessary to ensure consistency with the School Standards and Framework Act 1988, and NPPF paragraph 99a, which states that local planning authorities should give great weight to the need to create, expand or alter schools.

339. During Plan preparation, as part of the Open Space Assessment [RL01], Parish Councils were asked to identify open spaces that are of particular importance to local communities. Some were identified through that process.

340. However, the Plan does not allocate Local Green Spaces. Specific Local Green Spaces could be identified and protected through Neighbourhood Plans. Such an approach would accord with NPPF paragraphs 105 and 106, which set out that the designation of land as Local Green Space through a local or neighbourhood plan allows communities to identify and protect green spaces of particular importance to them. I find the Plan's approach in this regard a proportionate and sound approach that accords with national policy.

Policy NE12 Equestrian Development

341. Policy NE12 aims to ensure that equestrian development which is generally associated with a countryside location, maintains and enhances the rural character of the area.
342. As submitted the policy includes reasoned justification that is covered elsewhere in the Plan. For clarity, that should be deleted.
343. In addition, requirements for a landscaping scheme are overly onerous. Greater flexibility is required. In addition, requirements for development to avoid an adverse impact on the appearance of the landscape are not clear. Clarity for the decision maker and applicant is necessary. **MM36** amends the policy and reasoned justification to address these matters, which is necessary in the interest of effectiveness.

Policy NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), SAC and Ramsar Sites of the Solent and River Itchen

344. This policy requires development not to adversely affect the integrity of designated sites. The results of the HRA [SD04a] indicate that, in terms of nutrients, this policy, in addition to Plan mitigation, would be effective in ensuring no adverse effects on designated sites through wastewater production.
345. As submitted, the policy lacks clarity of purpose. It also lacks clarity in relation to acceptable mitigation, in policy and reasoned justification. The reasoned justification does not refer to issues associated with nitrogen and phosphorous draining, fails to make clear that any nutrient mitigation scheme should be agreed with Natural England and does not refer to the Local Nature Recovery Strategy for Hampshire.
346. **MM37** deals with these matters. In the policy text it clarifies its intent, to deal with the impacts of overnight development. It also includes reference to a developer-provided on-site solution agreed with Natural England and/or a financial contribution towards a strategic mitigation scheme. Whilst other off-site solutions are not supported, such an approach accords with Natural England's advice (NE776 'Nutrient Neutrality and Mitigation') and its nutrient mitigation scheme, both of which confirm that mitigation measures designed at a catchment level are more effective, deliverable and cost effective when implemented strategically rather than on a site-by-site basis.
347. The reasoned justification is amended to refer to the impacts of phosphorous and nitrogen draining, provide additional information on mitigation measures, sets out the requirement for Natural England agreement and introduces the Local Nature Recovery Strategy for Hampshire. Those changes are all necessary to ensure that the policy is justified, effective and consistent with national policy.

Policy NE17 Rivers, Watercourses and their Settings

348. This policy seeks to control development that affects rivers, watercourses and their settings.
349. As submitted, the policy and reasoned justification needs to be updated in accordance with the HRA (SD04a and b), in relation to the requirement for project level HRA and identified mitigation or compensation in line with the Solent Wader and Brent Goose Strategy and in relation to water quality and quantity impacts on SAC compensatory habitats on the River Meon, River Dever, River Dun, Bourne Rivulet, and River Test.
350. In addition, as submitted, the policy does not provide guidance on the ecological survey requirement to confirm the classification of a site, which is necessary for clarity. It also does not grapple with a requirement for buffer zones between built development and river/watercourse banks; a requirement necessary to enable the river/watercourse environment to flourish.
351. All those changes are introduced through **MM38**, which is necessary to ensure the policy is justified, effective and thereby consistent with national policy.

Conclusion

352. Subject to the identified MMs, the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its approach to biodiversity and the natural environment.

Issue 10 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to the historic environment.

Strategic Policy HE1 Historic Environment

353. This policy sets the Plan's overarching approach in relation to the historic environment. It emphasises the importance of sustaining and enhancing heritage assets, whilst enabling viable uses that support their long term conservation. It recognises the economic and social value of heritage assets in creating sustainable communities and seeks to ensure that new development positively contributes to local character and distinctiveness.
354. The Plan's suite of heritage policies have an emphasis on conservation rather than preservation. Policies are numerous, long, and there is some repetition between them. Although some are general in approach, each has a specific focus. However, the Plan's general approach accords with national policy and provides development plan status to requirements. Any repetition does not go to the heart of soundness.

355. However, policy HE1 inaccurately refers to registered Parks and Gardens, in its reasoned justification. **MM39** corrects that, which is necessary in the interest of clarity and effectiveness.

Policy HE2 All Heritage Assets (both designated and non-designated)

356. This policy requires proportionate assessment of the significance of any affected heritage assets, including the contribution made by their settings. However, this is not clearly explained. A number of amendments to the reasoned justification are necessary to provide clarity on the need for a heritage statement and what it should cover.

357. In addition, requirements in relation to Buildings at Risk lack clarity. To provide this, policy HE2 should be amended to ensure that a schedule of works is submitted with any application setting out details of repairs needed to improve the condition of the building to enable its removal from the Council's Buildings at Risk Register or Historic England's Heritage at Risk Register. **MM40** addresses both points. That is necessary to ensure that the policy is effective.

358. Subject to **MM40** I find this policy soundly based.

Policy HE3 Designated Heritage Assets

359. This policy sets out how the Council will deal with proposals involving designated heritage assets implementing national policy. It attaches great weight to the conservation of a designated heritage asset, identifying any harm to significance, attaching weight to that harm and appropriately weighing that against public benefits. In that regard, giving that approach development plan status, it is a justified policy approach.

360. However, to make it effective the footnote setting out what is meant by the highly graded designated assets should be corrected to accord with NPPF paragraph 206. **MM41** corrects this and is necessary to ensure that policy HE3 is effective and consistent with national policy.

Policy HE6 Scheduled Monuments and Nationally Important Non-Designated Assets and Policy HE7 Non-Designated Archaeological Assets

361. Policy HE6 focusses specifically on scheduled monuments and non-designated archaeological assets. This is not clear in the title, so this is changed by **MM42**. It also sets out that non-designated assets of archaeological interest, demonstrably of equivalent significance to scheduled monuments, will be assessed against policies for designated heritage assets.

362. At present the policy and reasoned justification does not explicitly prioritise avoidance as a preferred approach. **MM42** addresses this, by putting this requirement at the start of the policy. It also sets out that where harm is

unavoidable proposals should explain why and outline steps taken to minimise harm, which provides appropriate flexibility. Finally, it refines policy wording to ensure that proposals that may affect a scheduled monument and/ or its setting are notified to Historic England.

363. However, the first paragraph of **MM42** lacks clarity in stating '... by avoiding locating development on sensitive areas ...'. I am therefore making a small adjustment so that it reads as '... by avoiding locating harmful development on sensitive areas ...'. That will ensure appropriate flexibility for proposals that would not affect the significance of scheduled monuments or archaeology. That is necessary to ensure the policy accords with national policy and is effective. That change post consultation would not significantly alter the policy or undermine the associated participatory process.
364. Policy HE7 sets out assessment criteria for non-designated archaeological assets. It provides detail on the way in which archaeological assets that are not of national importance will be assessed.
365. At present the policy sets out that it applies, in addition to Plan policies that apply to all heritage assets and non-designated assets. That is confusing and for clarity should be deleted. **MM43** therefore deletes this, along with other repetition within the policy.
366. All those changes are necessary to ensure the Plan's policies in respect of scheduled monuments and non-designated archaeology are justified, effective and consistent with national policy. Subject to **MM42** and **MM43**, I find them soundly based.

Policy HE9 Change of Use to Listed Buildings

367. This policy sets out that changes of use to listed buildings will be assessed in accordance with national policy on optimum viable use to sustain their conservation ensuring that such proposals are considered comprehensively. The aim of the policy is to ensure no harm or that any necessary harm is fully justified.
368. Policy wording does not effectively achieve this, and by reordering the policy criteria the policy intent is much clearer. **MM44** therefore does this, which is necessary for clarity and effectiveness.

Policy HE10 Development in Conservation Areas and Policy HE11 Demolition in Conservation Areas

369. Policy H10 seeks to ensure that development in conservation areas preserves or enhances character or appearance of the conservation area. That is not clear in the policy text. In addition, explanation of significance of conservation areas is

unclear. **MM45** corrects this. It also refines wording to ensure energy efficiency measures are sensitive to the special character and appearance of the area.

370. Policy HE11 sets out the way in which proposals for demolition in conservation areas will be assessed. Again, the explanation of significance is not clearly expressed and is corrected by **MM46**. Changes in **MM45** and **MM46** are necessary to ensure clarity and therefore effectiveness.

Policy HE12 Registered Historic Parks and Gardens

371. This policy relates to both nationally and locally registered historic parks and gardens. It encourages a positive conservation strategy and management plan approach.

372. At present it deals with the two types of parks and gardens together and does not set out the policy response to each. **MM47** does this, and changes the name of the policy accordingly, which is necessary in the interest of effectiveness.

Policy HE14 Improvements and Alterations to Improve Energy Efficiency of Historic Assets

373. This policy sets out criteria against which energy efficiency improvements or alterations to heritage assets will be assessed. **MM48** ensures the policy title reflects this intent and that a whole building approach to energy efficiency is taken, avoiding harm as a preference and justifying unavoidable harm. That change is necessary to ensure that the policy is justified, effective and consistent with national policy.

Conclusion

374. Subject to the identified MMs I find that the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its approach to the historic environment.

Issue 11 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to creating a vibrant economy.

Strategic Policy E1 Vibrant Economy

375. Strategic policy E1 sets out the Plan's economic strategy to meet identified employment land needs. That relies on two studies: The Employment Land Study 2024 [VE08] and Winchester Town Centres Study (2024) [VE02] and VE03], both updates of previous reports dating from 2020 [VE09 and VE05 and VE06].

376. The Employment Land Study and Town Centres Study used different methodologies to calculate employment land need; one based on past trends

and one based on jobs growth, which is a reasonable estimate of future economic growth. Those studies were prepared in accordance with the NPPF and PPG. Overall, they are proportionate and their findings robust.

377. Those together, conclude a need for 27.6-38.9 hectares of employment land for the District between 2022-2040; the lower estimate based on past trends; the higher figure based on an estimate of economic growth.

378. The Plan provides for about 39.36 hectares of employment land. That is made up of previous commitments and site allocations in this Plan; the latter accounting for about 17 hectares of employment land. That figure is estimated, given the exact layout and type of uses is not yet determined. Need would therefore be met.

379. In terms of the type of employment land required, the evidence⁷ identifies a need for between 3.3 hectares and 12.2 hectares of land for offices (use Class E(g)). Estimated supply through this Plan would be just over 17.29 hectares.

380. In terms of industrial and warehousing land (use Classes B2 to B8), again need would be met, taking account of supply on land where use is as yet undetermined. Given my findings in relation to the soundness of site allocations yielding employment land, under issues 12-14 of this report, I find the Plan's approach to employment land supply to be soundly based.

381. However, **MM59** to strategic policy E1 is necessary to ensure accuracy and therefore effectiveness. It amends a typographical error confirming a need for 27.6-38.9 hectares of employment land for the District. In addition, it makes a consequential amendment to reflect **MM82** in relation to policy SH4, which provides greater flexibility to the type of uses supported. It confirms in tabular format that Solent Business Park (policy SH4) will provide about 2 hectares of employment land.

Strategic Policy E2 Spatial Distribution of Economic Growth

382. This policy sets out the way in which the Plan's identified employment land need will be met. It confirms the locations where employment land is specifically sought or is likely to come forward. It also sets out the different approaches to new economic development in the Plan's three identified spatial areas, which recognises that Winchester is the main economic centre in the District and focus for education, administration and regional and local government.

383. In the South Hampshire Urban Area, which is the Plan's major source of modern large scale business development within the District, the Plan supports

⁷ The Employment Land Study 2024 [VE08] and Winchester Town Centres Study (2024) [VE02] and VE03], both updates of previous reports dating from 2020 [VE09 and VE05 and VE06].

committed site development. That recognises the area's role to contribute to the PfSH strategy of improving economic performance in the wider sub-region.

384. In the Market Towns and Rural Area it encourages opportunities to diversify the economy in a way that reinforces the role of settlements for local employment and important service centres. No new allocations are proposed. Overall, as development is targeted at the most sustainable settlements the policy approach accords with the Plan's spatial strategy as set out in strategic policy SP2.

385. However, requirements in relation to the Market Towns and Rural Area need more clarity. **MM60** provides this, setting out the approach to support appropriate growth and retain land for employment uses within settlements in accordance with strategic policy SP2, dealing with the Plan's spatial strategy. That change is necessary in the interests of effectiveness.

Strategic Policy E3 Town Centres Strategy and Hierarchy

386. Strategic policy E3 sets out the Plan's town centre strategy and hierarchy. That relies again on the Employment Land Study 2024 [VE08] and Winchester Town Centres Study (2024) [VE02 and VE03]. Those provide the most up to date forecasting for additional retail and other town centre uses. The findings take account of Winchester Town Centre regeneration sites and the changing economic landscape and updated expenditure forecasts. They provide compelling evidence of the type of town centre uses required District wide and by centre.

387. The above evidence base studies conclude a need for 395sqm additional convenience floorspace and 741sqm additional comparison floorspace over the Plan period. It identifies that the extant town centre hierarchy is still appropriate, as are identified local centres. It reaffirms the 350sqm impact threshold for retail and leisure uses located out of centre.

388. As the identified need is so small there is no requirement to allocate additional land or expand the boundaries of town centres. Therefore, the Plan's approach set out in strategic policy E3, is to enable flexibility in respect of town centre uses, particularly in light of recent social, economic and legislative changes which require town centres to change and adapt.

389. Strategic policy E3, thus seeks to maintain and enhance the role of centres, meet identified need within Plan site allocations (policy W7 Central Winchester Regeneration in particular) and new development within identified town centres. It provides support for main town centre uses, the nighttime economy, encourages residential and commercial uses above town centre ground floor uses setting out criteria against which development will be assessed.

390. As submitted the policy reasoned justification incorrectly sets out the retail capacity findings of the two main evidence base studies. **MM61** corrects these errors and is necessary to ensure the policy is justified, effective and thereby consistent with national policy.

Policy E5 Enhancing Employment Opportunities

391. This policy provides support for a wide range of employment uses, particularly traditional employment uses in the industrial or office uses, in accordance with the Plan's spatial strategy.

392. However, as submitted requirements fail to recognise other uses that are not sui generis but are employment and business led such as academic institutions, each being dealt with on a case by case basis. **MM62** deals with this in the reasoned justification and policy. That change is necessary to ensure that the policy is justified, effective and consistent with national policy.

Policy E6 Retaining Employment Opportunities

393. This policy sets out considerations that apply in assessing proposals that involve the loss of employment land or floor space. At present the policy sets out the need to assess the benefits of existing against proposed uses. That is part of the planning balance and for clarity, should be deleted. **MM63** does this and includes consequential changes to ensure that all considerations are in play in assessing proposals.

394. Those changes are necessary to ensure that the policy is justified, effective and consistent with national policy.

Policy E7 Maintaining the Vitality and Viability of Town Centres

395. This policy seeks to maintain the vitality and viability of town centres. It supports the retention of existing retail and other town centre uses and resists their loss, requiring justification for any loss of retail or other Class E uses in primary shopping areas. However, that policy intent is not clear in the policy wording. **MM64** therefore amends the wording of the policy to make this clear.

396. In addition, **MM64** clarifies the requirement for supporting viability evidence, to assess impact on vitality and viability of the town centre, confirming they will always be required for the loss of a Class E use in a primary shopping area.

397. Those changes are required to ensure clarity and therefore effectiveness.

Policy E8 Local Shops, Services and Facilities

398. This policy supports new, extended and improved facilities and services in accordance with the Plan's spatial strategy and town centre hierarchy. It also sets out the approach to any loss.

399. However, requirements in relation to new shops, pubs and cultural services attracting visiting members of the public from a wider area are not clear. Amendment is required to clarify the need for those uses to be located in accordance with the Plan's town centre hierarchy and the appropriate application of the sequential test as set out in Plan policy E4.
400. **MM65** addresses this point, which is necessary to ensure that the policy is justified, effective and consistent with national policy.

Conclusion

401. Subject to the identified MMs I conclude that the Plan has been positively prepared and is justified, effective and consistent with national policy in relation to its approach to creating a vibrant economy.

Issue 12 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy with regard to the site allocations in Winchester Town.

Policy W1 Barton Farm Major Development Area

402. This is an allocation in the extant Local Plan for about 2,000 dwellings and supporting uses. The site benefits from an extant planning permission for that development. That includes a comprehensive access strategy which incorporates the diversion and rerouting of Andover Road between Wellhouse Lane and Park Road through the new development [Appeal Reference APP/L1765/A/10/2126522].
403. Negotiations between the developer and the Highway Authority regarding the trigger mechanism for delivering the new spine road have recently taken place. However, the developer has confirmed that there is no intention to seek alteration to that extant planning permission, now being implemented.
404. There is some local opposition to the proposed highway arrangement. However, that matter was fully aired when the Council made its decision on the planning application. It was reconsidered by the Secretary of State at appeal. Some aspects of that decision were then retested in the Courts. It is not within my gift to amend that Decision. On that basis I do not pursue this matter further as part of the examination into the submitted Plan.
405. Although the site is currently being built out, as development is not complete inclusion of this policy in the Plan is justified. Policy requirements address constraints and provide for a high quality development. However, in relation to development of the northern part of the site, where groundwater levels can be very high, a requirement for early discussion with the Lead Local Flood Authority is necessary.

406. In addition, a requirement to ensure future access to underground infrastructure is necessary. **MM67** addresses these points and is required to ensure the policy is justified, effective and consistent with national policy.
407. The site is being built out in four large phases. Phase 1 is complete and occupied. Phase 2 is partly complete and occupied. Phases 2B (291 dwellings) and 3A (208 dwellings) are now being built out. Reserved Matters applications have been submitted for Phase 3B (120 dwellings) and pre-application discussions are underway for Phase 4. In May 2025, at the time of the hearings 680 homes were occupied.
408. It is accepted that delivery has been slower than anticipated in the early phases (2019-20 to 2022-23). However, those earlier phases delivered significant infrastructure including the spine road which would account for slower delivery. The 2023/24 AMR confirms delivery of 133 dwellings. [ED03b]
409. The housing trajectory includes delivery of 115 dwellings per year to 2035/6. Given past delivery and extant planning permissions that delivery appears reasonable. In addition, given construction is underway, evidenced developer activity and extant planning permissions, inclusion of nearly 575 dwellings in the first five years of the Plan's housing requirement period is justified. Evidence was submitted to indicate that sales and asking prices are being met and no substantive evidence is before me to indicate that delivery would decrease to maintain asking price. No other barrier to delivery of this site within the Plan housing requirement period is identified. Subject to **MM67** it is soundly based.

Policy W2 Sir John Moore Barracks

410. This site is currently an operational military base. It is proposed for allocation to accommodate 700-1,000 dwellings. It would include a park and ride facility for 850 spaces with a dedicated bus route into Winchester.
411. The site is about 86 hectares, accommodating some built development, and open green space, some of which includes mature planting. Some is of landscape and conservation value.
412. Situated between the settlements of Littleton and Harestock, it is close to the built up area of Winchester Town. Approximately half of the site is situated within the Winchester/Littleton settlement gap. Any development would need to accord with Policy NE7, in relation to settlement gaps.
413. A concept masterplan [ED12], agreed by the Council, indicates a site capacity of about 900 dwellings, concentrating development mainly in the central parts of the site which are already built on. About 40% of the site would be built development, 60% would remain as open space. The scale of development envisaged would result in appropriate remaining valuable open space and

planting. It would also be sufficient to enable appropriate conservation of the Candidate Site of Importance for Nature Conservation.

414. Whilst the site allocation sits within the settlement gap and includes an area of built development, the design work, including the master planning for this site allocation is progressing and will determine the exact extent of built development within the gap. However, given the existing development on the site, the site's visual and physical separation from its surroundings by woodland, the lack of intervisibility between Littleton and Harestock, associated with the scale of development proposed, coalescence between Littleton and Winchester would be unlikely to result.
415. The design work for the site will inform any future review of the settlement gap. That could involve changes to the settlement gap, either extensions or deletions. Given these considerations, I find the Council's approach to review the settlement gap when the site is built out justified. However, once built out any future review of the Plan should therefore include a review of this settlement gap.
416. The Level 2 Strategic Flood Risk Assessment (SFRA) identifies an unnamed river that flows through part of this site. It is referred to in policy W2 as a winterbourne, being a stream that flows after heavy rainfall. The Environment Agency's flood risk map and occupier observation indicate areas of surface water after prolonged and heavy rainfall. This suggests the site is subject to groundwater flooding which occurs once the water table exceeds ground level in low spots. Regardless of the type of flooding that occurs on the site, the site is large enough to accommodate attenuation that might be required. Flooding issues therefore are not a constraint to the quantum or mix of development proposed in this site allocation.
417. The site includes some playing fields which do not have public access. Any proposal will need to be assessed against other Plan policies including policy NE3 which has a presumption against the loss of any open space, sports or recreation facilities. Policy criteria deal with the potential to retain and open to the public the existing gym, leisure facilities and swimming pool.
418. The Strategic Transport Assessment [ST15] modelled the proposed development on the basis of Andover Road being closed to traffic. It took account of other Plan site allocations and committed developments which would include Barton Farm development. No unacceptable impact has been evidenced.
419. Existing site access is off Andover Road. Proposed access would be too. Sufficient space is available to ensure the landscaped setting of Andover Rd is maintained. Details of the exact access arrangements and off-road cycle ways would be managed through the development management process, assessed against the Plan when read as a whole.

420. Although not required to make the development acceptable in planning terms, the provision of a park and ride site as part of this development, in association with the redevelopment of city centre car parks, would further the Plan's aim to reduce city centre traffic, improve air quality and mitigate the climate emergency. The Strategic Transport Assessment and Winchester movement strategy [ST15 and ST01] identified the need for a park and ride facility to the north of Winchester Town. For these reasons, the provision of a site for a park and ride at this site is a justified part of any proposed development.
421. The policy as submitted indicates an allocation for mixed use with a park and ride. Given the type of development sought, it should confirm a residential led scheme is required. In addition, as a concept masterplan now provides evidence of the number of dwellings that can be accommodated, the indicative number should be confirmed as about 900. That requires consequential changes to the reasoned justification. Those changes are brought about by **MM68**, which is necessary to ensure that the policy is justified and effective.
422. **MM68** also provides clarification of the name of the road onto which access would be taken, which is necessary to provide clarity. For the same reason, the policy should confirm that the nursery on site is a former nursery and for clarity provide more detail on requirements in relation to the leisure facilities on site.
423. In relation to the park and ride facility requirement, reasoned justification needs to be amended to confirm its provision should be considered as part of the master planning exercise, including demonstrating its relationship with the park and ride facility associated with the Barton Farm development (policy W1) on the opposite side of Andover Road. That should form part of any planning application and is set out in **MM68**.
424. Finally, a requirement should be added to ensure that development demonstrates how it responds positively to the settlement gap between Winchester and Littleton and commit the Council to review the settlement gap once development is built out.
425. Those changes, all done through **MM68**, are necessary to ensure that the policy is justified, effective and consistent with national policy.
426. However, following consultation responses to my MMs, I am convinced that **MM68** lacks clarity in its requirement for land for a park and ride facility. In addition, its requirement for full details of the park and ride facility at planning application stage is overly onerous. Therefore, I am amending the wording of **MM68** to provide the necessary clarity.
427. I am changing policy wording at W2 (xix) to require details as opposed to full details to be submitted as part of the planning application process. I am accordingly changing the reasoned justification to confirm that the requirement is for appropriate land for an operational park and ride facility and to contribute to

the delivery of that facility as appropriate and that the scale/height/capacity/quantum, access and connectivity should be submitted as part of the planning application process. Those changes would not significantly change the policy or undermine the participatory process.

428. The Defence Infrastructure Organisation confirms an Implementation Order has been made requiring the existing training facility to be relocated and vacant possession of the site by September 2026. Significant design and community engagement work has already taken place. A timetable for work to achieve planning permission is before me, with an expectation that work will commence on site in late 2028/29. The site is in single ownership with existing access and services, requiring straightforward demolition. No barrier to development has been identified. Subject to **MM68**, the site allocation is soundly based.

Policy W3 St Peter's Car Park

429. This is a Council owned site currently used as a car park on North Walls in Winchester Town Centre. It is proposed to allocate this site for about 30 dwellings.
430. Given the site's location within a compact historic setting, there is opportunity to improve the setting of the southern part of the Winchester Conservation Area and nearby listed buildings. **MM69** makes this clear and refers to critical heritage documents to assist. Those requirements provide necessary clarity.
431. The site is located close to a flood risk area and historically has high ground water levels. The Council has worked with the Environment Agency to formulate policy requirements to address this constraint. The policy requires a site specific flood risk assessment, design to address high groundwater levels using sustainable urban drainage systems and exploring options to de-culvert the watercourse on the site. However, reference in policy text of the need for water compatible or essential infrastructure only within Flood Zone 3b is necessary to ensure a safe development. That is done by **MM69**. **MM69** is necessary to ensure that the Plan is justified, effective and consistent with national policy.
432. No barrier to development has been identified. Evidence suggests that it would be developed towards the end of the Plan's housing requirement period. Subject to **MM69** the policy is soundly based.

Policy W4 Land West of Courtenay Road

433. This is a greenfield site located near to Barton Farm development and therefore close to the Winchester Town centre. The Barton Meadows Nature Reserve which is an important corridor for wildlife is beyond a tree belt to the north of the site. It is proposed to be allocated for about 150 dwellings and public open space.

434. The site promoter has undertaken capacity work which justifies the suggested capacity, having regard to site constraints, including the Kings Worthy/Headbourne Worthy settlement gap, proximity to the railway line, biodiversity, access, traffic impacts and open space provision. As development would be well-contained and would not extend the built-up area beyond its current northern boundary, the openness of the settlement gap would not be materially diminished.
435. Compelling evidence is before me to confirm that this site is not included in the area earmarked for Barton Meadows Nature Reserve provided in association with the Barton Farm development (policy W1). [Appeal reference APP/L1765/A/10/2126522].
436. At present the site boundary includes the tree belt to the north of the site which forms part of the Nature Reserve. Given that and the presence of bats, it should be removed from the site allocation to ensure that the integrity of the Nature Reserve is enhanced through development. In addition, given the proximity of the site to the Barton Meadows Nature Reserve, clarification of the requirement to enhance the integrity of the Reserve and manage access is necessary.
437. In addition, the pedestrian access to the rear of properties in Courtenay Road should be deleted from the site, as it is not required for the purposes of this allocation. This is done through **MM70**.
438. Resultant traffic flows have been modelled. Traffic flows that would be generated either alone or in combination with other site allocations would not be severe. The site access is capable of supporting the development proposed and now benefits from a new pedestrian crossing on Worthy Road. **MM70** therefore clarifies that necessary transport improvements rather than off-site junction improvements are necessary.
439. **MM70** also confirms the need for development to provide for social and physical infrastructure needed to make development acceptable in planning terms. All those changes are necessary to ensure that the policy is justified, effective and consistent with national policy.
440. No barrier to development has been identified. Evidence suggests that it would be developed towards the end of the Plan's housing requirement period. Subject to **MM70** the policy is soundly based.

Policy W5 Bushfield Camp

441. This is an allocation in the extant Local Plan, updated and reallocated in this Plan.
442. The site includes some 43 hectares of which some 20 hectares is proposed to be developed for employment uses, specifically high quality flexible business

and employment space, an innovation hub and creative industries. That development is proposed to be developed through the implementation of a masterplan for the whole site.

443. The site lies on the edge of Winchester Town, close to the built up area, near to the strategic highway. It is situated within the Winchester/Compton Street settlement gap and close to the National Park. It has a whole range of constraints. Its topography means it is visible from a wide area, and any development needs to conserve the historic setting of Winchester Town and its wealth of heritage assets.
444. Situated near Winchester Town built up area, it is accessible to the wider community by different modes of transport and active travel. Its allocation would therefore accord with the Plan's spatial strategy set out in Plan strategic policy SP2. Requirements preclude main town centre uses or those that would be likely to adversely impact similar uses in Winchester Town Centre.
445. The need for the nature of uses proposed is evidenced in the Employment Land Study 2024 [VE08]. This includes 3.3-12.2 hectares of office space.
446. This allocation is the only major Plan employment allocation. An allocation of this size would have the potential to improve the range and type of jobs available in the District and complement those in the Town Centre. It would provide 11.8 hectares of employment land to meet identified needs. For all these reasons the proposed use is justified by the evidence.
447. Whilst the site does not explicitly define the amount of employment uses, it does restrict it to that part of the site previously developed and used as a military camp. That approach would provide appropriate flexibility to meet policy requirements through the master planning process.
448. Transport impacts will need to be mitigated. The developer is currently in negotiations with National Highways to model junctions where detrimental traffic impacts are identified. No evidence is before me that mitigation of impacts is not possible. Policy W5(vi) would ensure appropriate mitigation. In addition, policy W5(v) requires infrastructure for active forms of transport which, together with its location close to Winchester Town built up area, will help to reduce reliance on the private car and associated impacts.
449. A concept masterplan has been agreed with the Council (21 June 2023) [ED48a]. An outline planning application has been submitted awaiting determination (23/02507/OUT). However, the process for securing a masterplan is set out within policy which provides clarity for the process of its production and its status in the development management process.
450. The masterplan supporting the outline planning application promotes a landscape/heritage led approach to the site. The masterplan and associated

evidence [ED48a and ED48b] including the application design and access statement (23/02507/OUT) provides assurance that the nature and scale of development proposed can be accommodated on the site, in principle, avoiding unacceptable harm to identified site constraints.

451. The site has a long planning history, including applications for designation as an Asset of Community Value and Town and Village Green. However, none of those designations persist today. I acknowledge that the site provides an important green space area of significance to the local community. The proposed allocation would retain a significant area of open space. Any development will need to accord with policy requirements alongside other Plan policies, including policy NE5 dealing with biodiversity.
452. The built heritage on the site, particularly in the area previously used as a military barracks, has been assessed. That has concluded none are of significance to warrant protection. Built heritage therefore is not a constraint to development of the site.
453. Today the whole site is extensively used by the community for walking and outdoor pursuits. That includes the area proposed for development, which is confined to the 20 hectare area previously used as a military camp. However, that part of the site is not formally accessible to the public and that matter limits the weight I attach to its use by the community.
454. The site is close to the River Itchen SAC. The HRA previously indicated development at Bushfield Camp as having the potential to have a significant effect on this SAC and in combination on other designated sites. During Plan preparation Natural England advised that it had specific concerns relating to how the Plan had addressed air quality on the natural environment with particular reference to this site allocation.
455. An air quality assessment was carried out as part of the HRA [ED20]. That concluded it is unlikely that the Local Plan in isolation and in combination will have an adverse effect on integrity of the River Itchen SAC.
456. An outline application has been prepared and submitted to the Council. That demonstrates active developer interest which has included significant investment to date. Therefore, there is a reasonable prospect that the site will be delivered within the Plan period.
457. As submitted policy W5 needs to be updated in accordance with the HRA addendum and its air quality assessment [ED20, SD04a and b]. **MM71** therefore deletes the requirement for an air quality assessment associated with increased traffic generated by the development.
458. **MM71** also amends the reasoned justification to clarify what will be required to avoid nutrient impacts on protected sites in the event that development includes

overnight or residential accommodation. It confirms the need for assessment of impacts on the River Itchen SAC should any necessary nutrient mitigation include on site waste water treatment works.

459. Given that the proposed allocation has limited sewerage infrastructure at present, occupation of the development should align with the delivery of sewerage infrastructure. Whilst the 'live' planning application includes an onsite waste water treatment works within its first phase, that has yet to be determined and given the view of the statutory undertaker this requirement is reasonable. **MM71** addresses this.

460. Given the site allocation's proximity to the National Park, **MM71** also includes its boundary on the Plan site and wider context diagrams. **MM71** is required to ensure the policy is justified effective and consistent with national policy.

461. Subject to **MM71**, I find this allocation to be soundly based and no barrier to its development within the Plan period is evidenced.

Policy W6 Winnall

462. This site includes a collection of employment premises and activities with access to the M3, close to the centre of Winchester. It is allocated in the extant Plan. At present vacancy rates are low. It is close to housing, the National Park, River Itchen SAC and Site of Special Scientific Interest.

463. This allocation aims to ensure the retention of existing industrial type uses and the creation of additional Class B2 and B8 floorspace in the core area of the site (sub areas 1 and 2). It allows some flexibility in the outer edges (sub areas 3 and 4) where vitality and viability would be supported. However, it precludes out of town destination retail and other recreational proposals.

464. Given that this is the main employment area in Winchester, and evidence confirms no demonstrable need to allocate sites for retail, leisure and other main town centre uses [VE02, VE03] this is a justified approach. Further flexibility would diminish the policy's aim. In any event should such proposals come forward they would be assessed against other Plan requirements which would include policy E4 dealing with main town centre uses out of centre and the requirement for a sequential test as appropriate.

465. As submitted the aim of the policy is lacking clarity, particularly its relationship with Plan policy E6 dealing with retention of employment land and premises. This allocation is close to the National Park, and therefore the Plan site and wider context diagrams should include the boundary of that designation.

466. In addition, given historic sewer capacity constraints a requirement for occupation of development to align with delivery of sewer capacity is necessary as is a requirement to enable future access to any infrastructure. **MM72** deals

with all these points. Those changes are necessary to ensure the policy is justified, effective and consistent with national policy.

467. There is active developer interest in this site and no barrier to its development within the Plan period is evidenced. Subject to **MM72** it is soundly based.

Policy W7 Central Winchester Regeneration

468. This is a large, mainly Council owned Winchester Town centre site within the historic core. It is an allocation in the extant Plan. This allocation amends the boundary of the extant allocation to include additional land to the north. It requires about 300 dwellings as part of a comprehensive mixed use development.
469. The Central Winchester Regeneration Supplementary Planning Document (SPD) 2018 [ED49] sets out a vision, objectives and a planning and urban design framework to guide development to ensure it is coordinated, sustainable and achieves the highest standards of architecture and urban design. That work was informed by community engagement.
470. That document establishes on the basis of an analysis of constraints and opportunities and an assessment of the context, the quantities, types and disposition of land uses within the regeneration area, alongside site specific guidance on public realm, movement and accessibility, heights, scale and massing, views and skyline, heritage including archaeology and an exploration of the special character of the locality that should inform any design solution. That document is agreed by the Council. The boundary of the site allocation accords with that document.
471. Given the substantial amount of design work that has taken place to date, the matters covered and guidance provided and that most of the site is Council owned, little is to be gained from requiring a concept masterplan to further guide development. The SPD would enable the site to come forward in phases furthering the urban design principles set out within it.
472. As submitted the policy is confusing as to the requirement to have regard to the Central Winchester Regeneration SPD. **MM73** clarifies this.
473. In addition, the requirement for proposals to relate to the whole of the allocated site and not prejudice the implementation of the masterplan is confusing as no masterplan is required in policy. Moreover, it is overly onerous and could significantly delay the development of smaller sites. **MM73** therefore deletes this requirement.
474. **MM73** also requires infrastructure needed to make the development acceptable in planning terms, including educational provision, a change necessary to ensure sustainable development.

475. The site will require a site specific flood risk assessment. The policy at present requires a strategic flood risk assessment. This is corrected by **MM73**. All the changes in **MM73** are necessary to ensure that the policy is justified, effective and consistent with national policy.
476. The Council has appointed a developer partner. It is anticipated that the site will be developed in two phases. Its development delivery plan was approved by the Council in February 2025, with an anticipated planning application submitted in early 2026. Much of the first phase is Council owned with leases due to expire in 2026/2027. No Compulsory Purchase proceedings are currently required.
477. Whilst this is a brownfield urban and complex site that has a long history of failed development attempts, I am satisfied that firm progress is being made towards the submission of a planning application. Given evidence of the developer partner's intentions and anticipated start and build out dates in its development delivery plan, I am satisfied that it could be developed within the Plan housing requirement period, providing 50 dwellings within the first five years after adoption of the Plan. Subject to **MM73** this allocation is soundly based.

Policy W8 Station Approach Regeneration Area

478. This site includes the area around the station, the Carfax site, Cattlemarket car park and a swathe of vacant and underused sites. It is proposed for allocation to provide 250 dwellings in a mixed use scheme, with a primary aim to improve the sense of arrival to Winchester Town, improve access to the Town centre, and integrate the site with it. It is an allocation in the extant Local Plan.
479. The site is currently in multiple ownership with the Council being a major landowner. Given the landownership and other identified constraints, the site is defined in a broad way to enable a comprehensive approach to be taken. The exact site boundary will be defined by the master planning approach. Given the site specific circumstances relating to this site, this approach is justified.
480. Following the Plan's concept master planning approach which includes community engagement, the Council has worked with landowners. A concept masterplan was agreed by the Council in June 2025. A phasing strategy sets out the various landowners' ambitions and timescales to bring development forward, front loading the Council owned sites.
481. The Plan confirms the opportunity to relocate the bus station from the Westgate part of Winchester Town to the station area. The ambition to achieve an integrated transport hub is a Council aspiration at this stage, rather than intention set out in plan paragraphs 5.55 and 5.59. Work is ongoing, through the Winchester Movement Strategy to understand capacity to redevelop Town centre car parks and understand how sustainable travel options can be improved to/from and through this site. That work includes other landowners/

interests, including those from the Central Winchester Regeneration, Hampshire County Council and bus operators with the intention of promoting a Whole Winchester approach to sustainable travel. That work has not reached a conclusion and until it does, it would be premature to require that the bus station be accommodated on this site, or indeed that it be relocated from Central Winchester Regeneration Area (plan policy W7).

482. **MM74** confirms provision for infrastructure needed to make the development acceptable in planning terms, along with confirmation of the status of listed buildings within the site. Those changes are necessary to ensure that the policy is justified, effective and consistent with national policy.
483. This is a complex, brownfield urban site in multiple ownership. However, feasibility and design work is progressing. No barrier to development within the Plan's housing requirement period is identified.
484. Thirty five dwellings are included within the Council's five year housing land supply on adoption. Given this is a Council owned car park site (Gladstone Road), and there is progress towards the submission of a planning application, clear evidence that housing completions will begin on site within the first five years of the Plan's housing requirement period is demonstrated.
485. Subject to **MM74** this policy is soundly based.

Policy W9 Bar End Depot

486. This is a Council owned site, currently occupied by a range of commercial uses including offices, storage buildings, a disused fuel storage facility and external compound. It is located next to the recently completed Winchester Sport and Leisure Park. It fronts onto one of the radial routes into Winchester Town and is within easy walking distance of the centre. It is proposed to accommodate a mixed use development of 30 dwellings, a local convenience store and specialised facilities including an element of care.
487. A design framework was developed with local communities going back to 2015 setting out a shared vision for a wider area, including this site. The proposed allocation would not conflict with that overall vision, for an area of sport and recreation, leisure wellbeing, enjoyment and complementary facilities.
488. Given the site's proximity to the Winchester Town and its location on a main radial route, the addition of a requirement for a footpath and cycleway link is necessary to promote active forms of travel. **MM75** does this. That is necessary to ensure that the policy is justified, effective and consistent with national policy.
489. Given its proximity to the National Park, the Plan site and wider context diagrams should be amended to indicate this. **MM75** deals with this.

490. Whilst there is not an explicit requirement for cycle and walking routes through the site, that could be managed through the development management process, in accordance with requirements of other Plan policies, including policy D1 (i) and (iii) and T1, which together require good permeability, encourage active travel and the integration of active travel routes into development layouts with connections to the wider network.
491. There is active developer interest and no barrier to development of this site within the Plan's housing requirement period has been identified. Subject to **MM75** it is soundly based.

Policy W10 Former River Park Leisure Centre Site

492. This allocation relates to the River Park Recreation Ground, occupied by the former Riverpark Leisure Centre. That was decommissioned when the new Winchester Sports and Leisure Park opened in 2021. It is situated in a sensitive location in the historic core of Winchester Town, close to a number of heritage assets and the National Park. It is proposed to allocate this land for learning and non-residential institutional uses. That could include uses such as education, museum, exhibition space, indoor sport and recreation.
493. As the previous leisure centre use has been provided elsewhere, the use of this site for purposes other than sport and recreation would accord with the Plan when read as a whole, including policy NE3. In respect of any open space provision, it would need to accord with policy NE10.
494. The land was acquired by the Council's predecessor in a title by indenture in 1902 for the purposes of a public park and recreation ground. That includes the right to erect any other building or galleries for recreation, scientific or other similar purposes ... and any other buildings that may be required for the benefit of the City, except industrial dwellings.
495. The proposed uses would be consistent with the statutory purpose for which the site is currently held. That would include the erection of buildings ancillary to the main use (recreation) on land previously not built on. Therefore, there is no legal impediment that would prohibit the principle of development proposed in this allocation.
496. I am aware that there was a proposal for use of the site by Southampton University. That is now no longer an option. However, in itself that does not indicate that the site will not be delivered within the Plan period.
497. As the site is so close to the National Park, **MM76** adds the boundary of that designation to the Plan site and wider context diagrams. It also amends the reasoned justification to confirm the status of heritage assets both scheduled and listed in and around Hyde Abbey Gardens. It also clarifies requirements in relation to flood risk and sets out the need to phase development occupation

until sewer network capacity is confirmed. Those changes are necessary to ensure that the policy is justified, effective and consistent with national policy.

498. The site is in single public ownership. That should aid development progress. Recent public consultation indicates a willingness to develop the site. No barrier to delivery of this site within the Plan period has been evidenced. Subject to the identified MMs, this allocation is soundly based.

Policy W11 University of Winchester/Royal Hampshire County Hospital

499. This allocation covers land currently occupied by the University of Winchester and the Royal Hampshire Hospital. It provides for the redevelopment, consolidation and expansion of the University and for the retention and improvement of the hospital, with the aspiration of retaining both uses as essential local services and sources of employment.
500. If redevelopment/selective redevelopment is envisaged, the policy requires health related uses, student accommodation and housing, guiding development in this sensitive elevated position through the submission of a masterplan.
501. However, the reasoned justification does not refer to the Winchester Conservation Area Appraisal. Reference to it is essential given its historic setting. This is done by **MM77**, which is necessary in the interest of effectiveness. Subject to **MM77** this allocation is soundly based.

Conclusion

502. Subject to the identified MMs I find that the Plan has been positively prepared and is justified, effective and consistent with national policy in regard to the site allocations in Winchester Town.

Issue 13 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy with regard to the site allocations in South Hampshire Urban Area.

Policy SH1 Newlands (West of Waterlooville)

503. This allocation is in the extant Plan, reallocated in this Plan. It includes the larger part of a mixed use urban extension to the south of the District. It is planned to deliver 3,000 dwellings of which about 600 would be located within Havant Borough, associated employment provision, and supporting facilities and services. The site is partially built out, with about 1,000 (2024/25) yet to be delivered.
504. Additional capacity has been identified without extending the proposed development area, through a mixture of revisions to the estimated capacity of various phases (about 145 dwellings), development of land previously reserved but no longer needed for expansion of the primary school, cemetery and mixed

use areas (approximately 160 dwellings), and the development of an 85 bed older persons' housing scheme (already permitted within the local centre as part of the outline consent for Newlands, (approximately 45 dwelling equivalents). These are expected to give an additional capacity of about 350 dwellings. On the basis of the technical studies carried out, I find these estimates reasonable.

505. The Submission Plan indicated an additional capacity of 300 dwellings. Given the developer's capacity information and associated technical studies I am satisfied that about 350 additional dwellings could be delivered on this site.

MM79 updates the additional capacity details and figures, the current masterplan area map to show the new areas of development more clearly, ensures policy SH1 appropriately refers to the policies map, and amends criterion (v) in relation to off-site improvements, ensuring a requirement to make the development acceptable in planning terms.

506. Policy SH1 is within the Solent Habitats Zone of Influence. In accordance with the HRA an additional criterion is required to ensure that a green infrastructure strategy is implemented to avoid harmful impacts of recreational pressure on European sites. **MM79** does this. Those changes are necessary to ensure that the Plan is justified and effective.

507. However, the current masterplan area map in **MM79** (included as appendix 1) indicates the area within the local centre that would accommodate a care facility. The exact location has yet to be defined. Therefore, I am removing shading indicating the exact location of the care facility and changing the legend on that map from local centre to mixed use including housing, local centre, extra care provision. That is accurate and will ensure that the policy is effective. That change would not significantly change the MM and would not undermine the participatory process.

508. Given that construction is underway and planning permission is in place for much of the development, the inclusion of 600 dwellings in the first five years of the Plan's housing requirement is justified. No barrier to development is evidenced and subject to the MMs identified the policy is soundly based.

Policy SH2 North Whiteley

509. This is a large strategic allocation for approximately 3,500 dwellings plus supporting uses. It is an allocation in the extant Plan, reallocated in this Plan. Roughly 2,500 (April 2023) were yet to be delivered on this site. Additional capacity has now been identified taking account of site constraints. Therefore, the submitted Plan indicates that about 200 additional dwellings could be delivered on this site.

510. Refined capacity work has been undertaken on Land off Bluebell Way which indicates that about 90 additional dwellings could be delivered, which is

reasonable given on-site constraints, including hedgerows and ancient woodland. Additional capacity at the whole site should therefore be reduced accordingly from 200 to 180 dwellings. **MM80** deals with this.

511. **MM80** also clarifies that the extra care scheme providing an additional 40 dwelling equivalents is already permitted as part of the site's outline consent and ensures that policy SH2 appropriately refers to the policies map. Changes require a project level HRA and for the same reason as policy SH1, a green infrastructure strategy is necessary to avoid harmful impacts on European sites. Those changes are necessary to ensure that the policy is justified and effective.
512. Given that there is active developer interest, construction is underway and planning permission is in place for much of the development, the inclusion of 1,425 dwellings in the first five years of the Plan's housing requirement period is justified. No barrier to development is evidenced and subject to the MMs identified the policy is soundly based.

Policy SH3 Whiteley Green

513. This is a Hampshire County Council owned site within a built-up area close to the M27. It accommodates green space and a hard surfaced area.
514. Outline planning permission was granted for a scheme for 75 dwellings. However, part of the site was required for a temporary primary school. A permanent school has been provided within the North Whiteley development. The site is therefore allocated in this Plan for a mixed educational and residential scheme with an estimated capacity of 30 dwellings.
515. Policy SH3, in its reasoned justification provided guidance in relation to wastewater infrastructure that traversed the site. It is now apparent that this is outside the site. The reasoned justification has therefore been amended to require identification of infrastructure adjacent to the site in Cobham Way and Badger Way. That change is included in **MM81**, which is necessary in the interest of effectiveness.
516. Given the scale of development proposed, that the site is publicly owned and outline planning permission exists for 75 dwellings (prior to Hampshire County Council requirement to retain part of the site) the inclusion of 30 dwellings in the first five years of the Plan's housing requirement is justified. No barrier to development is evidenced and subject to the **MM81** identified, the policy is soundly based.

Policy SH4 Solent Business Park

517. This includes part of a large employment site allocated in the extant Plan for a business park, much of which is now built out. As part has yet to be delivered it is appropriate for part of the allocation to be reallocated into this Plan.

518. The policy as submitted confines proposed uses to a range of high technology and business uses falling within Use Class E(g). The policy intention is to ensure that the remaining parcel is delivered in a way which compliments and enhances the existing built part. Restricting proposed uses in the way proposed would be unduly restrictive and fail to meet the policy intent.
519. **MM82** therefore alters the reasoned justification and policy to widen the proposed uses to those complimentary to the business park (within Class E(g)), B2, B8 and other employment uses, which could include a limited amount of appropriate commercial uses. In light of this the requirement for a set amount of employment floorspace is therefore deleted. Those changes are required to support the overall attractiveness of the employment areas for all occupiers and are necessary in the interests of effectiveness.
520. **MM82** also alters the reasoned justification to clarify that the business park has been built out in the main, but there still remains an area of undeveloped land which will be retained for employment uses. That is necessary in the interests of effectiveness.
521. For the same reason, and as this allocation includes land in a prominent location bounded on three sides by the key routes of Parkway and Whiteley Way, requirements for open space and the height of buildings are justified. Those requirements appropriately derive from the built out elements of the business park and given much has been built out, it is important that the layout and design is integrated with the rest of the park, to retain a high quality environment. There is in built flexibility within the policy to ensure adherence to the design led approach.
522. Outline planning permission was granted for this site (19/00852/OUT). That has now lapsed. However, there is active developer interest and therefore there is a reasonable prospect of its development within the Plan period.

Policy SH6 Botley Bypass

523. This allocation safeguards land for the construction of part of the Botley Bypass that falls within the District. The policy as submitted did not protect and ensure access to water supply infrastructure. **MM83** ensures that it does. It also ensures the policy appropriately refers to the policies map. Those changes are necessary to ensure the Plan is effective. Subject to **MM83**, the policy is soundly based.

Conclusion

524. Subject to the identified MMs I find that the Plan has been positively prepared and is justified, effective and consistent with national policy with regard to the site allocations in the South Hampshire Urban Area.

Issue 14 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy with regard to the site allocations in the District's Market Towns and Rural Area

Market Towns

Bishop's Waltham

Policy BW1 The Vineyard/Tangier Lane Newlands (West of Waterlooville)

525. This allocation includes two separate sites either side of Tangiers Lane on the southern edge of the town. Both have now been developed. For that reason **MM86** deletes this policy, and its inclusion within the Plan settlement map showing the Bishop's Waltham site allocations. That is necessary for effectiveness. This deletion will require a consequential change to the policies map.

Policy BW3 Tollgate Sawmill

526. This site allocation is in the extant Plan and reallocated in this one. It is a vacant site previously in a commercial use. It has recently been subject to trespass, and the entrance is now fenced off for safety reasons.

527. The proposed allocation is for employment uses. A small element of housing will be acceptable (about 10 dwellings) if required to bring an employment development forward. It also provides a site to accommodate a GP surgery, if required, justified by evidence of local need.

528. It is confirmed that information is being assembled to support an application to regularise ownership of the site with the Land Registry and establish title [ED40]. Once done, the intention is to begin work on submission of a planning application. Given active interest, there is a reasonable prospect that this site will be delivered with the Plan period. No barrier to development is evidenced.

529. As this allocation is close to the National Park, that boundary should be included in the Plan site and wider context diagrams. That change is necessary to ensure effectiveness. **MM87** does this.

Policy BW4 Land North of Rareridge Lane

530. This site, situated on the edge of the town, is proposed to be allocated for about 100 dwellings. It is currently undeveloped and has been used in the past for growing trees.

531. The site is immediately adjacent to the National Park. The policy effectively deals with site constraints, including the slope of the land, its proximity to the National Park, the sensitive rural setting of the town and the presence of on site trees and planting, through the requirement for a landscape led masterplan.

That should require built development to be sited in the lower southern parts of the site. Together with a conservative site capacity of about 100 dwellings, the policy would enable the effective conservation and enhancement of the landscape and scenic beauty in the National Park. That would include from footpaths in the locality where the site would be seen mainly against the backdrop of the town.

532. Given the density of development in the locality, site size and other identified site constraints, I am satisfied that the quantum of development proposed could be acceptably accommodated on the site along with any biodiversity net gain requirements. No constraint to development within the Plan housing requirement period has been identified.

533. However, given the sensitivities of the site and to ensure effectiveness, the boundary of the National Park should be included on the Plan site and wider context diagrams. In addition, greater flexibility is required to enable the most acceptable measures to support a lower speed environment on Hoe Road. **MM88** deals with these matters. Those changes are necessary to ensure that the policy is effective.

534. No barriers to development of this site within the Plan housing requirement period have been identified. Subject to **MM88**, the proposed site allocation is soundly based.

New Alresford

Policy NA1 The Dean

535. This is an existing allocation reallocated from the extant Local Plan. It includes land on the western side of The Dean, which is intended to be developed having regard to The Dean masterplan. That co-ordinates the various residential commercial and parking requirements of the allocation. Most of the site has already been developed. Development yet to take place includes about 34 dwellings. Therefore, inclusion of this policy in the Plan is justified.

536. The site includes two outstanding planning permissions to deliver the remaining dwellings. They are deliverable and included within the first five years of the Plan's housing requirement period. No barrier to development has been evidenced.

537. **MM90** introduces the requirement for physical and social infrastructure to make the development acceptable. That would include GP services and is necessary to ensure that the policy is effective and justified.

Policy NA2 Sun Lane

538. This is an existing allocation in the extant Local Plan. That allocation includes 10 hectares of residential development (about 325 dwellings), 5 hectares of business, 15 hectares of open space and a burial ground. It is reallocated in this Plan.
539. Planning permission and approval for reserved matters is already in place for development of 302 dwellings. Development is not complete and therefore a policy in this Plan to control development should future applications come forward is justified.
540. However, **MM91** is necessary to ensure that development includes a groundwater risk assessment for the burial ground. That will ensure that the Groundwater Protection Zone is properly protected. In addition, a requirement for physical and social infrastructure is needed to make the development acceptable in planning terms to ensure a well planned development. Those amendments are necessary to ensure that the policy is effective and justified.
541. As planning permission is in place, and development has commenced on site, the inclusion of about 210 dwellings to be delivered in the first five years of the Plan's housing requirement period is justified. Subject to the necessary MMs the policy is soundly based.

Policy NA3 Neighbourhood Plan Designation Area

542. New Alresford Neighbourhood Plan is well advanced. It has identified 6 sites with potential capacity for about 100 dwellings. It is expected that the Neighbourhood Plan will be made later in 2026.
543. However, recognition that the Neighbourhood Plan is not yet made is necessary for effectiveness. This element of uncertainty is dealt with by **MM92**, which introduces the requirement for about 100 homes to be identified in an early review of the Plan, in the event that the Neighbourhood Plan does not successfully go through referendum.
544. **MM92** also encourages the Neighbourhood Planning process to engage with Southern Water early in the process to ensure necessary capacity for waste and water. In addition, as submitted policy NA3 (iii) requires development to have regard to local needs for new homes, jobs and facilities. **MM92** adds the provision of other physical and social infrastructure needed to make development acceptable in planning terms. Subject to these amendments, policy NA3 is soundly based.

Larger Rural Settlements

Colden Common

Policy CC2 Colden Common Farm

545. This is a greenfield site which is proposed to accommodate about 45 dwellings. It has a narrow frontage onto Main Road with an existing access. There are a number of site constraints, including nearby listed buildings (Manor House, its barn and grain store), the open fields to the North, the National Park and the integration of any development with the recently developed Sandfields residential development.

546. The design and layout of any development will be influenced to a great extent by the location of the key access points and extent of integration with the new housing nearby, the need to preserve the setting of nearby listed buildings, the National Park close by and the generally rural character of the locality and open fields nearby. Given the scale of development and identified constraints the approach to require a site plan to establish principles for the disposition of development and screening to the listed buildings is proportionate and justified. Together with other policy requirements, site constraints could be effectively mitigated.

547. Given the character and appearance of the locality and other identified constraints, an upper limit on the amount of development is justified. **MM94** does this. It includes the National Park designation in the Plan site and wider context diagrams. Those changes are necessary to ensure the policy is justified and effective.

548. No barriers to development of this site within the Plan's housing requirement period have been identified. Subject to **MM94**, the policy is soundly based.

Policy CC3 Land at Main Road

549. This greenfield site fronting Main Road is close to the National Park. Taking site constraints into account site capacity is evidenced through a concept masterplan.

550. However, the National Park boundary is not indicated on the Plan site and wider context diagrams. That should be corrected. It will help to ensure the conservation and enhancement of the landscape and scenic beauty of the National Park.

551. **MM95** addresses this, which is necessary to ensure that the policy is justified and effective. No barrier to development of this site has been identified. Subject to **MM95** this policy is soundly based.

552. The allocation of this site does not provide appropriate justification for any other allocation in Colden Common.

Policy CC4 Land adjoining 85 Church Lane

553. This site, fronting Church Lane, includes open green fields with large established trees, hedgerows and planting along its boundaries. There is residential development opposite on the other side of Church Lane. Taking site constraints into account, capacity is evidenced.

554. As submitted the policy requires future access to planned water supply infrastructure. However, evidence confirms that the route of the supply pipeline between Havant Borough and Otterbourne would avoid this site. The requirement in policy and the reasoned justification should therefore be deleted. **MM96** does this. That change is required to ensure the policy is effective and justified.

555. No barrier to development of this site within the Plan's housing requirement period has been identified. Subject to **MM96** the policy is soundly based.

Denmead

Policy DEN1

556. The level of development in Denmead is comparable with other settlements of similar size and level of facilities and accords with the Plan's spatial strategy.

557. Despite a number of problems with progression of the Denmead Neighbourhood Plan update, at hearings it was confirmed that work is advancing, with a pre-submission plan (Regulation 14) expected in May to June 2026. At the time of hearings, it was expected that the Neighbourhood Plan will be made later in 2026.

558. However, recognition that the Neighbourhood Plan is not yet made is necessary for effectiveness, particularly in light of the procedural problems faced by the Neighbourhood Plan update. This element of uncertainty is dealt with by **MM98**, which introduces the requirement for about 100 homes to be identified in an early review of the Plan in the event that the Neighbourhood Plan does not successfully go through a referendum. This provides appropriate certainty should the Neighbourhood Plan not allocate necessary sites.

559. **MM98** also encourages the Neighbourhood Planning process to engage with Southern Water early in the process to ensure provision of any additional capacity for waste and water. In addition, as submitted policy NA3 (iii) requires development to have regard to local needs for new homes, jobs and facilities. **MM98** also adds reference to the provision of physical and social infrastructure

needed to make development acceptable in planning terms. Subject to these amendments, policy NA3 is soundly based.

Kings Worthy

Policy KW2 Land adjoining the Cart and Horses Public House

560. This greenfield site on the edge of Kings Worthy is proposed to be allocated for older persons housing, providing about 75 dwelling equivalents. Given the site's location close to facilities and services an identified housing need for older persons housing [HA01] and a willing developer, the policy approach is justified.
561. There are significant constraints to this site, including the proximity to the National Park, listed buildings, and two conservation areas, its location within the Kings Worthy/Abbots Worthy settlement gap and protected trees. However, evidence is before me to demonstrate that a sensitive development of the scale proposed could be acceptably accommodated on the site.
562. However, given site constraints, to ensure effectiveness the boundary of the National Park should be shown on the Plan site and wider context diagrams. For the same reason, the reasoned justification should make clear the need to avoid harmful impacts on the setting of heritage assets and the National Park. In addition, given that the rearrangement of the Basingstoke Road, London Road and B3047 junction is required to ensure safe access and highway conditions, a criterion to ensure development does not take place prior to those works is necessary. Those changes are necessary to ensure the policy is effective and justified.
563. **MM100** addresses all these points. Subject to the necessary changes identified, this policy would effectively deal with all identified constraints. No barrier to development of this site within the Plan's housing requirement period has been identified. The site allocation is soundly based.

Swanmore

Policy SW1 The Lakes

564. This is an allocation in the extant Local Plan. It includes three parcels of land, much of which has either been developed or is under construction. However, the allocation has not yet been delivered in full and therefore its inclusion in this Plan is justified. It is therefore reallocated in this Plan.
565. **MM102** requires all necessary social and physical infrastructure is delivered, as part of the development. That is necessary to ensure that development is acceptable in planning terms. That change is required for effectiveness. Subject to this amendment, the policy is soundly based.

566. Seventeen dwellings are included in the Council's five year housing land supply calculations. Whilst planning permission is not in place for the remaining dwellings, pre application discussion has taken place. On balance, I consider firm progress towards the submission of an application is before me and inclusion in the Council's five year supply calculation is justified.

Wickham and Knowle

Policy WK1 Winchester Road Housing and Open Space

567. This allocation is an allocation in the extant plan, reallocated in this Plan. It includes two sites on the edge of Wickham allocated for about 125 homes on the Winchester Road site, open space on the other which is just off Mill Lane.

568. The latest monitoring information confirms that the dwellings have now been built out. Requirements are for the provision of sports pitches and associated open space on land within the same ownership at Mill Lane. That requirement meets a local identified need. That element of the development has not yet been delivered and therefore retention of policy WK1 in this Plan is justified.

569. As submitted policy WK1 requires the provision of sports pitches, pavilion and parking to be provided at Mill Lane. However, evidence suggests that the sports provision may not be affordable for the Parish Council. On that basis greater flexibility should be introduced in policy WK1(vii) to enable either public sports facilities and suitable changing facilities or other suitable open space. **MM104**, which includes consequential changes throughout the policy and reasoned justification at policy WK1(i), (ii) paras 14.110 and 14.112 does this.

570. Given the proximity of the National Park to the Mill Lane site in particular, a change to the Plan site and wider context diagrams is necessary to ensure its recognition is also reflected in **MM104**. That MM is necessary to ensure that the policy is effective and justified. No barrier to development of this site in full within the Plan's housing requirement period is identified. Subject to the **MM104**, it is soundly based.

Policy WK3 Welborne Open Space

571. This policy includes land which sits within the Knowle, Wickham and Welbourne settlement gap. That is subject to the protections provided by policy NE7 in relation to settlement gaps.

572. The Welborne Plan policy WEL5 [RP03] includes green buffers which will contribute to the protection of the settlement gap and the sensitive edges of the settlements of Knowle and Wickham nearest the Welborne development (the entrance to Knowle and Ravenswood Hospital and the string of development along Hoad's Hill/Wickham Road). Policy WEL29 sets out the requirement for some green infrastructure to be located within the settlement gap.

573. The genesis of this policy is in extant policy SH4, with a purpose to deliver potential provision of green infrastructure and open space in association with the Welborne Garden Village development, as well as maintain the settlement gap between that development and those settlements nearby including Knowle and Wickham. The Welborne Plan sets out the potential for such uses to be located on part of the settlement gap land at Knowle Triangle (22 hectares) and Dashwood (38 hectares).
574. Whilst the Welborne development is under construction at present and matters could change, there is no evidence before me to suggest that land outside those two parcels would be used in association with the Welborne development. Therefore, given the existing protections for this land under policy NE7 relating to settlement gaps, and the limited areas expected to provide for green infrastructure in association with the Welborne development, **MM105** is necessary to amend the site allocation to include land within the Knowle Triangle and Dashwood only. **MM105** therefore changes the policy wording and reasoned justification to reflect this, along with the Plan site and wider context diagrams. These changes are necessary to ensure that the policy is justified, effective and consistent with national policy.
575. Evidence suggests that some of the land included in this allocation is not available for the purpose intended within this policy and neither is it identified as green infrastructure in the extant planning permission for the Welborne development (Fareham Borough Council Ref 17/02266/OA). However, that development is not fully built out and matters could change. For this reason, the Welborne Plan remains the appropriate basis for identifying land that could be required for green infrastructure.
576. **MM105** will require a consequential change to the policies map.

Policy WK5 Mill Lane

577. This is a greenfield site to the north of Wickham. It is proposed to be allocated for about 40 homes.
578. This site is well related to the facilities and services in the settlement of Wickham. Evidence assures me that a modest development of about 40 dwellings could be acceptably accommodated taking account of its proximity to the National Park, the sensitivity of the landscape to the north and the requirements for screening, landscaping and connections for active forms of travel.
579. Even though Mill Lane has a rural character, given the road, traffic and site conditions, I am satisfied that acceptable access which maintains the rural character of the locality would be achievable. Policy requirements effectively deal with these matters.

580. The site is not highlighted as being at risk of flooding. However, it does accommodate an overland flow route. That would need to be maintained which could be dealt with through an appropriate policy requirement. In addition, as Mill Lane has a history of flooding, any flows during and after construction would need to be appropriately managed to ensure that this is not exacerbated. Again, this could be dealt with through appropriate policy requirements and the development management process.
581. However, given the sensitivity of the site close to the National Park and in wider views, clarity on the reason for landscape buffers is necessary along with inclusion of the boundary of the National Park in the Plan site and wider context diagrams. Requirements to achieve suitable pedestrian links and to retain the surface water overland flow route are overly prescriptive and to ensure effectiveness greater flexibility is necessary.
582. **MM106** corrects all these matters and is necessary to ensure that the policy is justified, effective and consistent with national policy. No barrier to development of this site within the Plan's housing requirement period is identified. Subject to the necessary MM this site allocation is soundly based.

Policy WK6 Land at Southwick Road/School Road

583. This is a greenfield site on the edge of the settlement allocated for about 60 dwellings. Despite the generally rural character of the site and the locality, including existing mature trees and hedgerows, given the site's size, modest proposed capacity, and adjoining development at Grindall Field, the site could be developed for the suggested capacity whilst maintaining the generally rural character of the locality.
584. As the allocation does not extend to Southwick Road its title should be amended to Land at School Road. Given the site's proximity to the National Park, further clarity on the requirement for landscape buffers is necessary along with inclusion of the National Park boundary on the Plan site and wider context diagrams.
585. In addition, a requirement to ensure that development ensures future access to existing sewerage infrastructure is necessary for maintenance and upsizing as required. In addition, further explanation of the requirement for archaeological investigation is necessary, given recent finds on the adjacent Grindall Field development. All those changes are necessary to ensure that the policy is justified, effective and consistent with national policy and are included in **MM107**.
586. Even though a recent planning application was refused for development of this site (24/02803/FUL), that was on the basis that it is a greenfield site. This has subsequently been granted permission on appeal. Subject to **MM107** this site allocation is soundly based.

Wickham Settlement Boundary

587. To ensure a consistent application of the settlement boundary methodology, given my findings on the soundness of site allocations at Wickham, the settlement boundary should be updated to include the site allocations at Winchester Road open space allocation (policy WK1), Mill Lane (policy WK5) and Southwick Road/School Lane (policy WK6). Those have established, visible boundaries that will not change as a consequence of development which justifies this approach. **MM105** does this, which is necessary for effectiveness.

588. The Council should make consequential changes to the policies map.

Knowle

Policy KN1 Ravenswood Knowle

589. This allocation includes open land proposed to yield about 200 homes alongside a considerable amount of open space, nature conservation and agriculture as part of community led development. The site is about 68 hectares of which only 6 hectares would be developed.

590. The proposed allocation would be sited within the Wickham/Knowle settlement gap. The site has a resolution to grant planning permission. On that basis, and given the site size, amount of open space and type and character of development proposed, along with proximity to the hospital site and other built development, I am satisfied that a development of this scale could be accommodated on the site without compromising the character of the settlement gap. Any potential flooding or contamination to the River Meon would be appropriately dealt with through policy NE6.

591. In accordance with the HRA Addendum [HRA01-02, ED20] a requirement for a green infrastructure strategy to avoid harmful impacts and mitigate the local and wider impacts of development, and any necessary off site measures is required to mitigate harmful impacts on European sites. That is not included in the Plan, so **MM109** adds this.

592. In addition, the policy as submitted does not provide a link to the policies map. **MM109** corrects this. It also updates the requirement for a connection to a point of adequate capacity in the sewerage and water supply network to recognise that there is more than one provider. All these changes are necessary to ensure that the policy is justified, effective and consistent with national policy.

593. Subject to the identified MM, the policy requirements would appropriately deal with site constraints. No barriers to development of this site are identified. Given that this development benefits from a resolution to grant planning permission subject to the signing of a legal agreement (18/01612/OUT), and on the basis of the progress evidenced by the public bodies involved (Homes England, the Council and Hampshire County Council), I am satisfied that inclusion in the

Council's five year housing land supply calculations of 150 homes towards the end of that period is justified.

Intermediate Rural Settlements

Hursley

Policy HU1

594. Hursley was upgraded to an Intermediate Rural Settlement during Plan preparation through the consistent application of the settlement hierarchy methodology. Whilst it is recognised that the spatial strategy indicates a housing target for Intermediate Rural Settlements of 50-60 dwellings, given that a Neighbourhood Plan was already in preparation at the time that the settlement grading was changed, along with the constrained nature of the settlement, an approximate figure of 20 dwellings expected to be delivered through the Neighbourhood Plan or through windfall is justified.
595. Although at hearings evidence suggested the Neighbourhood Plan was still at an early stage of preparation and expected to be made later in 2026, recent evidence suggests that may not be the case.
596. It is possible therefore that the Neighbourhood Plan is not made within the Plan's Housing requirement period. Policy HU1 recognises this, indicating that the settlement housing target could be delivered through windfall. However, given the uncertainty introduced through the Neighbourhood Plan process, confirmation that any shortfall will be addressed in an early review of the Plan is necessary. That is dealt with by **MM111**, which is necessary to ensure that the Plan is justified, effective and consistent with national policy.

Otterbourne

Policy OT01 Land East of Main Road

597. This is a greenfield site fronting onto Main Road. The submission Plan allocates it for about 55 dwellings. Given the site size, linear character and nature of development fronting onto Main Road either side, and the character and appearance of development in the locality, taking account of site constraints, I find the proposed site capacity to be reasonable and justified. An indicative framework plan submitted by the site promoter at Reg 19 stage supports this.
598. A geophysical survey undertaken in 2016 has revealed a number of sub-surface anomalies which could relate to previous evidence of a Roman Road or associated roadside remains. A policy requirement to ensure the site's archaeology is appropriately conserved is necessary. **MM113** addresses this in both policy text and reasoned justification. It also updates the Plan site and wider context diagrams to include the boundary of the National Park, given its proximity. All these changes are necessary to ensure that the Plan is justified,

effective and consistent with national policy. No barrier to development within the Plan housing requirement period is evidenced. Subject to the necessary MM this site allocation is soundly based.

South Wonston

Policy SW01 Land at West Hill Road North

599. This is a greenfield site to the north of the settlement. It is proposed for allocation accommodating about 40 dwellings. Any development of this site would need to accord with the Plan when read as a whole and have due regard to any Village Design Statement.

600. Policy requirements would deal appropriately with the range of site constraints, including the surrounding visually open and expansive arable landscape, local views, highway safety issues on Alresford Drove, provision of pedestrian footpaths and the presence of an aquifer. However, **MM115** is necessary to ensure physical and social infrastructure needed to make development acceptable in planning terms. That change is necessary to ensure that the Plan is effective. No barrier to development within the Plan housing requirement period is evidenced. Subject to the necessary MM this site allocation is soundly based.

Sutton Scotney

Policy SU01 Land at Brightlands

601. This site is a greenfield site on the edge of Sutton Scotney. The submitted Plan allocates it for about 50-60 dwellings. It is located outside the settlement boundary. In accordance with a consistent application of the settlement boundary methodology, it is proposed to be included in the settlement boundary, requiring an associated change to the policies map.

602. The suggested capacity, given the site size, identified constraints and the character and appearance of the locality appears reasonable and justified. In any event, if further design development indicates a greater/less capacity, the wording of the indicative number of dwellings provides some flexibility.

603. The site is not classified as best and most versatile agricultural land, so protection of such land is not an issue in this case.

604. Although the A30 road is busy and divides the site from the main settlement, interventions to enable pedestrian crossing, having regard to the semi-rural character of the locality would be achievable. That would enable access to facilities and services within the settlement of Sutton Scotney for prospective residents, helping development of the site to properly integrate with the main settlement.

605. Vehicle access could be taken from the existing roundabout to minimise impact and cycling and pedestrian routes could enhance sustainable travel options. Whilst additional traffic onto the main A30 road would be a consequence of development, there is no substantive evidence that there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. No objection from the Highway Authority on highway safety grounds is before me.
606. The development would require a noise assessment to ensure mitigation to prevent excessive disturbance to the residential dwellings proposed. I have no substantive evidence that mitigation would not be possible.
607. No substantive evidence of abnormal costs associated with development of this site is before me. That includes the provision of necessary highway infrastructure and any noise mitigation measures.
608. The site is a low flood risk, as indicated by Environment Agency mapping, including fluvial and surface water mapping, taking account of historic data and flooding. However, a site specific flood risk assessment and drainage strategy would need to be prepared and implemented to deal with any flood risk if identified. In addition, a hydrogeological risk assessment is required to ascertain ground water conditions and levels and any impacts that would need to be mitigated. Proposed site capacity indicates that layout and detailed design can enable the existing overland flow path route to continue.
609. Capacity of mains drainage at Sutton Scotney has been a significant issue in the past. Southern Water is currently delivering a project to upgrade their wastewater treatment sites located at Saddlers Close & Gratton Close. In addition, upgrades to the receiving sewer network in the Harestock sewer catchment will be delivered as a business priority early in the next water industry Financial Plan period of 2025-2030. These schemes, once completed, will be sufficient to allow the sewer catchments serving Sutton Scotney to meet the growth needs projected in the Plan and any new drainage connections from existing properties. This is confirmed in the Southern Water SoCG [SD08k and ED27, ED27a]. Policy requirements recognise this and phase occupation of the site to align with these waste water infrastructure upgrades.
610. Whilst this site may not have been that favoured by the Parish Council or many in the local community, its selection represents a consistent application of the Council's site selection methodology. On that basis, and given my previous findings, even though there may be locally preferred sites, it is justified.
611. However, some amendments to the policy and reasoned justification are necessary. At present the reasoned justification regarding waste water infrastructure is incorrect. Clarification of the exact upgrade works required, including at Sutton Scotney, South Wonston and Harestock, is necessary along

with a requirement for the Council to encourage and support new and improved sewerage infrastructure.

612. Clarification of the need for a hydrogeological risk assessment is required for clarity, along with an explanation of the archaeological potential of the site and its conservation. **MM117** addresses all these matters and adds the need for a contribution to physical and social infrastructure needed to make the development acceptable in planning terms. All of these changes are necessary to ensure that the policy is justified, effective and consistent with national policy.
613. Subject to **MM117** the policy would effectively deal with all constraints. No barrier to development is identified and confidence is provided that the site development can be delivered within the Plan housing requirement period. Subject to the necessary MM this site allocation is soundly based.

Waltham Chase

Policy WC1 Morgans Yard

614. This is an allocation in the extant Local Plan. It is reallocated in this Plan. It is a brownfield site with a number of employment uses and showrooms in a loose form of development that does not make the most efficient use of the site. It is proposed to be developed to replace some of the employment uses on the site, having regard to viability, alongside about 80 dwellings.
615. **MM119** includes a requirement for the provision of physical and social infrastructure to make development acceptable in planning terms. That is necessary to ensure that the Plan is effective.
616. An extant planning permission is in place (21/02439/FUL). Reserved matters applications have been submitted. No barrier to development within the Plan housing requirement period is before me. Given an extant permission and active developer interest, inclusion of 79 dwellings in the first five years of the Plan's housing requirement period is justified. Subject to **MM119**, the allocation is soundly based.

Conclusion

617. Subject to the MMs identified, the Plan has been positively prepared, is justified, effective and consistent with national policy with regard to the site allocations in the District's Market Towns and Rural Area.

Issue 15 Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to its approach to infrastructure provision, viability and monitoring.

Infrastructure

618. The Plan is supported and informed by a draft Infrastructure Delivery Plan (2024) [IN01]. Its aim is to aid the delivery and timing of infrastructure provision to enable sustainable communities supported by appropriate facilities and services.
619. The Infrastructure Delivery Plan provides details of the key infrastructure requirements identified in the Plan, providing indicative costs, timescales, priority, and funding source/delivery, focussing primarily on strategic matters that underpin delivery of the Plan. It also sets out infrastructure requirements to support site allocations.
620. Given the challenges of projecting long term funding sources, the Infrastructure Delivery Plan will be updated regularly in accordance with the most up to date evidence. It is intended that an update will be published either as part of the AMR or in conjunction with the Council's Infrastructure Funding Statement.
621. Strategic policy SP2(x) requires an applicant to undertake an assessment of infrastructure needs and site allocation policies include site specific criteria to ensure infrastructure provision. Those requirements together with the Infrastructure Delivery Plan and other evidence base, will help to ensure that the required infrastructure to meet the Plan's development needs has been identified and appropriately planned for.
622. Overall, I consider the Plan's approach to the provision and timely delivery of infrastructure required to support the Plan accords with NPPF paragraph 20. In addition, in engaging with infrastructure providers, it would further the aims of NPPF paragraphs 16c, 25 and 26. Also, the methodology adopted aligns with the PPG. It has been viability tested and appropriately informed Plan requirements.

Viability

623. The Local Plan Viability Assessment July 2024 [LPV01-18] accords with the PPG, using industry established methodologies applied in a consistent way. Generally it employs well established principles and a proven approach.
624. It is a comprehensive study involving an iterative process including a two way dialogue between the Council and consultants to both inform and test Plan policy. It included consultation with stakeholders, including the development industry. It makes reasonable assumptions based on adequate, up to date and proportionate evidence regarding meeting policy requirements and national standards along with reasonable infrastructure delivery and other development costs. Overall, I am content that it is proportionate and robust.

625. The Local Plan Viability Study Report [LPV01] and Local Plan Viability Report-Further Information [LPV04] conclude that the Plan strategy and policies are viable and do not undermine the deliverability of the Plan.

626. It also confirms that the application of the Plan's affordable housing requirements would not put Plan provision at viability risk. Recommended policy changes have been reflected in the Plan's requirements to ensure viability, particularly in relation to affordable housing quantum and mix requirements and housing typologies.

Monitoring

627. The Plan includes a detailed monitoring framework that sets out the key monitoring indicators and data sources which will be measured through the annual monitoring report.

628. Together, they will enable assessment as to whether the policies are being delivered. They therefore represent a proportionate and justified approach.

Conclusion

629. I conclude therefore that the Plan's approach to infrastructure, viability and monitoring has been positively prepared, is justified, effective and consistent with national policy.

Other Necessary Changes

630. Plan appendix II sets out extant and proposed policies alongside their numbers. As submitted this omits all Plan site allocations. **MM120** lists Plan site allocations alongside extant and Plan numbers for inclusion in appendix II.

631. **MM121** includes in the Plan glossary a number of terms that are referred to in the body of the Plan.

632. Those changes are necessary in the interest of effectiveness.

Overall Conclusion and Recommendation

633. The Plan has deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

634. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the Duty to Co-operate has been met and that with the recommended MMs set out in the Appendix, Winchester District Local Plan Proposed Submission Local Plan (Regulation 19) 2020-2040 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

R Barrett

Inspector

This report is accompanied by an Appendix containing the MMs