# Winchester District Local Plan Part 2: Development Management and Site Allocations

### **Soundness Self-Assessment**

March 2016



This soundness compliance self assessment checklist is based on the Local Plan Self-Assessment Toolkit produced by the Planning Advisory Service (PAS) in March 2014. Winchester City Council has used this checklist to demonstrate that the Winchester District Local Plan Part 2 (Development Management and Allocations) meets the tests of soundness as set out in the relevant legislation. The PAS toolkit template has been edited as necessary to reflect local circumstances.

#### Introduction to PAS Toolkit.

This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

#### In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

#### The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is 'sound' ", namely that it is:

#### 1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

## **2.** Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

#### 3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

#### 4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see <a href="https://www.pas.gov.uk">www.pas.gov.uk</a>) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

#### **Soundness Test and Key Requirements**

#### **Evidence Provided**

**Positively Prepared:** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Vision and Objectives

Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?

Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?

Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?

Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?

Are the policies internally consistent?

Are there realistic timescales related to the objectives?

Does the DPD explain how its key policy objectives will be achieved?

The Winchester Local Plan comprises two main elements: The Local Plan Part 1 (joint Core Strategy) March 2013 and the Local Plan Part 2 LPP2 (Development Management and Allocations) which is the subject of this submission and examination.

Other DPDs which will form part of the Development Plan are the Denmead Neighbourhood Plan (2015) and the forthcoming Gypsy and Traveller Site Allocations DPD (for adoption in 2018)

The vision and objectives for Winchester District are set out in LPP1 at Section 2. The LPP1 describes the development strategy for the Winchester District and includes allocations for strategic development together with a series of core policies. Section 1 of LPP2 explains how Part 2 seeks to help deliver the LPP1 strategy and the vision, objectives and strategic policies set out therein.

LPP2 Development Management and Allocations, continues with the strategy of LPP1, allocating smaller sites to sit alongside the larger strategic sites allocated in LPP1.

LPP2 also contains a series of development management policies that provide more detailed guidance in dealing with applications for development in line with the strategic polices set in LPP1.

A key matter not included in LPP2, although strategic guidance is set out in LPP1 (Policy CP5), is the allocation of sites for gypsies and travellers. This is to be the subject of a separate DPD as identified in the 2015 LDS.

The Plan is positively prepared as the strategy set out in LPP1 outlines the quantity of growth to meet identified OAN, covering the plan period of 2011 – 2031 and LPP2 takes forward the process of allocating sites to fulfil the OAN.

The process of preparing LPP1 included an assessment of reasonable alternatives in terms of the development strategy and quantum of development to be allocated in LPP1 through the strategic allocations. This

Soundness Test and Key Requirements	Evidence Provided
	has been found to be sound and NPPF compliant and was adopted in 2013.
	For LPP2 the City Council worked with local Parish Councils to consider reasonable alternatives in terms of the location of sites to fulfil the development needs determined in LPP1. The consultation on the Draft Plan provided opportunities for submissions of alternatives, which the City Council has taken into account when preparing this submission plan. The Consultation Statements (Reg 18 and Reg 19 provide more information on this process).
	Delivery of the planning strategy via site allocations and the implementation of policies is considered in Section 7 of LPP2 'Infrastructure, Implementation and Monitoring'. This is founded on an <u>Infrastructure Delivery Plan (IDP)</u> and the Monitoring Framework at Appendix D of LPP2, assessed yearly in the Council 's <u>Annual Monitoring Reports (AMR)</u> .
	A <u>Local Development Scheme (LDS)</u> showing the timetable for the production of the DPDs – including that for Gypsy and Traveller Sites - has been prepared and has been kept up-to-date. The LDS details the scope and content of planned DPDs
The presumption in favour of sustainable development (NPPF paras 6-17)	See above
Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.	The development needs of the plan area were established in the background work to LPP1 and included a SHMA, SHLAA, Housing Needs Assessment and Employment Land Review evidence base
Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:	The development strategy for the District included the identification of the
—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or	most sustainable locations as places for growth – these are set out in Policy DS1, WT1, SH1 and MTRA1 of LPP1. These policies refer to 'about' a quantum of development providing flexibility.
—specific policies in this Framework indicate development should be restricted.	Opportunities for sustainable development in different areas of the District are expressed in the different approaches to development set out in LPP1 in Winchester Town, the South Hampshire Urban Areas, the Market Towns

Soundness Test and Key Requirements	Evidence Provided
	(MTRA 1 & MTRA2) smaller settlements (MTRA3) and the wider rural area (MTRA4)
	The justification for the preferred overall strategy undertaken and the distribution of development forms part of the background to LPP1.
	LPP2 identifies where the quantum of development expressed in Policies MTRA1 and 2 of LPP1, will be delivered, in terms of site allocations and policies.
	The process leading to the decisions taken on the allocations in LPP2 is shown in the <u>Technical Assessments for Settlements</u> where the City Council worked with local parishes assessing sites in technical terms and undertaking <u>community engagement</u> on potential sites.
	The local community led the process of determining the specific development needs of settlements identified for growth in LPP1 (mainly through Policy MTRA2 of LPP1) and the preferred locations for site allocations. This process is detailed in the Consultation Statement (Reg 18)
Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable	Policy DS1 of LPP1, expresses in broad terms that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.
development, with clear policies that will guide how the presumption should be applied locally.	LPP2 follows the spirit of DS1 through the various site allocation policies which promote proportionate levels of growth to sustainable locations.
	Policies clearly indicate where particular interpretations apply, such as outside settlement boundaries (MTRA4 of LPP1 and DM1 of LPP2)
Objectively assessed needs  The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.	The development strategy and corresponding targets were set in LPP1. The Council has an extensive <u>evidence base</u> on topics such as the SHLAA and Employment Land Reviews which were used to determine the strategy and targets

Soundness Test and Key Requirements	Evidence Provided
Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	LPP2 allocates non strategic sites in accordance with the strategy in LPP1.
	<u>Technical Assessments</u> were undertaken for the settlements with allocations in LPP2 and include matters such as population and employment projections and community needs and form part of the evidence for LPP2.
	A Consultation statement was published at Regulation 18 stage <u>Consultation</u> <u>Statement Draft Plan 2014</u>
	and updated with publication of LPP2 at Regulation 19 Consultation Statement 2015
	In addition a Duty to Cooperate statement was prepared and published under Regulation 18 and 19.
	Duty to Cooperate Statement Part 1 2014
	Duty to Cooperate Statement Part 2 2015
	Duty to Cooperate Statement (Submission)
	The Duty to Cooperate Statement illustrates how cross-boundary issues – including the accommodation of OAN -have been considered.
NPPF Principles: Delivering sustainable development	
1. Building a strong, competitive economy (paras 18-22)	
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	The economic vision and strategy is set in LPP1 – Policies DS1; WT1; SH1 and MTRA1; MTRA2. Specific policies in LPP1 also cover economic growth and diversification (Policies CP8 and CP9).
	LPP2 builds on the above strategic guidance and includes a range of policies that promote economic growth and diversification as part of mixed use or employment allocations at:-
	Winchester Town: WIN1, WIN2, WIN4, WIN5, WIN6, WIN7, WIN11.

Soundness Test and Key Requirements	Evidence Provided
	WIN 11 in particular allows for a variety of approaches across the Winnall area of Winchester Town to better accommodate the various needs of different forms of businesses.
	Market Towns and Rural Area: BW5, NA2, NA3, WC1
	South Hampshire Urban Areas : SHUA2, SHUA3, SHUA4
	LPP2 also includes Development Management polices that build on the core economic policies in LPP1 policies with policies aimed at supporting particular aspects of the economy: -
	Retail and Town Centres: DM6, DM7, DM8
	Rural Economy: DM9, DM10, DM11, DM12.
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	LPP1 includes Policy CP21 which sets out infrastructure requirements and the approach to be followed in assessing development impacts.
	LPP2 includes reference to specific elements of infrastructure that will be required as part of the development proposed where necessary. Each site allocation policy specifies access requirements; environmental considerations and where contributions to infrastructure provision will be expected.
	LPP2 also includes reference to where there are known infrastructure deficits such as the drainage system in Wickham which is covered by Policy WK1.
	An up-to-date <u>Infrastructure Delivery Plan</u> has been prepared specifically to address the infrastructure necessary for the delivery of LPP2.
	The evidence pages of the Council's website include a specific infrastructure section which includes all related studies/reports: <a href="Infrastructure Evidence">Infrastructure Evidence</a> <a href="Base">Base</a>
	An Employment Land Review was undertaken during the preparation of LPP1. A study of employment sites is currently being undertaken jointly with three other Hampshire authorities to analyse the quality of existing employment sites in relation to business requirements. The study should be available for the Examination Hearing if it would assist in the consideration of particular

Soundness Test and Key Requirements	Evidence Provided
	sites.
	Policies in LPP2 which involve mixed use development have been subject to viability testing to ensure that they are deliverable, where the viability reports have highlighted potential issues then policies have been reassessed and amended as necessary.
2. Ensuring the vitality of town centres (paras 23-37)	
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)	The Council has an extensive evidence base covering <u>retail matters</u> and Retail Studies and updates have been produced in 2007, 2010, 2012 and 2014.
centres over the plan period (23)	The retail hierarchy is set in LPP1 under Policy DS1 which establishes a 'town centres first' approach.
	The Silver Hill site in Winchester Town (WT1 of LPP1 & WIN4 of LPP2) was allocated to meet the majority of the identified need and retailing is encouraged as part of other town centre developments eg Whiteley, The policy for management and growth of the other town centres is set in MTRA2, which promotes developments within the larger settlements to support their service role and function and position in the retail hierarchy.
	In LPP2 a number of policies refer to a mix of uses in recognition that town centre locations can offer wider benefits if they is a more diverse mix of uses WIN4, WIN 5 – 7 etc. WIN11 takes a pragmatic approach to an area of Winchester that has experienced change to allow for a flexible interpretation of employment generating uses in specified locations.
	LPP2 contains Development Management policies DM6 – DM8 that encourage a suitable mix of town centre uses to positively promote competitive town centre environments:
	DM6 encourages a range of town centre uses within identified centres and sets out the approach for considering town centre uses outside of these areas. DM7 promotes primary shopping frontages as the main focus for retail development. DM8 promotes a greater range of complementary retailing and town centre uses in the secondary shopping frontage. DM9 allows for

Soundness Test and Key Requirements	Evidence Provided
	essential facilities and services that serve local communities in rural areas.
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	See above and Background Paper 3: Silver Hill.
3. Supporting a prosperous rural economy (para 28)	
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	LPP1 Policy MTRA1 acknowledges the need to retain existing employment land and to retain rural shops and facilities in the rural settlements. Policy CP6 seeks to protect and retain local services and facilities ranging from community centres/village halls to local pubs and shops.
	LPP1 policies CP8 and 9 cover economic growth and diversification with land based industries, tourism and recreation being identified as some of the key economic sectors operating in the District. Policy MTRA4 allows for expansion of existing rural businesses, conversions and small scale tourism developments.
	LPP2 includes further policies supporting particular forms of economic development in rural areas:
	The site allocations in the larger settlements provide for economic growth as appropriate. DM9 supports the development essential facilities and services in rural areas to serve local communities. DM10 allows for housing to support agricultural workers. DM11 supports equestrian developments and DM12 allows for leisure and recreation development that require a countryside location.
4. Promoting sustainable transport (paras 29-41)	
Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)  Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and	LPP1 Policy DS1 sets out the main principles for development in the District, prioritising the use of land in existing settlements and accessible locations and seeking sustainable transport modes in new developments. CP10 sets out in broad terms a positive transport strategy for the District. Likewise the development strategy focuses on promoting growth to the most sustainable

#### **Soundness Test and Key Requirements**

opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)

Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)

Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)

Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)

Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)

Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)

Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)

For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)

The setting of car parking standards including provision for town centres. (39-40)

Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)

#### **Evidence Provided**

locations and the allocation policies include references to transport provision including cycle and pedestrian routes. The strategic allocation at Barton Farm, Winchester - Policy WT2 includes provision of a park and ride site.

In LPP2, polices WIN1 and WIN2 set out key principles for development within Winchester Town including the encouragement of sustainable transport options, reduction of carbon emissions and the mitigation of transport impacts.

Additional work was undertaken in the form of transport studies for <u>New Alresford</u> and the <u>B2177, B3354 & A334 Corridor</u> in order to assess the assess any possible cumulative impacts of development proposed by LPP2 in these areas. Transport assessments were carried out to inform the site allocations of LPP2, as part of the technical assessments.

All the LPP2 site allocations include requirements for suitable and safe vehicular, pedestrian and cycle access. Most sites also seek cycle/pedestrian links into surrounding areas/routes.

Some site allocations in LPP2 seek specific transport-related measures: - BW1, BW2, NA2 (public car park), NA3 WK2 and WK3. The allocations in Bishops Waltham (BW2 – BW5) seek the creation of a pedestrian cycle link between both the sites and key areas of public open space along the southern edge of Bishops Waltham to provide a safe and non-vehicular route to the town centre.

Development management policies DM15 and DM17 seek connectivity and permeability. The policies refer to the Council's walking and cycling strategies and require consideration of the needs of pedestrians and cyclists in relation to new developments. DM17 refers to the Council's parking standards and how they will be interpreted flexibly with regard to the circumstances of the development.

An additional policy has been included in LPP2 to safeguard the route of Botley Bypass (Policy SHUA5), which passes through the Winchester District in recognition that this route is likely to be required to deliver planned growth in Eastleigh Borough, as part of working co-operatively with the adjoining

Soundness Test and Key Requirements	Evidence Provided
	authority and the highway authority (HCC)
5. Supporting high quality communications infrastructure (paras 42-46)	
Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)  Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)	LPP1 Policy CP21 refers in general terms to infrastructure provision including telecommunications. LPP2 Policy DM21 provides more detailed guidance as to the acceptable locations for telecoms equipment.  LPP2 policy DM16 seeks high speed broadband provision in association with new developments. Broadband provision is an issue in the District and there are various projects implementing improved provision across the County which are referred to in the supporting text to DM16.
6. Delivering a wide choice of high quality housing (paras 47-55)	
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	LPP1 established the OAN housing requirement for the District up to 2031.  The Council has an extensive evidence base and updates the SHLAA regularly. Supply and delivery is monitored in the Annual Monitoring Report (AMR).,  In LPP1 Policies CP2 and CP3 establish the housing priorities and the need for affordable housing provision. The site allocation policies in both LPP1 and LPP2 refer to 'about' to provide flexibility in delivery.  Background Paper 1: Housing Requirements and Supply sets out in detail how land availability will be maintained. This includes a rolling land availability assessment.

Soundness Test and Key Requirements	Evidence Provided
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	See Background Paper 1, Section 5.
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	See Background Paper 1, Section 5  The Annual Monitoring Report updates the LLP1 housing trajectory and details the five year land supply, including the delivery of strategic sites and monitoring of completions and permissions  The SHLAA is updated regularly, the most recent update being November 2015. This information feeds into the AMR.
Set out the authority's approach to housing density to reflect local circumstances (47).	LPP1 Policy CP14 refers to the effective use of land and refers to supporting higher densities which have good access to facilities and public transport.  LPP2 policies DM14 – local distinctiveness; DM15 – site design criteria; DM16 site development principles – refer to the need to reflect local circumstances and to provide a local response.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	The strategy for housing provision and mix is contained within LPP1, underpinned by an extensive evidence base on housing matters, such as SHMA and SHLAA, providing for the OAN.  LPP1 Policy DS1 refers to social inclusivity. LPP1Policy CP2 seeks new residential development that meets a range of community housing needs and delivers a wide choice of homes. A mix of dwelling types, tenure and sizes is sought. Developments should provide specialist forms of accommodation such as extra care for older persons and homes for those with disabilities.  This policy also refers to the need to provide a mix of dwelling sizes with a priority towards 2 and 3 bed dwellings. Policy CP3 requires affordable housing provision on all sites and includes reference to viability.  As part of the preparation of LPP2, studies have been undertaken in relation to the need for Specialist Housing for Older Persons and the need for access and space standards in new homes.

Soundness Test and Key Requirements	Evidence Provided
	As a result of this LPP2 policy DM2 seeks accessibility and wheelchair access in relation to new developments for affordable housing. Additionally, DM2 seeks minimum space standards for all developments and full compliance with the national space standards for affordable housing.
	LPP1 CP2 seeks a range of housing and encourages a variety of means of provision. The policy is therefore inclusive. The Specialist Housing for Older People study did not consider a need for a specific policy for older persons accommodation. The Council is preparing a Self-Build Register, which will assist in identifying the need for sites for future provision from April 2016.
In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).  In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.	LPP1 promotes development around those settlements which support a wider rural area. The strategy is set out in MTRA1 (Development Strategy Market Towns and Rural Area) and the settlements promoted for sustainable growth are listed in MTRA2 (Market Towns and Larger Villages).
	The Council worked with local communities to assess the development needs in the larger rural settlements as detailed in the Consultation Statements. The Denmead Neighbourhood Plan was prepared by the local community to plan for detailed development needs in that area.
	LPP1 policy MTRA3 (Other Settlements in the Market Towns and Rural Area) promotes development within named settlements to enhance or maintain the vitality of these rural communities. The policy also allows for the local community to support other development proposals to reinforce the settlement's role and function.
	Policy CP4 in LPP1 allows for some market housing to facilitate the provision of affordable housing on rural exception sites to meet local needs.
	LPP2 implements the development required to fulfil the growth needs identified in LPP1 MTRA2 by allocating sites in the settlements listed in that parent policy.
7. Requiring good design (paras 56-68)	

Soundness Test and Key Requirements	Evidence Provided
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	LPP1 includes general design principles in CP13 and CP14 sets out a character-driven approach to density.
	LPP2 includes a number of more detailed policies in relation to design that reflect the principles of the NPPF:-
	DM14 – (local distinctiveness); responding to local character including key characteristics identified in adopted design statements
	DM15 – (site design criteria); Detailed criteria, includes links to public realm, and permeability, as well as appropriate use of materials and landscaping
	DM16 – (site development principles); seeks a safe and secure environment and adequate provision of amenity space, servicing and impacts on neighbours
	Other main policies in LPP2 that cover design principles include –
	DM17 (Access and Parking), consideration of the design and layout of parking provision
	DM13 (Masterplans) encourages the comprehensive planning of larger landholdings
	M22 (Rural Character) refers to the particular visual, physical and tranquillity aspects of rural areas.
	LPP2 also contains a whole suite of heritage policies for the special consideration of historic assets and conservation areas and protected landscapes.
	The Council has also recently adopted the <u>High Quality Spaces SPD</u> which sets out detailed principles for site and building planning and design.
8. Promoting healthy communities (paras 69-77)	
Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and	LPP1 – Policy DS1 refers to social inclusion and CP13 refers to high quality

Soundness Test and Key Requirements	Evidence Provided
accessible environments; and are accessible developments (69).	design including references to public realm.
	LPP2 includes a number of policies that promote a mix of uses particularly in Winchester Town where there are some larger sites with development/redevelopment potential, eg WIN4 – WIN8 also BW5, NA2. Many of the large site allocations in LPP2 provide for a mix of housing, open space and community facilities.
	DM15 encourages permeability, access throughout the site and improved connections within the public realm.
	DM16 requires a safe and secure environment accessible to all.
	DM17 seeks safe and attractive pedestrian and cycling routes.
Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).	LPP1 Policies CP6 and CP7 provide for the retention of existing open spaces and services/facilities. The LPP1 development strategy promotes development in sustainable locations.
	LPP2 - site allocation policies refer to the need to provide open space; pedestrian/cycle routes etc, plus contributions towards education provision.
Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).	Open space needs assessment and a built facilities assessment were carried out as part of the preparation of the LPP1 and form part of the evidence base. LPP1 sets out the general presumption against the loss of open spaces and a series of locally derived standards at CP7
	The site allocations in LPP2 seek to address shortfalls in open space.
	LPP2 - DM4 sets out the detail for protecting identified open areas and sets out the Council's approach to considering development proposals in relation to such areas.
	LPP2 - DM5 sets out the approach for securing open space in relation to new developments. The supporting text highlights the need to improve access to nearby opens spaces and countryside.
	LPP1 policy CP15 supports the protection of GI networks, including rights of

Soundness Test and Key Requirements	Evidence Provided
	way.
Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).	No need for local green space was identified through the community-led assessment of development needs in the identified settlements, nor via the consultation on the Draft LPP2.
	Para 6.2.23 of LPP2 acknowledges that the plan does not seek to identify local green spaces, but seeks to protect important open areas through LPP2 Policy DM4 and CP7 and CP15 of LPP1.
9. Protecting Green Belt land (paras 79-92)	n/a
Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)  Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)  When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)  Boundaries should be set using 'physical features likely to be permanent'	n/a
amongst other things (85)  10. Meeting the challenge of climate change, flooding and coastal	
change (paras 93-108)	
Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)	Most of these issues have already been dealt with in LPP1.  The development strategy for the District set out in DS1 of LPP1 seeks to locate development in the most sustainable locations that reduce the need for travel.

Soundness Test and Key Requirements	Evidence Provided
	LPP1 Policy CP11 seeks energy efficiency and water use standards requirements for new developments, which are being applied in accordance with current Government zero carbon buildings policy.
	LPP1 Policy CP12 supports renewable energy developments subject to criteria.
	LPP1 Policy CP13 (High Quality Design) encourages measures to minimise carbon emissions and promote renewable energy as part of designs.
	LPP1 Policy CP15 protects the identified green infrastructure network and supports new GI provision.
	LPP1 Policy CP17 deals with flooding, flood risk, water quality, drainage, sewage and water supply.
	In LPP2, Policy DM15 specifically supports proposals for energy efficient design, subject to any adverse impacts on local character.
Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy,	See above and LPP1 Policy CP12
and identification of key energy sources. (97)	A renewable energy study was undertaken prior to LPP1 and can be viewed as part of the evidence base. This did not identify any particularly suitable areas for the development of renewable energy/low carbon energy sources.
Minimise vulnerability to climate change and manage the risk of flooding (99)	LPP1 Policy CP17 covers flooding and flood risk matters. An SFRA was conducted for LPP1.
	Flood risk and water issues, including drainage and groundwater, formed part of the technical assessment of potential development locations and sites for LPP2 (evidence base for settlements refers). Statutory agencies and utility suppliers were consulted on sites and their advice taken into account.
	The site allocation polices in LPP2 make explicit reference to water issues such as connection to sewage systems and groundwater protection where it is of particular concern to that location; WIN4,BW4, BW5, CC1, CC2, KW1,NA2,NA3, SW1, WC1,WC3, WC4, WK2 & WK3.
	Site allocations have been made on land in flood zone 1. In Wickham where

Soundness Test and Key Requirements	Evidence Provided
	there are known drainage and consequently flooding matters which are specifically referred to in Policy WK1 which requires a proper assessment of foul and surface water capacity through a multi-agency approach to put into place mitigation measures in advance of development.
Take account of marine planning (105)	The local MMO was consulted on LPP2 as part of the Duty to Cooperate. They considered there were no implications for the Marine Planning Area arising.  The Duty to Cooperate Statement provides more information on this:
	Duty to Cooperate Part 1 (Draft Plan 2014)
	Duty to Cooperate Part 2 (Publication 2015)
	Duty to Cooperate Part 3 (Submission Update)
Manage risk from coastal change (106)	n/a
11. Conserving and enhancing the natural environment (paras 109-125)	
Protect valued landscapes (109)	The strategy and main policies for the natural environment are located in LPP1 at CP15 (Green Infrastructure) CP16 (Biodiversity) CP17 (Flooding) CP18 (Settlement Gaps) CP19 (South Downs National Park) and CP20 (Heritage and Landscape Character)
	LPP2 adds more detail to these policies in Policies DM14 local distinctiveness, DM15 site design criteria, DM22 rural character, DM23 special trees, important hedgerows and ancient woodlands.
	Assessments of landscape quality and potential impacts of development form part of the evidence base for the technical assessments of potential sites for allocation in LPP2 (Technical Assessments for Settlements)
	LPP" does not cover the SDNP which will be subject to the SDNP Local Plan.
Prevent unacceptable risks from pollution and land instability (109)	Contamination issues have been taken into account as part of the site

Evidence Provided
assessments for the allocations in LPP2. These matters are referred to as necessary (eg NA2, WC1).
LPP2 includes a number of development management policies that cover these matters such as DM16 site development principles, DM18 development and pollution, DM19 development and noise and DM20 contaminated land. These policies cover impacts on the environment and human health.
LPP1 Policy CP16 Biodiversity also includes reference to sites of geological importance and refers in general terms to delivering a net gain in biodiversity through supporting development which will maintain, protect and enhance biodiversity.
LPP2 includes various references to biodiversity in the site allocation policies. Some proposals require specific measures such as links into/protection of SINCS and other areas of nature importance and the creation/enhancement of green infrastructure and preservation/planting of landscape barriers, trees and hedgerows. BW1 – BW5, CC1, CC2, KW1, SW1, SW2, WC1, WC4, WK2 & WK3 have particular provisions in respect of these matters.
LPP2 development management policies refer to the preservation and enhancement of biodiversity: - DM14 (Local Distinctiveness) DM16 (Site Development Principles) DM18 (Development and Pollution) Dm20 (Contaminated Land) DM22 (Rural Character) and DM23 (Special Trees, Important Hedgerows and Ancient Woodlands) specifically apply.
LPP1 Policy CP20 covers heritage and landscape character at a strategic level, whereas Policies in LPP2 namely DM24 – DM31 provide detailed guidance on a range of historic matters: -  DM24 (Historic Parks and Gardens)

Soundness Test and Key Requirements	Friday or Broadland
	Evidence Provided
	DM25 (Archaeology)
	DM26, DM27 (Conservation Areas)
	DM28 – DM31 (Heritage Assets Listed, unlisted and locally listed])
	Policy DM14 covers local distinctiveness. In addition a number of the site allocation polices specifically refer to local matters of historic interest for example Policies BW1 - BW,5 refer to Park Lug an historic feature in Bishops Waltham associated with the Bishops Palace and former hunting grounds. Likewise in Winchester Town Policy WIN3 seeks to protect views and roofscapes that are integral to local character and distinctiveness.
	Policies WIN5-7 also seek to utilise heritage assets in the redevelopment of a key site around the Winchester Station area.
13. Facilitating the sustainable use of minerals (paras 142-149)	
It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs.  However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to	HCC Minerals and Waste Plan was adopted in 2013 and forms part of the development plan for the Winchester district.
secure their long-term conservation (142)  Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)	Para 7.7 of LPP2 includes reference to the Minerals and Waste Local Plan; Minerals and Waste sites are also shown on the Policies Map.
Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.  To be 'justified' a DPD needs to be:	
<ul> <li>Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area.</li> <li>The most appropriate strategy when considered against reasonable alternatives.</li> </ul>	
Participation  Has the consultation process allowed for effective engagement of all interested parties?	Work on LPP1 involved active participation with a wide range of stakeholders and interest groups, including hard to reach groups. The LPP1 addressed the

Soundness Test and Key Requirements	Evidence Provided
	main planning issues for the District and outlines the development strategy.
	LPP2 is concerned with the detailed implementation of the LPP1 strategy and the establishment of development management policies to deal with day-to-day planning applications. The LPP2 does not re-visit the development strategy and the consultation was consequently undertaken at a level appropriate to the proposals and policies being developed.
	The particular development needs for the preferred locations for required sites were developed jointly by the Council working with the local communities. Early engagement on LPP2 commenced in late 2012, with the emphasis on localism the Council sought to work with local communities through their parish councils and elected representatives to determine which sites to allocate. The local communities led consultations on development needs and proposals. The detailed methodology varied according to the particular characteristics of the areas and the wishes of the local communities and further details of the measure undertaken can be found in the Consultation Statement and its updates
	The consultation statement and its updates can be viewed at :
	Consultation Statement Draft Plan 2014
	Consultation Statement 2015
	The whole of LPP2 including the development management policies has been subject to consultation on the draft policies (2014) and has been presented at various Council Cabinet meetings for discussion of issues throughout its development. Council representatives have attended local community meetings and exhibitions at settlements and in Winchester to discuss LPP2 issues. Site specific meetings have also been held, particularly in relation to developments in Winchester and these are also detailed in the consultation statements. The public meetings were open to all to attend and contribute to the discussion of issues.
Research / fact finding Is the plan justified by a sound and credible evidence base? What are the	Evidence base for LPP1 and LPP2

Soundness Test and Key Requirements	Evidence Provided
sources of evidence? How up to date, and how convincing is it? What assumptions were made in preparing the DPD? Were they reasonable and justified?	http://www.winchester.gov.uk/planning-policy/evidence-base/
	Much of the key evidence (for instance on OAN) was carried out for LPP1. The assumption made for LPP2 was that it would implement the key development principles and the pattern and quantum of development established in LPP1.
	Further evidence work was undertaken for LPP2. Detailed technical assessments (eg transport, landscape and policy constraints) forms part of the evidence underpinning the site selections. Particular work has been undertaken by consultants on specific issues that have arisen eg — Specialist Housing for Older Persons Housing Standards in the Winchester District Retail Study Update, New Alresford and B2177, B3354 & A334 Corridor transport studies
	The SA/SEA consider how the evidence supports the strategy and how the LPP2 continues the development strategy established in LPP1. The SA/SEA were undertaken in an iterative manner from start of process and are documented at:
	LPP2 Background Work
	Draft Plan SA 2014
	Publication SA 2015
	Submission SA Update 2016
Alternatives  Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?  Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of	The quantum of development and spatial strategy is established in LPP1. Alternative sites to implement the strategy were considered as part of the selection of sites for LPP2. Options for policies - including development management policies were considered by officer working groups and presented to Council Cabinet for consideration before being consulted upon in the Draft Plan 2014. Changes have been made where appropriate. The report to the Cabinet (Local Plan) Meeting of 16 <sup>th</sup> September 2015 outlines the process taken and provides a list of previous relevant Council meeting where decisions were taken.
the DPD from the start?	The Consultation Statements (Reg 18 Reg 19 and Reg 22 provide further

Soundness Test and Key Requirements	Evidence Provided
	information on how policies and site allocations were derived.
	Evidence base for LPP1 and LPP2:
	Planning Policy: Evidence Base
	Early engagement with parishes and assessments of sites (including SA of potential sites):
	LPP2 Background Work
	SA/SEA undertaken in an iterative manner from start of process see above and also::
	Draft Plan SA 2014
	Publication SA 2015
	Submission SA Update 2016
<b>Effective:</b> the plan should be deliverable over its period and priorities.	based on effective joint working on cross-boundary strategic
To be 'effective' a DPD needs to:	
Be deliverable	
Demonstrate sound infrastructure delivery planning	
Have no regulatory or national planning barriers to its delivery	
Have delivery partners who are signed up to it	
Be coherent with the strategies of neighbouring authorities	
<ul> <li>Demonstrate how the Duty to Co-operate has been fulfilled</li> <li>Be flexible</li> </ul>	
Be able to be monitored	
Deliverable and Coherent	
• Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of	The vision and objectives for Winchester District are set out in LPP1 at Section 2. The LPP1 describes the development strategy for the Winchester District and includes allocations for strategic development together with a series of

Soundness Test and Key Requirements	Evidence Provided
<ul> <li>the DPD?</li> <li>Are the policies internally consistent?</li> <li>Are there realistic timescales related to the objectives?</li> <li>Does the DPD explain how its key policy objectives will be achieved?</li> </ul>	core policies. Section 1 of LPP2 explains how Part 2 relates to LPP1 and the vision, objectives and strategic policies set out therein. The relationship of the LPP1 policy areas to the relevant LPP2 policy areas is shown in a table at 1.15.
	LPP2 has been checked for internal consistency and for consistency with LPP1. The SA also considered this as part of its assessment.
	The deliverability and availability of sites was part of the assessment criteria for site selection. Section 2.11 of LPP2 describes the site selection process and includes reference to ensuring sites could be delivered and the removal of sites from consideration if delivery was not probable.
	Viability assessments have been undertaken for site allocations which were not already in the proves of being brought forward.
	The relevant delivery agencies have been consulted through the course of the development of the Plan as detailed in the Consultation Statements (Reg 18 and Reg 19). An Infrastructure Delivery Plan has been prepared for LPP2.
	LDS was updated in October 2015 and reflects the most up to date timetable and relationship between LPP1 and LPP2 and the need to undertake a specific DPD on Gypsies and Travellers Accommodation.
Infrastructure Delivery	An Infrastructure Delivery Plan has been prepared specifically addressing the
<ul> <li>Have the infrastructure implications of the policies clearly been identified?</li> </ul>	delivery of the proposals and policies of LPP2, updating earlier versions
• Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	A District-wide viability assessment was undertaken for LPP1, covering the deliverability of the OAN. The site allocation policies were subject to viability
• Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies?	testing to determine deliverability and where necessary requirements of the policy have been adjusted. Site viability assessments for LPP2 are available as part of the evidence base for the site assessments.
	Discussions have been held with the infrastructure delivery agencies on specific sites or in areas where particular needs have been identified and the site allocation policies specify any site specific infrastructure provision where necessary These particularly relate to localised flooding issues, groundwater

Soundness Test and Key Requirements	Evidence Provided
	protection, connection to sewage systems and education provision.
	Some of the LPP2 sites have planning applications in the pipeline and the infrastructure agencies have assisted with the delivery of these sites. Examples include SW1 and WC1.
Co-ordinated Planning  Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?	Section 1 of LPP2 sets out the relationship of LPP2 with other plans, including its geographical coverage, which is limited to Winchester District and excludes the SDNP.  LPP2 implements elements of the planning strategy that were not covered in LPP1. The planning strategy reflects wider aims and objectives of the Council and these are detailed further in the LPP1. LPP1 and LPP2 are structured to reflect the Community Strategy.
	Coordination with other authorities and bodies responsible for strategies affecting the area has been undertaken under the Duty to Cooperate.
<ul> <li>Flexibility</li> <li>Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?</li> <li>Does the DPD include the remedial actions that will be taken if the policies need adjustment?</li> </ul>	References to housing requirements in the site allocations are expressed as 'about' and the policies are not overly prescriptive, with the details to be determined as part of the consideration of planning applications. This promotes flexibility.  The SA includes a section on monitoring and Appendix D of LPP2 sets out a comprehensive monitoring framework which includes reference to spatial objectives and SA/SEA objectives, with a target and indicator for each policy, together with a suggested data source.
	The monitoring framework guides the assessment of the effectiveness of polices. Information contained in the AMR will show where policies may need to be reviewed. The housing delivery is of particular interest and the AMR provides detailed monitoring of delivery in relation to the housing trajectory and the 5yr land supply.
	A risk analysis of the planning strategy was carried out at the time of LPP1 and consideration of the robustness of the plan as a whole and the policies within

Soundness Test and Key Requirements	Evidence Provided
	it is part of the SA analysis.
<ul> <li>Co-operation</li> <li>Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined?</li> <li>Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</li> </ul>	See Duty to Cooperate statements:  Duty to Cooperate Part 1 (Draft Plan 2014)  Duty to Cooperate Part 2 (Publication 2015)  Duty to Cooperate Part 3 (Submission Update)
<ul> <li>Monitoring</li> <li>Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)?</li> <li>Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report?</li> <li>Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report?</li> </ul>	The major elements of the quantity and distribution of housing are set and described in LPP1.  Section 7 of LPP2 sets out the approach to the implementation and monitoring of LPP2. Appendix D of LPP2 includes a comprehensive monitoring framework which cross refers to the sustainable community strategy and the SA/SEA objectives. The monitoring framework includes indicators and targets. Trajectories are included in LPP1 and the AMR and updated on an annual basis. The annual update includes assessment against housing targets and will identify any need to revise or review the Plan.
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.  The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.	
<ul> <li>Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification?</li> <li>Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included?</li> </ul>	The rationale for the planning strategy for the District is contained within LPP1, which also contains Core Policies which address the main areas of national policy.  The SA has considered the developing policies of LPP2 against the NPPF.  The development management policies of LPP2 cover many of the detailed elements of national policy. The section on NPPF Principles in this Self-Assessment shows in detail how the policies are relevant to particular parts of

Soundness Test and Key Requirements	Evidence Provided
	national guidance.
	Studies on various elements of housing need were undertaken to support the policies in LPP2. The Specialist Housing for Older Persons r Housing Standards studies considered whether additional policy requirements should be included within LPP2 to cover these issues. As a result of these studies, DM2 was amended to include some space and accessibility standards. The Older Persons Study considered that CP2 of LPP1 adequately provides for a range of housing to fulfil local needs and that no additional policy guidance was necessary.
	CP2 of LPP1 is inclusive rather than exclusive and encourages specialist housing types of housing to meet a range of housing needs. The policy specifically refers to specialist accommodation for older persons. Although CP2 does not directly promote self build or starter homes, it provides general encouragement for a range of housing and therefore does not preclude it. It is not considered necessary to have a particular policy on these issues as the policy approach would not differ from that in CP2.

#### Planning policy for traveller sites

This section of the PAS Self-Assessment Checklist detailed the guidance from the 2012 PPTS.

Winchester City Council will now be considering the needs of gypsies and travellers in a stand-alone DPD. The LDS details the timetable for its production. The <u>Background Paper 2 – Gypsy and Traveller Accommodation</u> provides further information on the Council's approach to gypsy and traveller needs and accommodation.

As the issue of gypsies and travellers is no longer covered in LPP2, this is not considered any further in the LPP2 Self-Assessment Checklist.

#### Integration of marine and terrestrial planning

This section of the PAS Self-Assessment Checklist considered marine planning, particularly the local Marine Management Organisation (MMO) and the national Marine Planning Statement (MPS).

Winchester District is one of the local authorities listed as having some overlap with the marine planning area. The area of the District is very small and limited to the tidal section of the River Hamble where it falls within the Winchester District. The Council has consulted the MMO on LPP2 under the Duty to Cooperate. The MMO had no specific comments to make on the Consultation Draft of LPP2, although its response drew attention to the remit of the organisation and the MPS. The Council has also provided the MMO with information on the LPP1 and Saved Policies of the Winchester District Local Plan 2006 for the purposes of the preparation of the South Marine Plan, which is at an early stage of preparation.

It is considered that the Council has undertaken appropriate actions to address potential issues relating to marine planning. Given the nature of the marine environment in the Winchester District any effects are likely to be minimal. Continued liaison with the MMO will ensure that any particular issues arising will be addressed.