

**Winchester District Local Plan Review**  
**Analysis of Representations on the Revised Deposit Plan**

**Issue: 3.1 (Deposit 3.3)**

**RD03.01-02**

**Para. 3.5-3.6: Design-led approach**

**Representations:**

**Objections:**

**Kingfisher Housing Association (2312/1)**

Whilst we are supportive of the introduction of a design-led approach, it should not be overly prescriptive or restrictive. All circumstances should be considered and there should be room for flair and innovation. To justify the label 'design-led', this should be made explicit.

**Change sought**-amend wording to reflect above objection.

**Kingfisher Housing Association (2312/2)**

The reference to Government guidance is supported, however it must be used in a flexible manner. Specific design styles or vernacular should not be imposed.

**Change sought**-amend wording to reflect above objection.

**City Council's response to representation**

A design-led approach is required by the Local Plan to help ensure that every development proposal, of whatever scale, responds positively and sympathetically to the particular characteristics of a site and its surroundings, whilst re-enforcing local distinctiveness and environmental quality. This is particularly necessary to help create balance whilst meeting the increased need to use previously developed land and to increase housing densities. This is why RD03.01 explicitly states that the design-led approach will ensure development proposals respond positively to particular characteristics of the site and surroundings. It is not considered that this means there is no room for 'flair'. Paragraph RD03.02 encourages imaginative designs where they do not compromise the quality of the environment.

**Change Proposed –none.**

**Issue: 3.2 (Deposit 3.5)**

**RD03.04**

**Para. 3.10: Design-led approach-supplementary planning guidance**

**Representations:**

**Objections:**

**Save Barton Farm Group (175/4)**

Contrary to policy RD 03.04, Save Barton Farm Group has had no encouragement or support from the City Council in preparing or presenting any guidance documents.

**Change sought**-more consultation with the local community is needed.

**Kingfisher Housing Association (2312/3)**

Bringing forward design briefs and supplementary planning guidance should be done in a manner that accords with the advice contained in PPG12. Local people should be given a chance to state their views on a particular development or design statement.

**Change sought**-amend wording to reflect above objection.

**City Council's response to representation**

The wording of the proposal is designed to recognise the importance of the involvement of local communities in developing this kind of planning guidance. The very basis of the SPG approach is involving local communities, as stated in RD03.04. The approach can be used as a way of ensuring that local communities can have a say in the types of designs that are acceptable.

The Council is not aware of an approach from the Save Barton Farm Group about attempting to shape the design of the possible development. As the site is only a reserve site there is still the possibility that development may not occur. It would not, therefore, be appropriate at this stage for anyone to invest effort, time or money in developing detailed design proposals for this site.

**Change Proposed –none.**

**Issue: 3.3 (Deposit 3.6)**

**RD03.05**

**City Council's response to representation**

The partial support is welcomed. The text that respondent 253 is

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**Para 3.13: Design-led approach-appraisal requirements in large/sensitive sites**

referring to is part of the explanatory text for the design-led approach. Further explanation about flood risk assessment is given in the section on flood risk in paragraphs 3.41 and 3.43.

**Change Proposed –none.**

**Representations:**

**Objections:**

**Environment Agency (253/1) and (253/3)**

Partially resolved objection to RD03.05 but also objection to the wording of changed paragraph 3.13.

**Change sought** –change the wording from ‘the consideration given to flood risks’ to ‘inclusion of a flood risk assessment, in accordance with Appendix F of PPG25.’

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**Issue: 3.4 (Deposit 3.8)**

**RD03.06**

**Proposal DP.1: Design statements**

**City Council’s response to representation**

It is thought that the comma in ‘sensitive sites, those exceeding 0.5 hectares in sizes’ is appropriate, as these are two cases in a list of three in which site analysis is required. The third case in which site analysis is required is for development proposals that have a significant impact on the local area.

**Representations:**

**Support/resolved/withdrawn:**

**GOSE (261/6)**

Support the change in RD03.06.

**Change sought**–none.

Design statements are sought for all applications (Proposal DP.1). In all cases a full site analysis would be encouraged, but in some cases it is seen as essential. This is considered to be in sites where development has very significant potential impacts. This is the case in sensitive sites, sites that may have a significant impact on local communities and large sites.

**Objections:**

**J Porter (Councillor) (2263/1)**

The phrasing in RD 03.06 lacks clarity on whether all sites over 0.5 hectares are included.

**Change sought** –replace the comma in: ‘particularly in the case of more sensitive sites, those exceeding 0.5 hectare...’ with ‘and’.

Sites over 0.5 hectares are considered large and through their size alone are significant. Smaller sites may be sensitive and so might also require a site analysis.

**Change Proposed**–none.

**BT Plc (2108/1)**

The requirement to provide a design statement on all sites of 0.5 hectares or above is onerous and unnecessary. It increases the expense and time of developing proposals and thus may deter them.

**Change sought** –none

**Kingfisher Housing Association (2312/4)**

The need for a design statement should be governed by impact and not size, otherwise large developments that may nevertheless have small impacts will still require a design statement when this may be an unnecessary burden.

**Change sought**–amend wording to reflect above objection.

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**Issue: 3.5** (Deposit 3.13 and 3.14)

**RD03.08**

**Proposal DP.3: General design criteria-general**

**Representations:**

**Support/resolved/withdrawn:**

**GOSE (261/7)**

Support the change in RD03.08.

**Change sought-none.**

**Objections:**

**Soberton Parish Council and VDS Group (1080/1)**

Support for the changes in criterion i) in RD 03.08.

**Change sought-none**

**J Hayter (138/19)**

The proposal is difficult to interpret, as it has to cover a whole range of development.

**Change sought-restructuring of the whole chapter.**

**Upper Itchen Valley Society (2286/1)**

The last sentence in RD 03.08 is too loosely worded.

**Change sought-add to the end of RD 03.08 (i) 'and there should be a presumption against tandem or back land development.'**

**GOSE (261/1)**

The text is too detailed to include in the wording of the policy. Also, there is no definition of 'the features, which contribute to the character of the wider area'.

**Change sought-the text should be removed from the wording of the policy and included in the text with appropriate clarifications, which are in accordance with paragraphs 8.19 and 8.20 of PPG3.**

**Save Barton Farm Group (175/5)**

Application of this policy to development at Barton Farm suggests that land north of Well House Lane must also be facilitated for future development. If this is correct the council should make it clear that the area up to Three Maids Hill could be developed

**Change sought-development should not be contingent on any other site.**

**City Council's response to representation**

The support is welcomed.

This proposal refers only to general design criteria. These are criteria considered to be important in achieving good quality design in any situation. More specific requirements can be found in other policies.

This particular Proposal, therefore, is designed to cover a wide range of situations and circumstances. The particular combination of features on any one site are likely to be unique, meaning that the term 'features' needs to be all-encompassing. To specify the particular features could be to miss an unusual or site-specific feature or group of features that should be conserved. Similarly, the use of the word 'appropriate' is supposed to allow for specific consideration of individual sites.

It is considered that the whole Proposal is too important to put any of it in the explanatory text. It is a central policy in enabling delivery of the aims of PPG3.

Criterion (vi) refers to facilitating the development of land where this is provided for by the local plan. Land north of Well House Lane could not be developed in accordance with the Plan and Proposal DP.3 does not therefore apply.

**Change Proposed-none.**

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**Issue: 3.6** (Deposit 3.4 and Deposit 3.14)

**RD03.03 and RD03.08**

**Paragraph 3.8 and DP.3: density**

**Objections:**

**City Council's response to representation**

The aim of achieving higher densities is inline with government guidance. PPG3 emphasises that higher densities are desirable for many reasons, and they are an important part of achieving many policy aims. Higher densities often mean that services such as local shops and public transport are better supported and more viable.

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### **Soberton Parish Council (2288/1)**

Object to the policy RD 03.03 as it seeks increased densities and ceases to respect adjacent plot sizes.

**Change sought-** *None specified.*

### **Twyford Parish Council (328/2)**

An exception should be made to the requirement of a density of 30 to 50 dwellings per hectare in areas that are low density in character, particularly if they adjoin countryside; in countryside where gardens, open space and historic layout are features; and where infrastructure is not up to standard. Land with special features should be excluded from calculations of net density.

**Change sought-** *none specified.*

### **Bewley Homes (386/1) RD 03.08 Bryant Homes (397/1) Linden Homes (446/1) Hawthorne Kamm (374/1)**

Policy RD 03.08 does not comply with PPG3, which states only that housing developments of 30 to 50 dwellings per hectare should be encouraged, rather than suggesting this as a mandatory figure.

**Change sought-** *reword criteria i) to say that a minimum of 30 dwellings per hectare should be encouraged.*

### **J Porter (Councillor) (2263/2)**

Density figures should not be stated in RD 03.08. PPG3 only offers figures as guidance. Also, in criterion (i) the statement that it may be appropriate to exclude certain features when calculating density is too weak. Criterion (iii) should ensure there is room for delivery vehicles to turn if there is full parking. It is not clear whether policies in RD 03.08 refer to the need to ensure old properties are not overlooked by new.

**Change sought-** *In criterion (i) remove the figures of required density and change the last sentence to say special features 'must be excluded', rather than 'it may be appropriate' to exclude them. In criterion (iii) include a statement about turning and add 'does not overlook neighbouring properties' to criterion (ix).*

### **M K Charrett (1370/1)**

The changes proposed in RD 03.08 still do not ensure that the protection offered by EN1 in the adopted Local Plan is continued. In RD 03.08 the council is applying PPG3 as a directive, rather than as guidance. The previous wording of 'at least 30 dwellings per hectare' was more appropriate. The phrase 'respond positively to the character, appearance and variety of the local environment' is too weak. There needs to be more attempt at allowing types of development appropriate to the area and that local communities wish to see.

Encouraging higher densities is also a way of ensuring the protection of greenfield sites. To protect greenfield sites, there is a preference for the use of brownfield sites. It is important to ensure that this brownfield land is used as efficiently as possible so to achieve the objective of protecting greenfield sites. Efficient use of land requires developments with higher densities of dwellings per hectare than are generally being built at the moment. PPG3 states that the current average density of 25 dwellings per hectare cannot be sustained.

PPG3 takes the view that attractive designs can be achieved with high densities. It is also the case that high densities need to be well designed to be successful but, with care, high-density development may add to the character of an area.

The Winchester District Local Plan has to broadly follow changes in government aims and guidance. An important general aim of the Local Plan is to encourage development that utilises urban capacity. Any significant restriction on the development potential of brownfield sites identified as suitable for development would be likely to result in the allocation of greenfield sites in compensation. Therefore the Local Plan proposes densities of 30-50 dwellings per hectare or higher where there is good public transport. This means that there is the potential to vary the density of the development depending on the characteristics of the location. However, it is also consistent with the statement in PPG3 that developments of less than 30 dwellings per hectare should be avoided as they represent an inefficient use of land.

Another basic aim of the Local Plan is to achieve high-quality, well-designed development, which is not harmful to existing development. It would not be appropriate to refer to detailed parking issues, such as turning circles within this proposal. Proposal T.4 deals with parking provision. It is an implicit element of providing parking spaces that there will be enough space for turning. As outlined in PPG3, it is necessary to be stringent in the application of design principles, to ensure that higher density developments are successful and do not harm local character. There are a large variety of different characteristics and design features that can form the special character of an area. Developments at high densities can respect these features and criterion (ii) requires that the design, scale and layout of development responds positively to the existing local environment. The Local Plan also allows for the exclusion of features that add to the special character of the area in calculations of net density. This is covered in criterion i) of Proposal DP.3. This is designed specifically to protect features such as trees. It is not, however, designed to prevent 'backland or tandem development'.

Notwithstanding the above, the Council has recently undertaken a review of the way in which PPG3 has been implemented. A Report has been considered by Local Plan Committee, Principal Scrutiny Committee and Cabinet. The conclusion is that there is some scope for further emphasising the importance of the character of the area.

It is proposed that Proposal DP.3 of the Revised Deposit Local Plan be amended. An additional criterion should be added to refer to appropriate Supplementary Planning Guidance and bring together local aesthetic design issues with the requirements of PPG3.

There is development potential from a range of sources within the existing built-up areas, including the gardens of existing properties. A more comprehensive development, rather than applications for development of, for example, one garden in a row of similar plots, could overcome problems of inward looking and unrelated developments, as well as potentially bring the proposed development above the affordable housing threshold as well as being more likely to result in on-site open space provision and combined access arrangements. A Development Brief would also allow for a more coherent approach to the overall design of the development and for

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**Change sought-** *amend the end of criteria i) to say features that contribute to the character of the area 'must be excluded from the development area', rather than 'it may be appropriate...'*

**J A Morse (1089/1)**

Object to the change in wording from 'at least 30 dwellings per hectare' to '30-50 dwellings per hectare' as this seems designed so that planners can squeeze more dwellings in, and this may lead to alteration of the character of Soberton and Soberton Heath.

**Change sought-** *revert to the wording 'at least 30 dwellings per hectare.'*

**M Bell (2245/1), V and T Long (2298/1)**

PPG 3 allows for some flexibility in housing densities, however, this is not reflected in the local plan. The requirement to meet a minimum density is also contrary to PPG3. This is necessary to ensure sustainability in settlements. As meeting these densities would not always meet requirements to 'respond positively' to local character, fewer sites may come forward for development and fewer applications will be acceptable.

**Change sought-**

2245: *re-instate the word generally in reference to housing densities, and recognise that lower densities are appropriate in some cases.*  
2298: *none specified.*

**D F and J Walker (2165/1)**

High densities of 30-50 dwellings per hectare are proposed in RD 03.08. This contradicts the requirement to 'consider and respond positively' to the local character, and may be unsustainable in some cases.

**Change sought-** *none specified.*

**Compton Down Society (2278/1)**

The revised text fails to allow for situations on non-sustainable sites where lower densities may be appropriate.

**Change sought-** *after 'density of 30-50 dwellings per hectare' add 'on sustainable sites'.*

**Kingfisher Housing Association (2312/5)**

PPG 3 sets out a clear definition of what is implied by a 'net' site area and indicates that such a definition should be applied in order to calculate density. The reference to excluding certain areas from the gross area is inappropriate, but should be brought forward alongside other facets of PPG3 advice.

**Change sought-** *amend wording to reflect above policy.*

**Itchen Valley Parish Council (286/1)**

The proposal in RD03.08 is not specific

better account to be taken of the characteristics of the area.

The Council cannot refuse permission for development that is otherwise acceptable, simply because comprehensive development would be better. It could not realistically seek comprehensive development in every case or impose a minimum site size threshold. The current Local Plan policies would, however, warrant refusal if development would reduce the development potential of other land, fail to provide for future access, or set a precedent for individual backland developments which would detract from the quality of the local environment. Comprehensive development could be achieved by allocating land for comprehensive development but it is likely to be impossible to identify every case in which groups of dwellings within the settlements may come forward for development. The alternative is to include a more general policy requirement that development briefs should be produced for areas with development potential. The necessary requirement is to be achieved by adding a new criterion (iii) in Proposal DP.3, along with explanatory text.

**Change Proposed-Proposal DP.3:**

**Proposed amendments to Proposal DP.3, criterion (ii):**

*... (ii) in terms of design, scale and layout, responds positively to the character, appearance and variety of the local environment, reflecting its distinctive development forms and patterns of building, spaces, means of enclosure, townscape and landscape and incorporates in the design those features which are important to the history and form of the area. Account should be taken of local character, especially as identified within any adopted supplementary planning guidance (e.g. Village/Neighbourhood Design Statements) or technical studies (e.g. "Winchester City and its Setting");*

**Add new criterion after existing (ii) and new paragraphs after paragraph 3.19:**

*Proposed amendments to DP.3, add new criterion after existing (ii) DP.3... (iii) includes provision for the comprehensive development of other nearby land, where this forms an area of uniform character, through the production of a development brief. Development should accord with the principles established in the development brief, to ensure important features and characteristics are identified, secure adequate provision of infrastructure and facilities, and avoid inefficient use or sterilisation of land:...*

*...3.20 There are substantial development opportunities within the existing settlements, especially in the predominantly lower density suburban areas of the District's towns and villages. These opportunities can usually be developed at higher densities than the surrounding development, subject to the requirements of Proposal DP.3 (i) and (ii). It is, however, important to avoid the development of a series of discreet and inward-looking developments, which could harm the character of the areas concerned, fail to provide adequate transport linkages, facilities and affordable housing, and prevent the efficient use of other land.*

*3.21 In order to overcome these potential problems, Proposal DP.3 (iii) seeks the production of a development brief (unless one has already been adopted) covering nearby land, where this consists of plots of consistent size and character. These nearby areas may also come forward for development and a brief will help to ensure that important characteristics of the area are identified and taken into account, that efficient use is made of land, and that adequate facilities, access and linkages are provided. Briefs should be subject to public consultation so as to enable them to be adopted as supplementary planning guidance by the planning authority. Once a brief is adopted, development proposals for parts of the area concerned will be permitted, provided they accord with the*

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enough regarding the meaning of 'features' and when it 'may be appropriate to exclude these from the developable area'.

**Change sought**-add to the end of RD 03.08 the sentence: 'and it will always be appropriate to exclude land from such developable area where backland or tandem development would result.'

**Save Barton Farm Group (175/3)**

Object to RD 03.03 as development of any density will be damaging to Barton Farm.

**Change sought** –none specified.

*requirements of the brief and relevant proposals of this Plan...*

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**Issue: 3.7 (Deposit 3.16)**

**RD03.08**

**Proposal DP.3: General design criteria-parking**

**Responses:**

**Objection:**

**Kingfisher Housing Association (2312/6)**

Although the revisions allow some flexibility, this is not sufficient to encompass the range of issues that can influence parking provision. The reference to T.4 is incompatible and should be removed to allow consideration of this policy on its own merits.

**Change sought**-amend wording to reflect above objection.

**City Council's response to representation**

It is important to include this policy as part of the general design criteria, to make it clear that developments must be designed to meet parking standards. Cross-reference to T.4 is seen as necessary to give further details about this policy. The basis of T.4 is the Hampshire Parking Standards.

Proposal T.4 follows the new maximum parking standards which have been set by Government and Hampshire County Council. The proposal is designed to minimise parking as far as possible. Account is taken of whether the site is easily accessible by other modes, whether there is other parking available in the locality and whether there are on-street controls. This allows some flexibility.

**Change Proposed**-none.

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**Issue: 3.8 (Deposit 3.13)**

**RD03.08**

**Proposal DP.3: General design criteria- private amenity**

**Responses:**

**Objections:**

**Cala Homes (South) Ltd. (468/10)**

There is no clear justification for apparently unqualified controls given to development and private amenity space by the inclusion of criteria ix or x in policy RD 03.08. There are no definitions of 'adequate', 'appropriate' or 'unacceptable'. These matters are better considered through determination of individual planning applications.

**Change sought**-none specified

**Kingfisher Housing Association (2312/8)**

Criterion x) of RD03.08 is ambiguous and does not offer enough certainty for developers. The use of the term 'appropriate' is unclear and should be

**City Council's response to representation**

The criteria listed are requirements that enable good design in all types of development, as is consistent with the Plan's overall intentions. However, as the criteria are part of a Proposal about general design criteria it is appropriate to adopt a flexible and not overly-prescriptive approach. It would seem more practical and appropriate for informed value judgements regarding elements that are of 'importance', to be made at the time of dealing with individual development proposals.

Criteria (ix) and (x) are both variable requirements. They are likely to differ depending on factors such as the scale and density of development and whether there is a proposal for multi-unit developments where communal arrangements and provisions may be necessary, as opposed to single family dwelling units in their own plots. Therefore, it is not possible to be more specific. The policy is designed to ensure that consideration is given to these aspects when considering individual planning applications. However, criterion (ix) does give some of the considerations to be taken into account when determining whether amenity space is adequate, such as the size and design of the development. The effect of residents 'looking out' from a proposed development onto existing dwellings is considered to be adequately covered by criterion (vii) of Proposal DP.3.

**Change Proposed**-none.

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clarified.

**Change sought**-none specified.

**Kingfisher Housing Association  
(2312/7)**

The failure to define 'adequate' (in terms of private amenity space) or 'unacceptability' (in terms of overlooking) will create uncertainty and limit the value of the policy.

**Change sought**-amend wording to reflect the above objection.

**Bishops Waltham Society (212/16)**

The objections to DP.3 are partially resolved. The changes resulting from our comments labelled B, C, E, F and H are supported. We still object that changes we requested in points A, J, I, K were not made, in some cases with no explanation. Our point D led to the supported addition of 'looking in' but does not include the equally important 'looking out'. Criterion ix) has been added to DP.3, and DP.7 deleted. However, the phrase 'not unacceptably overlooked by neighbouring properties' is objected to because this is not based on Guidance, there is no basis for determining 'acceptable', and most residences are overlooked by neighbours.

**Change sought**-not specified.

**GOSE (261/2)**

Appropriate aspects relating to the quality design and amenity are already sufficiently covered within the wording of the policy and therefore the words 'not unacceptably overlooked by neighbouring properties' are unnecessary, overly restrictive and can have a detrimental effect on achieving high-density urban development. The word 'adequate' lacks clarity.

**Change sought**-define adequate.

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**Issue: 3.9 (Deposit 3.20)**  
**RD03.09**  
**Proposal DP.5: Townscape and Landscape**

**Representations:**

**Support/resolved/withdrawn:**

**English Nature (251/6)**

Resolved objection  
(251/7/WDLRP/DEPOS).

**Change sought**- none

**Bishop Waltham Society (212/17)**

Support the changes to DP.5(ii).

**Change Sought:** none

**Environment Agency (253/2) and  
(253/14), The Wildlife Trusts (330/3)**

**City Council's response to representation**

The support is welcomed.

In the case of the most important and sensitive features any development that occurs around them is likely to be harmful. Therefore, Proposal DP.5 states that development can only go ahead if it does not detract from, or result in the loss of, features specified in the policy. It is expected that where a development goes ahead there has been some assessment of the natural features and habitat of the site, and that it has been judged that development on the site will not harm important features.

Criterion (i) of Proposal DP.5 was re-worded so that it was clear what types of views should always be protected. These are public views that are of identified importance. Thus the intention of this policy is to give protection to views that are recognised as being important.

In larger and more sensitive sites a site analysis is required as part of the design statement necessary for all applications. This requirement is outlined in Proposal DP.1. This, as well as potential assessments

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The Environment Agency's objections to proposal DP.5. and to proposal DP.5 (vi) are resolved. The Wildlife Trust supports the addition of RD03.09 to the plan.

**Change sought-***none.*

### **Objections:**

#### **English Nature (251/8)**

Development should incorporate the site's natural features that provide a wildlife habitat and utilise these as a physical framework for the design of the development. Development that may adversely affect habitat features should only be permitted if it is shown that mitigation measures can be provided, within the control of the developer, which would reinstate the nature conservation value of the features.

**Change sought-***state within the proposal: 'the LPA will seek all opportunities to consolidate and strengthen wildlife corridors, ensuring the new development within or adjacent to identified corridors contributes to their function through appropriate landscaping'.*

#### **Kingfisher Housing Association (2312/9) Bewley Homes (386/2), Hawthorne Kamm (374/2)**

The elements of rewording in this policy are unclear, particularly the reference to 'site analysis' as it does not clarify who would be responsible for this. It also neglects to define 'recognised importance'.

**Change sought-**  
**309 and 374-re-wording of proposal RD 03.09 to clarify 'site' and 'recognised importance', i.e. whether this is as defined in the local plan or other council documentation.**

**2312-amend wording to reflect above objection.**

#### **Grainger Trust PLC (214/1)**

The value of views should be weighed against other development briefs, but this is not recognised in policy RD 03.09. Criterion vi) should ensure that development is sympathetic to the key characteristics listed in Appendix 2 and is sensitively sited. In criterion vii) a statement of the individual value of features would be more appropriate than a blanket protection.

**Changes sought-***none specified.*

#### **Cala Homes (South) Ltd. (468/3)**

The re-worded policy still results in onerous restrictions that inhibit the design process. Any development that may result in the loss of identified features is restricted, regardless of whether or not there may be a net gain.

**Change sought-***deletion of the proposal.*

by the Council, could identify other important views. A reference back to this policy could add clarity to Proposal DP.5.

Similarly, the other features that this policy aims to protect are all considered of high value and thus should have strong protection. The protection of the specified features may need to be weighed against other issues in determining planning applications but it is appropriate that the Local Plan highlights the importance of views. It becomes increasingly important to balance the need for higher densities with a particularly careful design approach.

The justification for a reserve MDA at Winchester City (North), and also the reason that the specific site at Barton Farm was chosen, is addressed in Chapter 12. If this site is triggered and development occurs, it would have to follow the same development principles that apply to other developments.

### **Change Proposed- addition to supporting text in paragraph 3.26.**

*Important landscape or townscape features may, for example, include important open areas or recreational areas/facilities, subject to Proposal RT.1 or RT.2, or locally important features such as trees, walls, banks, and hedges and views. Important features may be those identified as part of the Design Statement required by Proposal DP.1, or they could be those identified in supplementary planning guidance (such as village/neighbourhood design statements) or other studies.*



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**Save Barton Farm Group (175/6)**

The statements in RD 03.09 that development is not permitted where it would detract from or result in the loss of a variety of features is contradicted by the proposals for development at Barton Farm, which has been identified as one of the most important landscape features in Winchester.

**Change sought-***a commitment to abide by this policy.*

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**Issue: 3.10 (Deposit 3.21)**

**RD03.10**

**Proposal DP.6**

**Representation:**

**Support/resolved/withdrawn:**

**The Wildlife Trusts (330/4)**

Supports the additions in RD 03.10

**Change sought-***none.*

**English Nature (251/7)**

Resolved Objection  
(251/8/WDLRP/DEPOS)

**Change sought-** *none*

***City Council's response to representation***

The support is welcomed.

***Change Proposed-none.***

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**Issue: 3.11 (Deposit 3.21)**

**RD03.11**

**Proposal DP.7**

**Representation:**

**Support/resolved/withdrawn:**

**J Hayter (138/2)**

Support for RD03.11

**Change sought-***none.*

***City Council's response to representation***

The support is welcomed.

***Change Proposed- none.***

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**Issue: 3.12 (Deposit 3.23)**

**RD03.12**

**Proposal DP.8: sustainable development**

**Representation:**

**Support/resolved/withdrawn:**

**Environment Agency (253/4) and (253/5)**

Resolved objection to proposal DP.8 (iv) and (viii)

**Change sought-***none.*

**Objections:**

**Cala Homes (South) Ltd. (468/11)**

Although in support of the objective of achieving sustainable forms of development, the criteria in RD 03.12

***City Council's response to representation***

The support is welcomed.

There have to be restrictions on development if the aim of making it sustainable is to be achieved. This policy is not seen as being overly restrictive, but rather strong enough to ensure that sustainable development aims are met. Inevitably, however, assessing the most sustainable forms and location for development will sometimes involve a weighing up of many different criteria. This was the case when choosing a specific site for Winchester City (North) MDA.

***Change Proposed- none.***

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place unreasonable restrictions of achieving appropriate forms of development.

**Change sought**-none specified.

**RD 03.12**

**Save Barton Farm Group (175/7)**

Criterion (viii) of RD 03.12 states that development should be appropriate in terms of protecting the soil. However, development at Barton Farm would contravene this policy.

**Change sought**-none specified.

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**Issue: 3.13 (Deposit 3.25)**

**RD03.13-RD03.18**

**Proposal DP.9: Aerodrome safety**

**Representation:**

**Objection:**

**GOSE (261/3)**

National Air Traffic Service Ltd (NATS) has issued separate safeguarding maps for Southampton Airport and the safeguarded area for wind turbine development extends for approximately 10kms around the site and falls into Winchester District. Applications for wind turbine development in this area will be subject to separate consultation with NATS as well as with the operator of Southampton Airport.

**Change sought**- this should be reflected in the proposal relating to aerodrome safety. The boundary should be added to Map 46a.

**City Council's response to representation**

It is considered that the comments by respondent 261 would be a useful addition to the text concerning Aerodrome Safety. Therefore references to the NATS safeguarding area within the airport boundary should be added.

**Changes Proposed-**

**RD03.15:**

*Some south-western parts of the District are subject to the safeguarded areas surrounding Southampton Airport and the National Air Traffic Service Ltd (NATS) has prepared additional safeguarding maps which also fall into the District. These are as shown on the Proposals Map and Inset Maps.*

**RD03.16:**

*The Council will consult the operator of Southampton Airport on Planning applications for certain types of development (summarised above) within the officially safeguarded areas established for the Airport (shown on the Proposals and Inset Maps). Additionally, separate consultation will be required with NATS in the case of wind turbine proposals that fall within the safeguarded area approximately 10km around the site, as shown on Map 46a.*

**RD Map 46a: Aerodrome Safeguarding Map:**

*Amend to show the area within which NATS should be consulted on wind turbine proposals (10km of Southampton Airport), by addition to Key.*

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**Issue: 3.14 (Deposit 3.26 Deposit 3.27)**

**RD03.19-RD03.23**

**Proposal DP.10 and DP.11: Flooding**

**Representation:**

**Support/resolved/withdrawn:**

**Environment Agency (253/6) (253/7) (253/8)**

Resolved objections to DP. 10 (iii), DP.11(i) and Paragraph 3.45

**Change sought**-none.

**Objections:**

**Bewley Homes (386/3) Hawthorne Kamm (374/3)** Criterion (iii) does not state

**City Council's response to representation**

The support is welcomed.

The risk and severity of flooding in dry valleys varies. For this reason it is neither possible nor desirable to prescribe a distance away from them at which development would be permissible. Each development proposed in a dry valley needs an assessment of risk specific to that particular location. This is explained in paragraph 3.42 of the supporting text.

It is consistent with PPG25 policy concerning already developed areas in high-risk floodplains to ensure that adequate flood defence exists and can be maintained, that there are suitable warning and evacuation procedures in place and that new emergency infrastructure is not located on these sites. The requirement for buildings to be designed to resist flooding is not specifically mentioned in this part of PPG25. However, it is emphasised in PPG25 that some problems of building on floodplains can be minimised if buildings are well designed. As building on high-risk

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how far buildings should be located away from 'dry valleys' or refer to any explanatory text or maps to clarify this.

*Change sought-proposals should be re-worded to clarify. Criterion (iii) should be more specific and could refer to proposals maps to indicate zones where it is acceptable to build adjacent to 'dry valley floors'.*

### **Kingfisher Housing Association (2312/10)**

Policy DP.10 does not accord with PPG25, in terms of general wording and the interpretation of impact on development in already developed floodplains.

*Change sought-amend wording to reflect above objection.*

### **Bishop's Waltham Society (212/5)**

It is not acceptable that access is merely 'maintained for essential civil infrastructure'-it should be an essential requirement. Also, object to the conflict between DP.10, which refuses development on 'underdeveloped or sparsely developed floodplains' unless for 'essential infrastructure', and DP.11 which allows developments on 'functional floodplains' that include sport, recreation and amenity, as well as essential infrastructure.

*Change sought-revert to the use of 'provided' in DP.10(i). DP.11 should be combined with the new last paragraph of DP.10. Also 'functional floodplains' should be defined in the glossary.*

### **Hampshire County Council (1434/1)**

Necessary and beneficial proposals could be implemented without increasing the risk of flooding and yet they would be prevented by the unnecessarily restrictive nature of Proposal DP.11. Appropriate developments that would not affect the floodplain at County-owned St. Bede's school and Chesapeake Mill, Wickham, would not be possible.

*Change sought-remove the blanket restriction on development and change of use in the floodplain. Emphasis should be placed on landowners and developers to demonstrate that any proposed development would not lead to an increased risk of flooding.*

### **Department of Health (2095/1)**

The word changes have added even more confusion to the policy. The omission of the word 'undeveloped' causes confusion and makes the policy apparently strict

*Change sought-the addition of the word 'undeveloped' between 'change of use in' and 'functional floodplains'.*

### **Kingfisher Housing Association (2312/11)**

floodplains is only likely to be possible if there is already development there, this particular requirement should be included in this section of the Local Plan.

New essential civil infrastructure is not suitable for high-risk floodplains. This is why the Proposal is worded to say that access should be maintained, rather than it being a requirement that access is provided to new developments.

Proposal DP.10 does not refuse all development on undeveloped floodplains, it merely states that residential, commercial and industrial development is not suitable. This means that, if needed, there is still a possibility for other kinds of development. On functional floodplains (DP.11) so few developments are suitable that those which are most likely to be acceptable can be listed.

PPG25 divides policies on high risk floodplains into developed floodplains, undeveloped floodplains and functional floodplains. This structure has been followed by Chapter 3. DP.10 contains policy for developed floodplains in criterion (iv) and then policy for undeveloped floodplains and Proposal DP.11 then refers to functional floodplains.

It is not considered that Proposal DP.11 is unnecessarily restrictive. DP.11 refers specifically to functional floodplains. Restricting the type of developments allowed on functional floodplains is in-line with PPG25, which makes it clear that built development should be avoided in these areas. This is not only because functional floodplains flood frequently (once in a hundred years or more) and are unlikely to constitute a safe or suitable place for development, but also because development is likely to interfere with the functionality of the floodplain and increase the risk of flooding elsewhere.

Policy DP.11 is intended to refer to functional floodplains generally, not merely to undeveloped functional floodplains. If there is already development in a functional floodplain this does not mean that the attitude to further development should be any different to where there is no existing development. However, generally it is expected that little development will have occurred in functional floodplains. PPG25 suggests that few developments are suitable for these areas. Essential infrastructure may be needed to serve developments already there. The requirement that this does not increase the risk of flooding elsewhere and is safe is also in line with PPG25.

Contributions towards to cost of flood defence or alleviation measures are only required if the need for flood defence or alleviation works can be attributed to the proposed development. PPG25 states that the onus is on the developer to prove that their development does not create any flooding risk, or else to put in place the relevant on or off-site alleviation measures. Mitigation measures can be requested through the planning obligations or conditions system. Contributions towards to cost of flood defence or alleviation measures are only required if the need for flood defence or alleviation works is attributed to the proposed development. This is in line with Circular 1/97 on planning obligations, which requires that they are necessary and directly related to the proposed development.

The Barton Farm site is only specified as a reserve and therefore development may never occur. However, if it does, the requirements of Proposal DP.10 will apply. The proposed study will need to be subject to contributions from a number of developments and will be commissioned by the Environment Agency once funding is available.

### **Change Proposed-to Glossary:**

#### **Add new definition:**

**Functional floodplains:** PPG 25 defines functional flood plains as the unobstructed or active areas where water regularly flows or is held in time of flood.

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It is inappropriate to seek developer contributions towards infrastructure elements (flood defence or alleviation works) that are the responsibility of statutory undertakers; this is against government advice and if implemented should be justified within a specific policy, rather than within supporting text.

**Change sought-***amend wording to reflect above objection*

**Save Barton Farm Group (175/8)**

An MDA at Barton Farm does not satisfy all the criteria in RD 03.19.

**Change sought-***none specified.*

**Save Barton Farm Group (175/9)**

The 'proposed study' should have been carried out already. When it is carried out it should not be done by the developer.

**Change sought-***conduct independent rigorous studies now.*

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**Issue: 3.15 (Deposit 3.30)**  
**RD03.24-RD03.26**  
**Para 3.5-3.54 and Proposal**  
**DP.13: pollution generating**  
**development**

**Representations:**

**Support/resolved/withdrawn:**

**Environment Agency (253/9) and (253/10)**

Resolved objections due to changes in RD03.26 and RD 03.24

**Change sought-***none.*

**Support/resolved/withdrawn:**

**GOSE (261/11)**

Support the change in RD03.26.

**Change sought-***none.*

**Objection:**

**Save Barton Farm Group (175/10)**

There should already be a study showing the polluting effects of an MDA at Barton Farm.

**Change sought-***conduct independent rigorous studies now.*

***City Council's response to representation***

The support is welcomed.

The potential for pollution arising from an MDA at Winchester City (North) would need to be assessed once development proposals are put forward. It will be one of the issues to be addressed through the required Environmental Statements.

**Change Proposed-** *none.*

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**Issue: 3.16 (Deposit 3.34)**  
**RD03.28-RD03.29**  
**Proposal DP.16: contaminated**  
**land**

**Representation:**

**Support/resolved/withdrawn:**

**Environment Agency (253/11) and**

***City Council's response to representation***

The support is welcomed.

**Change Proposed-** *none.*

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(253/12)

Resolved objections to proposal DP.6 (ii) and para. 3.64.

**Change sought**-none.

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**Issue: 3.17 (Deposit 3.35)**

**RD03.30-RD03.33**

**Proposal DP.17: public utilities**

**Representations:**

**Support/resolved/withdrawn:**

**T-mobile (2315/2, 2315/3 and 2315/4)  
Orange Personal Communications  
(66/2)**

T-mobile support the changes made in RD03.31, RD03.32 and RD03.33. Orange withdraw objection as RD 3.30, proposal DP17, para (iv) changed to (v)  
**Change sought**-none.

**Support/resolved/withdrawn:**

**GOSE (261/8 261/9 261/10)**

Support the changes in RD03.30, RD03.31 and RD03.32.

**Change sought**-none.

**Objections:**

**T-mobile (2315/1)**

In criterion iii) of RD03.30 the term amenities of a residential area is poorly defined and open to inconsistent interpretation.

**Change sought**-omit the sentence or reword to read: 'proposals affecting sensitive environments and residential amenity will be subject to close scrutiny.'

**National Grid Company Plc. (2327/1)**

Additional text in criterion iii) now acknowledges that regard should be had to essential operational requirements. However, this is not extended to criterion iv). The policy acknowledges the archaeological and ecological constraints of High Voltage underground cables, but there are also substantial economic, technical, operational and environmental disadvantages. They cost 15 to 25 + times more than building high voltage overhead lines, repairs are difficult, and use of above land is restricted. Low voltage underground lines are only about three times the cost of overhead lines.

**Change sought**-add to criterion iv) that there should also be regard for operational and economic constraints.

**Orange Personal Communications  
(66/1)**

RD 03.33 refers to the 'Federation of

***City Council's response to representation***

The support is welcomed.

Respondent 2315 suggests subjecting proposals that affect sensitive environments and residential amenity to close scrutiny, rather than the current proposal, which states that developments that harm these are not allowed. The original wording is more specific as it gives a definite statement that these developments would not be allowed. Strong protection of these features is important. Therefore it is not recommended that the wording be changed.

The Council may have a statutory duty to protect sites that are of national and international importance due to archaeology or ecology. This duty of care must be put above the constraints of operating companies. The proposal refers to the need to 'have regard' to the constraints such as archaeology and ecology, and does not suggest that they will always override economic considerations.

The information supplied by respondent 66 is welcomed. In light of this information a change to RD03.33 is recommended:

***Change Proposed-to RD03.33:***

*Account should be taken of public concern about the impact of such development, where it is a relevant planning consideration, and the ~~Federation of Electronics Industry's Mobile Operators Association's~~ 'Ten Commitments of Best Siting Practice' should be followed.*

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Electronics Industry', however, this operation no longer exists and has been replaced by the Mobile Operators Association (MOA).

***Change sought***-none specified.

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**Issue: 3.18** (Deposit 3.36)

**RD03.34**

**Paragraph 3.71: renewable energy schemes**

***City Council's response to representation***

The support is welcomed.

***Change Proposed – none.***

**Representation:**

**Support/resolved/withdrawn:**

**Terence O'Rourke Ltd. (320/1)**

In support of the additional text RD 03.34 regarding the government's targets for renewable energy.

***Change sought***-none.

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**Issue: 3.19** (Deposit: new issue)

**RD03.35**

**Proposal DP.18**

***City Council's response to representation***

The support is welcomed.

***Change Proposed – none.***

**Representation:**

**Support/resolved/withdrawn:**

**GOSE (261/12)**

Support the change in RD03.35.

***Change sought***- none specified.