

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

**Issue: 4.1 (Deposit 4.1)**

**RD04.00**

**Chapter Title**

**Representations:**

**Support/resolved/withdrawn:**

**J Hayter (138/3)**

Support change to Chapter title RD04.00. Representation also suggests Proposals should be designated CE, in line with the change to the chapter title. It is not clear which proposals apply to the countryside and which also apply to settlements. The Key should include the Plan's date to comply with the Regulations.

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

**Objection:**

**Weatherstone Properties (851/1)**

Objection not specified.

**Change sought** - not specified.

**City Council's response to representation**

The support is welcomed.

The remainder of representation 138/3 is not duly made but it is accepted that it would be more consistent with the changed Chapter title and the proposal numbering system in other parts of the Plan to change the proposals in this Chapter from C to CE. A change is therefore recommended to reflect this. It has already been concluded in the response to the representations on the Deposit Plan, that no further changes to the proposals are necessary. It is already clear which proposals apply to particular parts of the countryside, the countryside in general, or to the settlements as well as the countryside. It is, however, accepted that the proposals that apply to the settlements as well as the countryside could be clarified on the Plan's key sheet, and a change is recommended to reflect this, together with an indication of the Plan's date of publication.

**Change Proposed – Proposal reference numbers:**

Renumber Proposals C.1 – C.27 as CE.1 – CE.27.

**Change Proposed – Key Sheet:**

*In the section "Within the policy boundaries and development frontages of the settlements, the following general proposals may apply:" add, after DP.1 – DP.18, CE.7 – CE.10 (including re-numbered new proposals). Add current Plan stage in an appropriate location on the key sheet.*

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**Issue: 4.2 (Deposit 4.7)**

**RD map 16.01**

**Proposal C.2**

**Strategic Gap**

**Representation:**

**Support/Resolved/Withdrawn:**

**Fareham Borough Council (1423/4)**

Withdraw objection 1423/1/DEPOS

**Change sought** – none.

**City Council's response to representation**

The withdrawal of the objection is welcomed.

**Change Proposed** – none.

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**Issue: 4.3 (Deposit 4.19 and 4.21)**

**RD04.01- RD04.03**

**Proposal C.6, paragraph 4.13**

**and new paragraph (RD04.02)**

**Landscape character: General**

**Representations:**

**Support/resolved/withdrawn:**

**Bishop's Waltham Society (212/1)**

Resolved objection to paragraph 4.13 (212/5/DEPOS). Support changes in new paragraph RD 04.02.

**Change sought** – none.

**City Council's response to representation**

The support / withdrawal is welcomed.

**Change Proposed** – none.

**GOSE (261/13 and 216/14)**

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Support the change in RD04.01 and RD04.93.

**Change sought**- none specified.

**The Woodland Trust (2284/1)**

Supports changes in new paragraph RD04.02.

**Change sought** – none.

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**Issue: 4.4 (Deposit 4.20)**

**RD04.01- RD04.03**

**Proposal C.6, paragraph 4.13 and new paragraph (RD04.02)**

**Landscape character:**

**Development issues**

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

The Local Plan Review is required to be in general conformity with the Structure Plan, and, in order to conform to Structure Plan Policy H4, the Local Plan must identify a site for a reserve MDA at Winchester City (North). Whilst the objection expresses concerns about the outcome of the Structure Plan process, it is not for the Local Plan to challenge the strategic requirements.

**Representations:**

The strategic process will have taken into account the importance of landscape issues, and the Local Plan sets out additional landscape requirements in Proposal NC.3 and at paragraphs RD12.85 and RD12.86. No further change is proposed.

**Objections:**

**Save Barton Farm Group (175/11, 175/12, 175/13)**

The Barton Farm area is a unique landscape character area for Winchester. The development of an MDA there would contravene the wording in new paragraph RD04.02, to 'protect, enhance and restore' the key characteristics of the landscape, and would irreparably harm the landscape character, which Proposal C.6 seeks to prevent.

**Change sought**- retain the existing landscape and its characteristics.

The land at Francis Gardens, Winchester, and Albany Farm, Bishops Waltham, does not fall within the Local Plan's settlement boundaries. The land adjacent to Francis Gardens falls within the River Valley Side Landscape Type, which is described in detail within the Landscape Character Assessment, and forms part of the Upper Itchen Valley Landscape Character Area. Not all areas within a Landscape Character Area may convey all the Key Characteristics, in some areas characteristics have been eroded and may require restoration. Diagram 3 within the Deposit Local Plan, was based on the Hampshire Landscape Strategy, and was used temporarily until the Winchester District Landscape Character Assessment had been completed. It is acknowledged that the Landscape Character Area Map in Appendix 2 is not as clear to read as the more detailed maps within the Landscape Character Assessment. A change to show the map at a larger scale and on an Ordnance Survey base is therefore proposed.

**J Cullen 1413/2**

Proposals for 2000 dwellings at Winchester City (North) are not likely to maintain or enhance the character of the countryside and thus they contradict Proposal C.6.

**Change sought**- delete references to capability of the area north of Winchester to accommodate 2000 new dwellings and infrastructure.

Each planning application is assessed on its merits and the various considerations are weighed for each individual site. No further change is proposed.

**Redrow Homes (Southern) Ltd (474/1, 474/2, 474/3)**

The South Hampshire Lowland and Heath Landscape Assessment Area should not change to the Upper Itchen Valley Landscape Character Area, and Francis Gardens should not be part of it, as it does not share any of the key landscape characteristics. The Local Plan no longer includes a detailed map outlining the extent of the Landscape Character Areas.

**Change sought** – define the extent of the assessed Character Areas in the Plan, and exclude site referred to from the Upper Itchen Valley Landscape Character Area.

It is not considered that there is any conflict between Proposal DP.5 (iii) and Appendix 2. Criterion (v) does however refer to the landscape framework, including the Key Characteristics, and therefore could also refer to the landscape and built form strategies.

***Change Proposed – Diagram 3: Landscape Character Areas (loose in folder on reverse side of Map 7)***

*Reproduce at a larger scale and on an Ordnance Survey base.*

***Change Proposed – Proposal DP.5***

*...(v) 'the landscape framework, including those key characteristics, landscape and built form strategies listed at Appendix 2;*

**Cala Homes (South) Ltd (468/6)**

Landscape character areas are only one of the important considerations when

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planning significant development. The Plan should recognise that other competing objectives should carry weight to achieve sustainable development.

**Change sought** – not specified.

**George Wimpey UK Ltd. (2297/1),  
(2297/2)**

The South Hampshire Lowland and Heath Landscape Assessment Area should not change to the Durley Claylands Landscape Character Area, and Albany Farm, Bishops Waltham, should not be part of it, as it does not share any of the key landscape characteristics. The Local Plan no longer includes a detailed map outlining the extent of the Landscape Character Areas.

**Change sought** – define the extent of the assessed Character Areas in the Plan, and exclude site referred to from the Durley Claylands Landscape Character Area.

**Bishops Waltham Society (212/9)**

There is conflict between Proposal DP.5(iii) and Appendix 2.

**Change sought** – Either delete DP.5(iii) or expand it to include reference to the Landscape and Built Environment Strategies (but not the Key Characteristics), within supplementary guidance.

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**Issue: 4.5 (Deposit 4.23)**  
**RD04.04 - RD04.06**  
**Proposal C.7 and paragraphs**  
**4.14 – 4.16**  
**Landscape designations**

**Representations:**

**Support/resolved/withdrawn:**

**Hampshire County Council (1433/1)**

Withdraw objection to Proposal C.7 (1433/1/DEPOS).

**Change sought** – none.

**East Hampshire AONB Officer (2283/1)**

Support the inclusion of tranquillity and amenity within Proposal C.7.

**Change sought** – none.

**GOSE (261/15)**

Support the change in RD04.05.

**Change sought** - none specified.

**Objections:**

**Bishop's Waltham Society (212/7)**

Object to the addition of 'unless it is essential for the economic or social wellbeing of the area'. If this is not necessary for the areas of countryside

**City Council's response to representation**

The support/withdrawal is welcomed.

The wording of the Proposal is now consistent with the advice in PPG7, and Draft PPS 7 on AONBs. Both advise that the environmental effects of development would be the main consideration, but that planning policies should also facilitate the economic and social well-being of these areas. This is a particular requirement for proposals in these designated areas. It is therefore entirely appropriate that it should be a requirement of Proposal C.7, and no further change is proposed.

The Local Plan Review is required to be in general conformity with the Structure Plan, and, in order to conform to Structure Plan Policy H4, the Local Plan must identify a site for a reserve MDA at Winchester City (North). Whilst the objection expresses concerns about the outcome of the Structure Plan process, it is not for the Local Plan to challenge the strategic requirements. The strategic process will have taken into account the importance of landscape issues, and the Local Plan sets out additional landscape requirements in Proposal NC.3 and at paragraphs RD12.85 and RD12.86. No further change is proposed.

The proposed South Downs National Park is now a material planning consideration, and the current stage of the process is outlined in paragraphs 4.15 and 4.16. It is also referred to under "Landscape Designations" in Appendix 1: Other Plans, Guidance and Designations. Whilst the proposed boundary of the proposed National Park currently extends beyond the existing AONB, the final boundary may change when the statutory process is complete. It would not therefore be appropriate to refer to areas outside the existing AONB, or to seek to give them interim protection through the

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covered by C.6 then neither should it be for an AONB.

**Change sought** - add the new phrase to C.6 or delete it from C.7.

**R Secker (2275/1)**

The proposal to develop Winchester City (North) is in contradiction of the statements in RD 04.04.

**Change sought** - delete proposal to develop Winchester City (North).

**East Hampshire AONB Officer (2283/2)**

Although the National Park designation has not yet been confirmed, it is a material consideration in planning decisions. Changes made to paragraph 4.16 do not adequately address those areas that are currently outside the AONB but may be included within the National Park, for which greater planning controls should apply during the interim period.

**Change sought** - not specified.

Local Plan, at this stage in the process. No further change is proposed.

**Change Proposed** – none.

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**Issue: 4.6 (Deposit 4.24 and 4.26)**

**RD04.07 - RD04.10**

**Paragraphs 4.18, 4.19 and new paragraphs (RD04.08) and (RD04.09)**

**Nature conservation: Wildlife habitats**

**Representations:**

**Support/resolved/withdrawn:**

**English Nature (251/1)**

Resolved objection (251/1/WDLPR/DEPOS)

**Change sought**- None

**Bishops Waltham Society (212/6)**

Support changes RD04.07 – RD04.10

**Change sought** – none.

**The Wildlife Trusts (330/5) (330/6)**

Supports the addition of RD04.07 and RD04.08.

**Change sought** – none.

**Objections:**

**Save Barton Farm Group (175/14) (175/15)**

More research is needed to analyse the extent of the wildlife and its habitats at Barton Farm. The new paragraph RD04.09 is "...to minimise damage and provide compensatory measures to the countryside and natural environment", but this would be inconsistent with the proposal for the MDA at Barton Farm.

**Changes sought** - involve English

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

The support is welcomed.

Proposal NC.3 and the paragraphs referring to nature conservation issues at Winchester City (North) in Chapter 12: New Communities (RD12.84 – RD12.87) already refer to the need to protect and, where possible, enhance habitats. A pre-requisite of this would be the need for a more detailed survey involving the appropriate nature conservation bodies. The issues relating to the principle of the reserve MDA have already been addressed at Issue 12.27 of the Deposit Plan, and the importance of nature conservation issues would have been considered at this stage. Should the MDA be triggered, full account would be taken of nature conservation issues when further detailed studies will be required.

Government advice in PPG 9 on nature conservation requires local plans to include policies indicating the criteria against which the development of a site would be judged, for both designated and undesignated areas, and for the possible provision of new habitats. The new paragraphs reflect this, and it is clear from the PPG that it is not sufficient to rely only on the legislation. No further amendment is therefore proposed.

Ancient woodlands in the District would be covered by the application of Proposal C.9 as they are all SINC. Ancient woodland and other important trees would also be protected from development by Proposal DP.5, which would resist development where it would detract from or result in the loss of trees. Ancient woodland should therefore have sufficient protection in this respect, and no further amendment to the nature conservation proposals is proposed.

**Change Proposed** – none.

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*Nature, The Wildlife Trust and RSPB in a rigorous study of wildlife and habitats in the area. Recognise that, if the proposed MDA is built, it is not possible to 'minimise the damage and provide compensatory measures' to the countryside and natural environment'.*

**Kingfisher Housing Association  
(2312/12, 2312/13)**

The new paragraphs create an additional tier of protection and a framework of control that is inappropriate and not consistent with Government guidance and legislation. Established frameworks exist to protect key species and habitats. The new designation adds an additional constraint to an already complex but effective protection mechanism.

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

**The Woodland Trust (2284/2)**

It is impossible to replace ancient woodland as this habitat has evolved over centuries. It should therefore be given absolute protection. The provision of compensatory measures would not be appropriate.

**Change sought** - amend wording to reflect this (alternative wording suggested).

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**Issue: 4.7 (Deposit 4.24)**  
**RD04.11 - RD04.15**  
**Proposal C.8 and paragraphs**  
**4.20 – 4.22**  
**Nature conservation:**  
**International sites**

**Representations:**

**Support/resolved/withdrawn:**

**English Nature (251/2) & (251/3)**

Resolved objection  
(251/2/WDLPR/DEPOS)(Proposal C.8)&  
(251/3/WSLPR/DEPOS) (Proposal C.9)

**Change sought**- none

**Bishops Waltham Society (212/6)**

Support changes RD04.11 – RD04.13 and RD04.15.

**Change sought** – none.

**GOSE (261/16 and 216/17)**

Support the changes in RD04.14 and RD04.15.

**Change sought**- none specified.

**Objections:**

**Save Barton Farm Group (175/16, 175/17, 175/18)**

Proposal C.8 states that the need for

**City Council's response to representation**

The support is welcomed.

The need for the development will be monitored by the strategic authorities, and the identification of a reserve MDA at Winchester City (North) has already taken into account the importance of nature conservation issues. The Local Plan already refers to the need for further assessment of the effect of development on the cSAC of the River Itchen in RD12.87 (in Chapter 12: New Communities), should the site be triggered. No further amendment is proposed.

The wording of Proposal C.8 on International Sites, and the new Proposal for National Sites (RD04.18) now reflect the wording of the Habitats Directive (for International Sites) or of PPG 9. The phrase "and development proposals will be subject to special scrutiny" is used by the PPG in relation to national sites, and therefore the new Proposal adopts this wording. Although not used for International Sites, other appropriate wording reflecting that used in the Habitats Directive has been used, which aims to protect their highest level status. No further change is therefore proposed.

**Change Proposed** – none.

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development should outweigh the harm done to the nature conservation value of the site. More research is needed to assess the full effect of the proposed MDA at Barton Farm and its effect on the Itchen Valley.

**Change sought** - wait for the outcome of the Itchen Valley Study, and involve English Nature, the Wildlife Trust and the RSPB in rigorous study of the area. Delete Proposal for development at Winchester City (North).

**Bishops Waltham Society (212/6)**

Oppose the deletion of '...and development proposals will be subject to special scrutiny' in RD04.14.

**Change sought** - replace sentence.

**Issue: 4.8 (Deposit 4.24)**

**RD04.16 - RD04.18**

**New Proposal (RD04.18) and**

**new paragraph (RD04.17)**

**Nature conservation: National sites**

**Representations:**

**Support/resolved/withdrawn:**

**Bishops Waltham Society (212/6)**

Support changes RD04.16 – RD04.18

**Change sought** – none.

**Objections:**

**Save Barton Farm Group (175/18)**

There are SSSIs and SINCs in this locality and an MDA will have a detrimental effect on the locality and surrounding areas.

**Change sought** - delete proposal to develop at Barton Farm.

**English Nature (251/10)**

In relation to new paragraph RD04.17, there are currently 16 SSSIs with boundaries that fall wholly or partly within Winchester District.

**Change sought** – amend paragraph

**City Council's response to representation**

The support is noted.

The Local Plan Review is required to be in general conformity with the Structure Plan, and, in order to conform to Structure Plan Policy H4, the Local Plan must identify a site for a reserve MDA at Winchester City (North). Whilst the objection expresses concerns about the outcome of the Structure Plan process, it is not for the Local Plan to challenge the strategic requirements. The strategic process will have taken into account the importance of nature conservation issues, and the Local Plan sets out additional nature conservation requirements in Proposal NC.3 and at paragraphs RD12.86 and RD12.87. No further change is proposed.

Discussions have been held with English Nature to clarify the number of SSSIs that exist in the District. It has now been agreed that 17 SSSIs lie wholly or partly within the District, and a change is proposed to reflect this.

**Change Proposed – New Paragraph RD04.17**

*Amend the first sentence to read:*

~~Within the District, 17-20 Sites of Special Scientific Interest (SSSIs) have been designated~~ entirely or partly within the District, and these are of key importance nationally.

**Issue: 4.9 (Deposit 4.25)**

**RD04.19 - RD04.22**

**Proposal C.9, paragraph 4.23,**

**and new paragraph (RD04.22)**

**Nature conservation: Locally designated sites**

**Representations:**

**Support/resolved/withdrawn:**

**Bishops Waltham Society (212/6)**

**City Council's response to representation**

The support/withdrawal is noted.

It would not be appropriate to amend or create new SINCs through the Local Plan process, and this is not required by PPG 9. What the PPG requires is that the Local Plan should include policies on them, indicating the criteria against which development affecting a site will be judged. This is entirely different to the procedures for establishing new SINCs or amending existing ones. These areas are regularly updated and it would not be appropriate to propose changes through the statutory local plan procedures. No change is therefore proposed.

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Support changes RD04.19 – RD04.22.  
**Change sought** – none.

**GOSE (261/18)**

Support the changes in RD04.21.  
**Change sought**- none specified.

**The House Builders Federation (Southern Region) (266/1)**

Support changes to Proposal C.9  
**Change sought** – none.

**English Nature (251/4)**

Resolved objection  
(251/4/WDLPR/DEPOS) (Proposal C.10).

**Hampshire County Council (1433/2)**

Support changes to subheading, Proposal C.9 and paragraph 4.23.  
**Change sought** – none.

**Objections:**

**Kier Land (2273/1)**

Amendments to SINC's or the addition of new ones should be undertaken through the Local Plan process.

**Change sought** - amend RD04.19 to state that changes to SINC's will be undertaken through the Local Plan process.

**The executors of E S Edwards (deceased) (2285/1)**

In the proposed changes to Proposal C.9, the criteria against which it would be demonstrated that the need for development outweighs the harm to the nature conservation value of the site should be defined.

**Change sought**- delete 'it can be demonstrated that' from RD04.21, or set out criteria in additional supporting text.

**Kingfisher Housing Association (2312/14)**

The proposed amendments in RD04.19 – RD04.21 seek to strengthen the designations to an extent that is inappropriate and in conflict with Government guidance. In particular, the inclusion of the terms 'harm', 'demonstrated that' and 'likely to', cannot be justified in the context of this designation.

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

**GOSE (261/4)**

The Proposals Map should identify the areas designated as Local Nature Reserves, as required by PPG9.

**Change sought** – amend Proposals Map.

It would be difficult to define a common set of criteria against which to judge whether the need for the development would outweigh the harm to the nature conservation value of the site. It is considered that each development proposal should be judged on its merits, taking into account local circumstances. It would then be quite appropriate to require developers to make a case and demonstrate that the need for their development is greater than the harm that would be caused to the nature conservation value of the site.

The wording used in the proposed amendments is considered to be entirely consistent with Government guidance and the level of the nature conservation designation. The word "harm" has been used as suggested by the Government Office, as it is clearer than "adverse effect" but does not change the degree of protection provided. The inclusion of "it can be demonstrated that" has been added to clarify the developer's responsibilities. The phrase "likely to" was in the original text and was not the subject of a change. No further change is proposed.

In discussions with the Government Office, it was agreed it would not be practical to show nature conservation designations on the Proposals Map, in view of the large number and very small scale of many of them. The reason for this is set out in a change to the Plan at RD04.07. A consistent approach should be taken on how information on the different nature conservation designations may be found, and therefore details of local nature reserves is similarly available as separate information. New paragraph RD04.07 explains where information on each type of designation may be inspected in the Planning Department. As set out in new paragraph RD04.22, local nature reserves can have any nature conservation status.

**Change Proposed** – none.

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**Proposal C.10 and paragraph 4.24**

**Nature conservation: Other sites of nature conservation interest**

**Representations:**

**Support/resolved/withdrawn:**

**English Nature (251/5)**  
Support amendments  
**Change sought- none**

**Bishops Waltham Society (212/6)**  
Support changes RD04.23 – RD04.24.  
**Change sought – none.**

**Environment Agency (253/13), (253/15)**  
Resolved objection to paragraph 4.24 (253/17/DEPOS)  
**Change sought – none.**

**Objections:**

**Save Barton Farm Group (175/19), (175/20)**

The MDA at Barton Farm will destroy features of ecological interest, which paragraph 4.24 seeks to protect.

**Change sought - delete proposed development.**

**English Nature (251/9)**

There is no Proposal relating to protected species, and this does not accord with the advice in PPG9.

**Change sought - include a new Proposal on protected species (wording suggested).**

The Local Plan Review is required to be in general conformity with the Structure Plan. In order to conform to Structure Plan Policy H4, the Local Plan must identify a site for a reserve MDA at Winchester City (North). Whilst the objection expresses concerns about the outcome of the Structure Plan process, it is not for the Local Plan to challenge the strategic requirements.

The Local Plan does include a Proposal relating to protected species. Proposal C.10 has been amended to address this issue.

**Change Proposed – none.**

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**Issue: 4.11 (Deposit 4.26)**

**RD04.25-RD04.27**

**New Proposal (RD04.27) and**

**new paragraph (RD04.26)**

**Nature conservation: New and enhanced sites of nature conservation value**

**Representations:**

**Support/resolved/withdrawn:**

**Bishops Waltham Society (212/6)**  
Support changes RD04.25 – RD04.27.  
**Change sought – none.**

**Environment Agency (253/13), (253/15)**  
Resolved objection to policy omission on habitat creation (253/15/DEPOS)  
**Change sought – none.**

**The Wildlife Trust (330/7, 330/8, 330/9)**

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

The support / resolved objection is welcomed.

In identifying Winchester City (North) as a reserve MDA, the strategic process will have taken into account the importance of nature conservation issues, and the Local Plan sets out additional nature conservation requirements in Proposal NC.3 and at paragraphs RD12.86 and RD12.87. No further change is proposed.

**Change Proposed – none.**



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Supports the addition of RD04.25, RD04.26, and RD04.27.

**Change sought** – none.

**Objections:**

**Save Barton Farm Group (175/20)**

In relation to RD04.25 – RD04.27, the MDA at Barton Farm will destroy habitats and species of nature conservation interest.

**Change sought** - not specified.

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**Issue: 4.12 (Deposit 4.27)**  
**RD04.28 and RD04.29**  
**(Proposal C.11 and paragraph 4.28)**  
**Agricultural land quality**

**Representations:**

**Objections:**

**Save Barton Farm Group (175/21, 175/22)**

In relation to Barton Farm, the land is likely to be within the categories in paragraph 4.28, and no 'overriding need for development' has been proven, as required by the change to Proposal C.11. The building of an MDA there would have a devastating effect on Winchester and should not take place.

**Change sought** - delete proposed development at Winchester City (North).

**Mr and Mrs J P English (1401/1)**

The change to Proposal C.11 is meaningless if it can also allow 2,000 dwellings to be built on countryside at Winchester City (North).

**Change sought** - delete all references to Winchester City (North) as an MDA.

**J Hurrell (2248/1)**

Proposal C.11 states that there should be an overriding need for development and there should be little impact on the overall importance of land in the locality, but this is contravened by the proposal for a MDA at Winchester City (North).

**Change sought** - delete MDA at Winchester City (North).

**R Rous (2287/1)**

The change to Proposal C.11 states that there should be an overriding need for development. There is no demonstrable evidence to suggest that there is an overriding need to build on the Barton Farm site.

**Change sought** - designate housing areas attached to existing developed areas and delete MDA at Winchester City (North).

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

The Local Plan Review is required to be in general conformity with the Structure Plan. In order to conform to Structure Plan Policy H4, the Local Plan must identify a site for a reserve MDA at Winchester City (North). Whilst the objection expresses concerns about the outcome of the Structure Plan process, it is not for the Local Plan to challenge the strategic requirements. The strategic process will have taken into account the importance of agricultural land quality in identifying the area as a reserve MDA. The MDA would only be triggered if a need for it is identified by the strategic planning authorities.

The changes to Proposal C.11 and the related text are entirely consistent with the wording in PPG 7 (as set out in the March 2001 amendment) and with the wording in Draft PPS 7 (September 2003). It is entirely appropriate that a need should be demonstrated where higher quality agricultural land is affected. The changes to the Proposal and paragraph 4.28 use the phrase "sustainability considerations" as that is the wording used in the PPG and Draft PPS advice. The changes to paragraph 4.28 set out what these might cover precisely as listed in the PPG. These are very similar in the draft PPS although "maintaining viable communities" is added to the list. In both cases the list is not intended to be exhaustive, and other issues may be relevant, according to local circumstances. It is, however, considered that the Proposal and text should at present remain consistent with PPG 7, and no further change is proposed.

**Change Proposed** – none.

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**Kingfisher Housing Association  
(2312/15)**

The changes to Proposal C.11 do not reflect the advice in PPG7 as this refers to the need to consider the overall value of agricultural land, including location, accessibility and size. This should be given a high status and development should not be dependent on an 'over-riding need' having to be established.  
**Change sought** - amend wording to reflect above objection.

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**Issue: 4.13 (Deposit 4.30)**  
**RD04.31**  
**Proposal C.14**  
**Fish farms and water areas**

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

The support is welcomed.

***Change Proposed – none.***

**Representations:**

**Support/resolved/withdrawn:**

**Environment Agency (253/16)**  
Withdraw objection to Proposal C.14 (253/18/DEPOS).  
**Change sought**-none.

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**Issue: 4.14 (Deposit 4.31)**  
**RD04.32**  
**Proposal C.15**  
**Farm diversification**

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

The support is welcomed.

***Change Proposed – none.***

**Representations:**

**Support/resolved/withdrawn:**

**East Hampshire AONB Officer (2283/3)**  
Support addition of criterion (iii).  
**Change sought** – none.

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**Issue: 4.15 (Deposit 4.32)**  
**RD04.33 – RD04.35**  
**Proposal C.16 and paragraphs**  
**4.42 and 4.47**  
**Re-use of non-residential**  
**buildings in the countryside**

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

The support is welcomed.

The changes to criterion (iv) of Proposal C.16 are entirely consistent with the wording and sentiment of the advice in PPG 7, and in Draft PPS 7 on Sustainable Development in Rural Areas, which will eventually replace the current PPG 7.

**Representations:**

Paragraph RD 04.42 is included in the Plan to indicate that, where rural buildings that have been converted to business use (under C.16) reach the end of their useful life, the local authority will assess whether the location is suitable for continued business use. A replacement building would only be considered where the location is considered appropriate. This is to provide for those circumstances and is entirely appropriate. It also accords with advice in PPG 7.

**Support/resolved/withdrawn:**

**East Hampshire AONB Officer 2283/4**  
Supports addition of criterion (vi).  
**Change sought** – none.

**Objections:**

**Bryan Jezeph Consultancy (373/1)**  
The changes to criterion (iv) of Proposal

It is a requirement of Proposal C.16 that buildings suitable for conversion should be of permanent and sound construction and should not require substantial rebuilding. The circumstances set out by respondent 475 would therefore not occur, as buildings would

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C.16 conflict with the principle that the planning system should not be used to control competition between commercial enterprises. It should not be necessary to consider the impact upon other commercial uses.

**Change sought** - not specified.

**Clients of Southern Planning Practice (475/2)**

RD04.33 and RD04.43 need to be reconciled. Outworn/unattractive buildings should not be converted and then re-considered years later under RD04.43. Proposal C.16 should be amended to allow redevelopment of smaller, more attractive better located buildings. This would accord with PPG 7 on larger agricultural buildings.

**Change sought** - amend Proposal C.16 or new Proposal RD04.43 accordingly.

**Twyford Parish Council (328/5)**

Changes in RD04.33 – RD04.35 will encourage change of use in larger buildings without safeguards, will diminish the relationship between change of use and local employment and will increase impacts on rural roads from changes of use of farm buildings to B2 and B8 uses. Large scale farms should be dealt with on a comprehensive basis. As amended, the Proposal is inconsistent with PPG 7 and omits safeguards.

**Change sought**- define 'large' in Proposal C.16.

have to be in good condition at the time that planning permission was granted. It would not be appropriate to allow redevelopment of rural buildings at the outset, as this would be inconsistent with Government advice in PPG 7 and the overall aim to find a new use for smaller attractive rural buildings.

The changes in RD04.33 – RD04.35 specifically indicate that large buildings are unlikely to be suitable for conversion. It is entirely appropriate that the re-use of such buildings should be discouraged, as they would provide large amounts of new employment floorspace. The tests in the criteria of the Proposal, particularly criteria (iv) and (vi), are also likely to mean that large individual buildings will prove unsuitable for conversion. This will also often be the case for complexes of rural buildings with a large aggregate floor area, although in certain circumstances, a proportion of the floorspace may be considered for re-use, where the complex is in a sustainable location. It would, however, be appropriate for the Plan to be amended to indicate how buildings in such complexes would be treated. This would also be consistent with advice in PPG 7 and Draft PPS 7.

The amount of conversion that would be appropriate would be dependent on such matters as the location of the complex, the sizes of individual buildings, their suitability for business re-use, the condition/ attractiveness of the buildings, and a traffic impact assessment. A change to the text is therefore recommended in this respect.

Proposal C.16 includes a criterion that the type of traffic generated should not harm the character of rural roads. If this criterion cannot be met by the type of use proposed, for example for B2 and B8 uses, then the proposal would not be considered acceptable. No change is considered necessary to reflect this.

**Change Proposed – New Paragraph following paragraph 4.47:**  
"Within larger complexes of rural buildings, it is unlikely that all of the complex will be suitable for re-use. If it is established that the complex is in a sustainable location for business use, proposals for re-use of any part of the complex should follow a comprehensive assessment of the whole complex, and should be able to demonstrate that the buildings proposed for re-use are the most suitable for employment use, and that the amount of business use proposed is sustainable. This should take account of such matters as levels of traffic generation, any buildings to be removed and the need for environmental improvements to the remainder of the site."

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**Issue: 4.16 (Deposit 4.33)**

**RD04.37 – RD04.43**

**New Proposal and new paragraphs**  
**Existing established businesses**

**Representations:**

**Support/resolved/withdrawn:**

**Bishop's Waltham Society (212/4)**

Support changes RD04.36 - RD04.43.  
**Change sought** – none.

**East Hampshire AONB Officer (2283/4)**

Support addition of criterion (vi) in RD04.33.

**City Council's response to representation**

The support is welcomed.

The support for the principle of the new Proposal is welcomed, but a number of respondents have concerns that parts of the text are unclear or over-restrictive.

It is suggested that the term "existing established businesses" should be defined in new paragraph RD04.38. It is not considered that this term needs further amplification, as it is clear from this that the business should be currently operating and not a former use that has been vacated.

It is considered entirely appropriate that new paragraph RD04.39 should require applicants to demonstrate that expansion could not take place in a nearby settlement, as this would be consistent with PPG 7 and draft PPS 7, and the Government's aim to concentrate most employment in existing towns and villages. It is also appropriate that it should be justified in relation to operational needs,

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**Change sought** – none.

**Objections:**

**Grove Farms (Hampshire) Ltd. (314/1)**

Support the principle of new Proposal RD04.43 but it is unclear and unnecessarily over-restrictive. The wording of paragraph RD4.39 is inconsistent with the first criterion (ii) of new Proposal RD04.43. It is also illogical as an extension is likely to increase floorspace. The new Proposal RD 4.43 also states that it is necessary to demonstrate an operational need for additional floorspace, however there are often other pressures for additional space.

**Change sought** - in the new Proposal, change wording of criterion (ii) to “no substantial increase in floorspace” and delete wording after “development”. Amend wording in the penultimate paragraph to allow other than operational needs.

**Twyford Parish Council (328/3)**

Support changes in RD04.37- 04.43 but they are too limited.

- There is confusion between text and Proposal as to whether it relates to employment buildings or businesses in the countryside.
- The Proposal should apply to rural buildings converted through Proposal C.16 as well as other existing businesses.
- The relationship with Proposal C.16 should be made clear. As it stands, it makes little sense to permit a building to be reconstructed to enable change of use only to perpetuate an unsatisfactory building.
- The Proposal should take into account the environmental benefits in the AONB and National Park, as required by criterion (iii).

**Changes sought**- not specified.

**Bryan Jzeph Consultancy (373/2), (373/3), (373/4), (373/5), (373/6)**

Existing established businesses are not defined.

- In RD 04.39, where expansion can be accommodated without harm to the countryside, it is unreasonable to require demonstration that it could not take place within a nearby settlement;
- RD04.40 appears to limit redevelopment to existing occupants of a site. This appears to ignore existing use rights, the provisions within Section 55 of the Act and the Use Classes Order, that seek to provide flexibility for firms to move between premises, and for premises to be available to new occupiers without the need for further planning permission.

as the benefits of expansion for the business have to be assessed against the impact on the surrounding countryside. No further change is therefore proposed.

The text in paragraph RD04.40 indicates in what circumstances redevelopment would be permitted, to meet the needs of existing operating businesses. It allows for alternative business uses to be accommodated within a redevelopment of an existing business, but it would not be appropriate to allow redevelopment of sites that have been vacated. It is entirely appropriate that the need for buildings to have outworn their useful life, and for significant environmental benefits to be achieved, should both be requirements of redevelopment schemes and not alternatives. Uses should be restricted to B1, B2 and B8 uses as other uses, such as sui generis uses, are unlikely to be acceptable in the countryside.

New paragraph RD04.41 seeks to prevent poorly located businesses from expanding or being replaced in the countryside, and this is entirely appropriate, given that some will be in very remote locations, or already causing harm to adjacent properties. To allow their expansion or redevelopment would increase the problems that already exist. No change is therefore proposed.

New paragraph RD04.42 has been included to provide for the circumstances where a converted rural building may have reached the end of its useful life. These circumstances should normally be rare and a substantial time after the original conversion, as the original building would have been in good condition at the time of the planning permission. It has to be accepted, however, that not all converted buildings would be appropriate for replacement if the building condition deteriorates beyond the point where it is difficult to operate the business. If a converted building is inappropriate for replacement, its future use, if any, would depend on its location. It is considered that “an appropriate location” is adequately explained in the requirements of the proposal and there are accepted survey methods for determining whether a building has reached “the end of its useful life”. It is not therefore accepted that the terms used are unclear.

New Proposal RD04.43 has been generally supported, but, similarly to the text, respondents consider that parts of it are unclear or over-restrictive. A number of respondents have misunderstood the intent of criterion (ii) and it is therefore accepted that it could be amended to clarify the wording. It is not intended to prevent any increase in floorspace or built form, but to indicate that, where an increase is permitted, it should not result in any increase in employment or traffic levels. A further change to the wording is therefore proposed.

It is argued that the new Proposal RD04.43 should also apply to Proposal C.16, to allow for redevelopment or expansion at the outset. This would be entirely inappropriate, as set out in the response to Issue 4.15.

It is argued the Proposal RD04.43 does not recognise the benefits of allowing such development in the AONB or National Park. The existence of a location with the AONB or the proposed National Park would not be sufficient to justify replacement or expansion of existing business uses, on grounds of improvement to the environment. There may be other sound reasons why such development should not be encouraged. All proposals in these locations need to be judged against the same set of criteria, and additionally those in Proposal C.7 and its requirements.

It is considered appropriate that Proposal RD04.43 should require no increase in employment levels as an increased level of business activity would generally have an unacceptable impact on the countryside, whether or not the location was close to a settlement. It is also consistent with Government advice that sites should be close

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- RD04.41 suggests that some businesses will not be allowed to expand or redevelop. This could prevent building improvements and ignores the rights of existing businesses.
- RD04.42 ignores the use rights of existing businesses, and may also discourage investment in new building. The criteria 'appropriately located' and 'end of its useful life' are subjective.
- The new Proposal RD04.43 is unclear. It is unacceptable that other business sites with lawful use rights may not be permitted to expand or redevelop. Sites close to settlements are best placed to assist rural employment, and therefore an increase in employment should be permitted. The requirement that buildings should have outworn their useful life will encourage neglect and discourage the provision of more efficient buildings.

**Changes sought - not specified.**

**Clients of Southern Planning Practice (475/4), G Arturi (476/1), GH Lliftrucks (493/1), J Judd (501/1), M Madgewick (504/1), Mitchell Properties (506/1), J Searle (2294/1), G Moyse (2295/1)**

Comments on a number of paragraphs and the Proposal:

- in RD04.38, support principle of re-developing business sites in the countryside, but it is too restrictive. Development of any business site, not just existing businesses should be permitted. PPG 7 states that it may not be possible to redevelop existing sites as the owner may not have the funds to achieve it. The Proposal as drafted will stifle redevelopment opportunities and perpetuate poor buildings.
- in RD04.39, the requirement for businesses to show there are no other sites suitable in nearby settlements is excessive and contrary to advice in PPG 7. It will stifle redevelopment opportunities.
- in RD04.40, it should not be necessary to meet both tests for replacement buildings, as it would be inconsistent with PPG advice. They should be allowed if they are outworn or if there would be a net environmental gain. Also, the Proposal should not be restricted to B1, B2 and B8 uses.
- in RD04.42, there should be an opportunity to redevelop the site for a use more appropriate to its location, otherwise buildings which may be inappropriate to the character of the countryside will remain.
- In new Proposal RD04.43 changes

to settlements (defined in Proposals H.2 and H.3)

Within new Proposal RD04.43, it is entirely appropriate that a comprehensive plan should set out how the natural features of the site are to be managed, as this would require an amplification of how the trees, hedges, watercourses etc are to be managed in relation to the business use. Management measures are entirely different to the requirements of Proposal DP.3 and it entirely appropriate to include them. No change is therefore proposed in this respect.

The new Proposal RD04.43 is entirely consistent with PPG 3, which directs development in the first instance to brownfield sites within towns and villages. The Proposal is also in accordance with PPG 7 and Draft PPS 7 which require local authorities to allow for the reasonable expansion of businesses in the countryside. It would not be appropriate to amend the Proposal to allow for alternative uses, as it is designed to meet the needs of countryside businesses.

It is not considered necessary to amend Proposal 04.43 to make it a requirement that redevelopment should not bring about a significant increase in noise. Development proposals already need to accord with Proposal DP.3, and therefore would consider any harmful impact on adjoining uses, including noise.

It is also noted that there are two sets of criteria in the Proposal which are similarly referenced (i) and (ii). It is therefore proposed that, in the final section of the Proposal, the criteria for redevelopment proposals should be changed to (a) and (b).

**Change Proposed – New Proposal RD04.43:**

..(ii) there will be no increase in employment or traffic levels as a result of any increase in floorspace or built development ~~resulting in increased employment or traffic levels;~~

....

...(i) (a) the buildings have outworn their useful life;

(ii) (b) the proposed buildings achieve a more efficient use of the site.

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will be necessary to reflect above objections (wording changes suggested). The words 'natural features are to be managed' are unnecessary as the point is covered by Proposal DP.3.

**Changes sought** – *specific wording changes to new paragraphs RD 04.39, 04.40 and new Proposal RD04.43.*

**BT Plc (2108/2)**

The new Proposal RD04.43 seeks to restrict expansion. To allow consideration of viable alternative uses for telecommunications uses, it should be amended. PPG3 advises that maximising the re-use of previously-developed land and re-use of existing buildings should be encouraged.

**Change sought** - *add new criterion (iv) specifically for public utility buildings (wording suggested).*

**South Coast Fencing (Manufacturing) Ltd. (2207/1)**

In RD 04.42, the requirement that sites should be close to settlements listed in H.2 and H.3 is too restrictive. Other sites may be equally suitable.

**Change sought** - *in new paragraph RD04.43, omit 'defined in proposals H.2 and H.3'.*

**East Hampshire AONB Officer (2283/5)**

Support RD04.43 but it should also ensure extension or re-development does not bring a significant increase in noise.

**Change sought**- *not specified.*

**Hawthorne Kamm (374/4)**

The new Proposal RD04.43 is too inflexible, particularly criterion (ii) which presumes all redevelopment or extensions will be detrimental. It is difficult to understand how extensions may be permitted, without increasing the amount of floorspace. This also contradicts criterion (iii) which says it may be possible to have additional floorspace. Increased employment may not cause an increase in motorised traffic, as many rural locations are able to support other modes.

**Change sought** - *reword to ensure rural businesses can expand where appropriate. Amend criterion (ii) to say no 'substantial' increase in floor space.*

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**Issue: 4.17 (Deposit 4.38)**  
**RD04.44**  
**Paragraph 4.66**  
**Extension/replacement of dwellings**

**Representation:**

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

It is entirely appropriate that the local authority should seek to control the size extensions to dwellings in the countryside, and to maintain those dwellings of more modest proportions. Paragraph 4.70 already indicates that dwellings of 120m<sup>2</sup> or less are considered to represent those dwellings of modest size, and that extensions to such dwellings should be restricted to a maximum 25% aggregate increase. This would apply to dwellings with any number of bedrooms.

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**Objection:**

**Bewley Homes (386/4) Hawthorne Kamm Ltd (374/5)**

The change in paragraph 4.66 is too inflexible. It fails to recognise that 2 bedroom properties may not be small. It also restricts the needs of those needing to enlarge their living accommodation. Redevelopment could also be used to replace single dwellings with a number of small units. 'Small dwellings' and 'more affordable' are not defined.

**Change sought** - re-word to encourage retention, to allow more flexibility and to define 'more affordable' and 'small'.

Paragraph 4.66 indicates that the local authority is particularly concerned to retain dwellings of 1 or 2 bedrooms, which are in short supply. It is not considered necessary to define "small" or "more affordable" as it is already clear that they would be of 1 or 2 bedrooms and probably substantially smaller than 120m<sup>2</sup>. It is unlikely that larger 2 bedroom properties would exceed 120m<sup>2</sup>, and therefore they would be subject to the 25% maximum increase.

It is, however, accepted that there is some repetition in the text at paragraphs 4.66 and 4.70. It is therefore proposed that paragraph 4.70 should be deleted, but that paragraph 4.66 should be amended to combine the content of both paragraphs. This should clarify the approach to the extension or replacement of those dwellings in the countryside that are considered to be of more modest size. A change to paragraph 4.66 is therefore proposed.

It is not, however, considered that there should be increased flexibility, either to allow larger extensions to meet family needs, or to allow large dwellings to be replaced with a number of small units. Both options would have an unacceptable affect on the countryside and no change is proposed in this respect.

**Change Proposed – to paragraph 4.66:**

There is a need for a mix of dwelling sizes and types in the countryside, to retain variety in the housing stock. There is currently an oversupply of large detached dwellings in the countryside, and the Local Authority will therefore seek to retain and restrict increases in the size of existing dwellings of less than 120m<sup>2</sup> floor area. This would apply to all proposals for replacements or extensions, which will normally be limited to no more than 25% of the existing, whatever the number of bedrooms. The Local Authority will, however, be particularly concerned to retain the replacement or extension of existing dwellings will be restricted to maintain the supply of dwelling sizes and types in the countryside. This will ensure that some small dwellings, particularly those the smaller more affordable dwellings of 1 or 2 bedrooms, that are in short supply throughout the District, are retained to meet local needs. Any acceptable extension or replacement should reflect the character and design of the original dwelling, and should not result in a dwelling that is disproportionately larger than the one it is extending or replacing.

**Change Proposed – to paragraph 4.70:**

Delete paragraph.

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**Issue: 4.18 (Deposit 4.38)**  
**RD04.45 - RD04.47**  
**Proposal C.23 and new**  
**paragraphs RD04.45 and 04.46**  
**Conversions and changes of**  
**use**

**Representations:**

**Support/resolved/withdrawn:**

**H C R Stanley (958/1)**  
Withdraw objection to Proposal C.23 (958/1/DEPOS).  
**Change sought** – none.

**Objections:**

**East Hampshire AONB Officer (2283/6)**  
Suggest additional wording to new paragraph RD04.45 to clarify that

**City Council's response to representation**

The support is welcomed.

The criteria of Proposal C.23 and RD04.47 establish that the building should be of high quality and suitable for conversion without substantial works. It should therefore be a building worthy of retention, and therefore a new use should be found. Residential use is likely to be more appropriate in remote locations, as it would generate less activity, and this is likely to be demonstrated by the application of criterion (iii). No change is therefore proposed.

The reasons why a building is "worthy of retention" and the quality of the design and construction is likely to vary with each individual building. It is appropriate to require an applicant to demonstrate that this applies to the building proposed for conversion. No further change is therefore proposed to the text or the Proposal.

Proposal C.23 is fully consistent with PPG 3, PPG 7 and Draft PPS 7. PPG 3 advises that housing development should be directed in the first instance to brownfield sites within urban areas. It is a key aim of PPG 7 and Draft PPS 7 that housing development in the countryside should be strictly controlled. This Proposal is entirely consistent with

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conversion or re-use may not be appropriate in remote locations.

**Change sought** – *additional wording suggested.*

**Bryan Jezeph Consultancy (373/7), (373/8)**

RD04.46 requires buildings to be 'worthy of retention' and of 'high quality'. These are not defined and will require subjective judgement. This is also reflected in the changes to Proposal C.23, which are imprecise and difficult to interpret. Good buildings in areas unsuitable for business use may be left with no effective role or use, contrary to PPG7.

**Change sought** - *not specified.*

**Hampshire County Council, Estates Practice (1434/2)**

Proposal C.23 and new paragraphs RD04.45 and 04.46 are inconsistent with PPG 3 which encourages the re-use of vacant land for residential purposes. The need to retain employment uses should be balanced against the equally pressing need to provide housing. The presumption against residential conversions would restrict the re-use of surplus County Council buildings and reduce finance for re-investment in essential services.

**Changes sought** – *delete Proposal C.23 and new paragraphs RD04.45 and 04.46.*

**Hawthorne Kamm (374/6)**

In Proposal C.23, 'long-term' business re-use is not defined. It should allow for expansion of rural businesses and proposals should accord with the remaining objectives of the Proposal.

**Change sought** – *reword Proposal to reflect this.*

additional advice in PPG 7 and Draft PPS 7, that where buildings are suitable for conversion, an employment use should be explored in the first instance. Only when residential use is the only option to retain the building should it be considered. More housing in the countryside would be in direct conflict with Government advice, and it would not be appropriate to encourage it to satisfy the requirements of the County Council as one individual landowner.

It is not considered necessary to define the term "long term business use" as the circumstances may vary with each building. The important point is that the building should have been marketed to attract an occupier willing to use the building over a reasonable period of time and not on a short-term basis. The last part of respondent 2291's objection is unclear, as it is seeking amendment of the Proposal to allow for business expansion, whereas the Proposal sets out in what circumstances residential use would be proposed. No change is therefore proposed to reflect this.

**Change Proposed** – *none.*

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**Issue: 4.19 (Deposit 4.42)**

**RD04.52**

**Proposal C.26**

**Representation:**

**Support/resolved/withdrawn:**

**Hampshire County Council, Estates Practice (1432/1)**

Partially resolved by new paragraph RD04.49 (1432/ /DEPOS).

**Change sought** – *none.*

**GOSE (261/19)**

Support the changes in RD04.52.

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

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

The resolved part of the objection is welcomed.

**Change Proposed** – *none.*

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**Issue: 4.20 (Deposit 15.6)**

**RDAPP2.00**

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



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**Appendix 2 – General**

**Representations:**

**Objections:**

**Bishop’s Waltham Society (212/10) (212/8)**

Grave omissions and conflicts in the material of Appendix 2. Inability to decipher whether or not the LCAs cover settlements and the countryside or just the countryside. Conflicting and duplicated criteria between C.6 and all the Landscape Character Assessments in Appendix 2.

**Change sought** – redraft Proposal C.6, Diagrams 1 and 2 and Appendix 2 or delete C.6 and Appendix 2 (preferred).

**George Wimpey UK Ltd (2297/11) (2297/12) (2297/13)**

Object to the inclusion of land at Albany Farm in the Durley Claylands LCA as it is better related to the urban area. Also object to the lack of detailed maps outlining the revised character areas within the Local Plan.

**Change sought** - define LCAs as in the Deposit Plan. Amend Durley Claylands LCA to exclude land at Albany Farm.

**Redrow Homes (Southern Ltd) (474/32)**

Object to the inclusion of land off Worthy Road in the Upper Itchen Valley Character Area. The land does not display any of the characteristics of the LCA and is better related to the built up area of Winchester.

**Change sought** – define the LCAs as in the Deposit Plan. Amend Upper Itchen Valley LCA to exclude land adjacent to Francis Gardens.

Government advice on the need for policies to be based on a proper assessment of the character of the built and natural environment is set out in PPG 1, PPG 7 and Policy E6 of the Hampshire County Structure Plan. The Landscape Character Assessment uses a systematic approach in line with the Countryside Agency and Scottish Natural Heritage guidance (1999,2002). Landscape Character Areas may include settlements that are not subject to Proposals H.2 or H.3 within them. The Landscape Strategies apply to the areas outside settlements, i.e. those areas which are subject to countryside policies. The Built Form Strategies apply to settlements, including those which have their own defined settlement boundary or development frontage, and those which are subject to countryside policies.

Proposal C.6 relates to landscape character and the impact of development on its relevant Key Characteristics. Views may or may not be a key characteristic of the character area. It is accepted that the word 'intrinsic', may cause some confusion and a proposed change is recommended to overcome this.

Boundaries are required around Landscape Types and Landscape Character Areas, although it is acknowledged that in reality the landscape is a continuum and character does not in general change as abruptly as a boundary on a map may suggest. An explanation note to this effect will be included within Chapter Four of the Landscape Character Assessment.

It is not considered that there is duplication of Proposals DP.5, C.6, C.8 to C.10, and HE.3 to HE.5.

It is agreed that the word 'management' should be omitted from Paragraph 1 RDAPP2.01. A change is proposed to reflect this.

The character areas have been defined in accordance with the Countryside Agency and Scottish Natural Heritage Landscape Character Assessment Guidance (2002), as unique individual geographical areas, which should be identified, mapped and described.

The land at Albany Farm, Bishops Waltham, and adjacent to Francis Gardens, Winchester, does not fall within the Local Plan's settlement boundaries. They are therefore subject to countryside policies, and are appropriately included within Landscape Character Areas. The land at Albany Farm, Bishops Waltham, falls within the Mixed Farmland and Woodland Landscape Type, which is described in detail in the Landscape Character Assessment, and therefore forms part of the Durley Claylands Landscape Character Area. The land adjacent to Francis Gardens, Winchester, falls within the River Valley Side Landscape Type, which is described in detail in the Landscape Character Assessment, and therefore forms part of the Upper Itchen Valley Landscape Character Area. No further changes are proposed.

Diagram 2, relating to landscape types, is background information, and is referred to in more detail within the Landscape Character Assessment. It does not therefore need to be included in the Local Plan. It is acknowledged that the Character Area boundaries shown on Diagram 3 in Appendix 2 are not as clear as the detailed maps within the Landscape Character Assessment. Proposed changes are therefore recommended to delete Diagram 2, and to clarify the boundaries of the Landscape Character Areas, by reproducing Diagram 3 to a larger scale and on an Ordnance Survey base. Diagram 3 should be re-titled Diagram 2.

**Change Proposed – Appendix 2: Introduction**

*Amend second sentence of first paragraph to read:*

*“...This divides the District into a series of ‘Landscape Character Areas’, each with their own Key Characteristics, Landscape Management and Built Form Strategies.....”.*

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***Change Proposed – Proposal C.6***

*Amend first sentence to read:*

*“Development which fails to respect the ~~intrinsic~~ character of the landscape....”*

***Change Proposed – Diagram 2: Landscape Types (back of Map 7: Curdridge)***

*Delete.*

***Change Proposed – Diagram 3: Landscape Character Areas (back of Map 7: Curdridge)***

*Amend to show on an Ordnance Survey base and at a larger scale. Retitle as Diagram 2.*

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**Issue: 4.21 (Deposit 15.6)**

**RDAPP2.04**

**Representation:**

**Support/resolved/withdrawn:**

**Environment Agency (253/27)**

Support the changes made and withdraw objection made on the Deposit Plan (253/38/DEPOS).

***Change sought – none.***

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

The support is welcomed.

***Change Proposed – none.***

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**Issue: 4.22 (Deposit 15.6)**

**RDAPP2.08**

**Wonston Downs LCA**

**Representations:**

**Support/resolved/withdrawn:**

**Roger Secker (2275/4)**

Supports the changes made to Wonston Downs Landscape Character Area.

***Change sought – none.***

**Objection:**

**Save Barton Farm Group (175/43)**

Object to the Winchester City North MDA and the inclusion of Barton Farm. The proposed MDA will destroy the landscape and in doing so contradicts the Plan and its policies to preserve, enhance and nurture the landscape of Winchester.

***Change sought: provide consistency through the Local Plan and protect Winchester's landscape setting against damage to its special character.***

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

The support is welcomed.

The Local Plan Review is required to be in general conformity with the Structure Plan, and, in order to conform to Structure Plan Policy H4, the Local Plan must identify a site for a reserve MDA at Winchester City (North). Whilst the objection expresses concerns about the outcome of the Structure Plan process, it is not for the Local Plan to challenge the strategic requirements.

The strategic process will have taken into account the importance of landscape issues, and the Local Plan sets out additional landscape requirements in Proposal NC.3 and at paragraphs RD12.85 and RD12.86. No further change is proposed.

***Change Proposed – none.***

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**Issue: 4.23 (Deposit 15.6)**

**RDAPP2.09**

**Dever Valley LCA**

**Representations:**

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

The support is welcomed.

***Change Proposed – none.***

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**Support/resolved/withdrawn:**

**Environment Agency (253/28)**

Support the changes made and withdraw objection made on the Deposit Plan (253/39/DEPOS).

**Change sought** – none.

**Environment Agency (253/29)**

Support the changes made and withdraw objection made on the Deposit Plan (253/41/DEPOS).

**Change sought** – none.

**Environment Agency (253/31)**

Support the changes made and withdraw objection made on the Deposit Plan (253/43/DEPOS).

**Change sought** – none.

**Issue: 4.24 (Deposit 15.6)**

**RDAPP2.19**

**South Winchester Downs LCA**

**Representation:**

**Objection:**

**Bishop Waltham Society (212/12)**

The South Winchester Downs LCA should be extended to include other like landscapes surrounding the LCA.

**Change sought** – if Proposal C.6 and Appendix 2 are not deleted, incorporate Diagram 2 into the Proposals Map and add Northbrook and the Moors to LCA 15 (South Winchester Downs).

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

Northbrook Vineyard is shown as part of the Chalk and Clay Farmland landscape type and it does come within Character Area 15, The South Winchester Downs.

The land to the northern edge of the Moors SSSI has been defined as 'Pasture on Clay' Landscape Type and comes under the Durley Claylands Landscape Character Area (No.23). In terms of geology, the area lies partly over Reading Beds (mottled clay with sand) and partly over Upper Chalk (with thin clayey flinty soil). The characterisation process is an analysis of landform, soils, vegetation, land use and enclosure/field patterns, and field survey in addition to geology. In the Landscape Architect's opinion, the area conveys the characteristics of Pasture on Clay Landscape Type, and these are set out in detail within the Landscape Character Assessment.

It is accepted that, without a key, Diagram 2 is difficult to read. It is background information already included in the Landscape Character Assessment, and does not need to be included in the Local Plan. It is therefore recommended that it is deleted.

***Change Proposed – Appendix 2: Diagram 2 (back of Map 7: Curdridge)***

*Delete Diagram 2 showing Landscape Types.*

**Issue: 4.25 (Deposit 15.6)**

**RDAPP2.20**

**Upper Meon Valley LCA**

**Representations:**

**Support/resolved/withdrawn:**

**Environment Agency (253/30)**

Support the changes made and withdraw objection made on the Deposit Plan (253/42/DEPOS).

**Change sought** – none.

**Environment Agency (253/31)**

Support the changes made and withdraw objection made on the Deposit Plan (253/43/DEPOS).

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

The support is welcomed.

**Change Proposed** – none.

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

*Change sought – none.*

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**Issue: 4.26 (Deposit 15.6)**

**RDAPP2.25**

**Portsdown Hill/Durley**

**Claylands LCAs**

**Representations:**

**Objections:**

**Bishops Waltham Society (212/11)**

The Local Plan should include the Hamble Valley LCA that extends to the edges of LCAs 21 & 23 and is in the Eastleigh Borough Local Plan. Both Councils should be working together and not have different views on this issue.

**Change sought – include the Hamble Valley LCA, as in the Eastleigh Borough Local Plan (if the deletion of C.6 and Appendix 2 is unsuccessful).**

**Southwick Estate (2330)**

In Appendix 2, Area 12, Portsdown Hill, should be amended to state that there are Glacii associated with the Palmerston Forts

**Change sought – not specified.**

**Charles Planning Associates (2331)**

The Landscape Assessment should not be relied upon as a means to impose inappropriate restrictions on development proposals, which otherwise accord with the objectives of Development Plan policy.

**Change sought – not specified.**

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

The Landscape Assessment of Eastleigh Borough describes the landscape of the Hamble Valley (Area 19). Above the point where the Curbridge stream joins the river, the river "remains tidal as far as Botley Mill but narrows very considerably and is dominated by the adjacent landscape character." The upper reaches of this river, where they lie within Winchester District, becomes less significant and more a characteristic of the Mixed Farmland and Woodland Landscape Type (similar for example to the River Wallington within the Forest of Bere Lowlands), where the landscape is traversed by a network of tributaries. No change further change is therefore proposed.

It is accepted that, within the key characteristics of Section 19 on the Portsdown Hill Landscape Character Area, the section relating to the Palmerston forts does not read clearly. A change is therefore recommended in this respect.

The purpose of the Landscape Character Assessment is to identify what gives the locality its own sense of place and identify which conditions should be set for any new development and change. It is not a tool designed to resist changes that may influence the landscape. Its role is to help ensure that change and development does not undermine whatever is characteristic of a particular landscape, and to allow ways of improving the character of a place to be considered. No change is therefore considered necessary.

***Change Proposed – Appendix 2: 19. Portsdown Hill Landscape Character Area***

***Amend 8<sup>th</sup> bullet point of Key Characteristics section to read:***

***"The Victorian Palmerston forts, Fort Nelson and Fort Southwick, together with Fort Widley (within Portsmouth City boundary), form an important series of historic landmarks along the hilltop, ~~Massive earthworks (glacis, with manmade, virtually treeless slopes to the north (Glacii).~~***