

## **1.0 Chapter 13 – Inclusive Society**

### **Introduction**

- 1.1 This section of the Core Strategy sets out the approach to services and housing provision to meet people's needs, and concentrates particularly on housing provision (including gypsies and travellers) and affordable housing. It is one of the longest 'Core Policies' chapters, containing 8 Core Policies.
- 1.2 Policy CP.15 deals with the quantity of housing proposed in the District and was based on the Secretary of State's Proposed Changes to the South East Plan. The South East Plan has now been adopted and forms part of the statutory development plan. Several respondents referred to the need to update the figures to reflect the adopted SE Plan and this is accepted. Others challenged whether the SE Plan's requirements should be followed, but current guidance indicates that compliance with the regional spatial strategy is a 'legal requirement' for the Core Strategy. Failure of the Core Strategy to plan for these requirements would, therefore, prevent it from being examined or adopted as a Development Plan Document.
- 1.3 Many respondents have questioned various components of the expected land supply, in particular the 'small sites allowance', the contribution of Strategic Housing Land Availability Assessment (SHLAA) sites, and the number of 'non-strategic' allocations which may be needed in the Development Management and Allocations DPD. The Planning Inspectorate advisory note is clear that the small sites allowance would be regarded as a 'windfall' allowance, which PPS3 advises should not be taken the basis for housing supply. The Leader of the Council has written to the relevant Government Minister to query the applicability of this advice in Winchester, but the Government's response maintains the view that specific, deliverable sites need to be identified rather than relying on unidentified windfall sites.
- 1.4 The SHLAA was published for consultation separately from the Core Strategy and a report on the responses and recommended changes was presented to Cabinet in October 2009 (see report CAB1901). Cabinet did not wish to endorse the further work until potential greenfield sites had been assessed and reported back. That work is in progress and the SHLAA will be finalised prior to the publication of the next stage of the Core Strategy, enabling its results to be taken into account. These will influence the amount of greenfield land that needs to be provided, either through the Core Strategy's strategic allocations, or through smaller-scale allocations in the Development Management and Allocations DPD. It will, therefore, be possible to update the sources of land supply (Table 3 of the Preferred Option document) and Policy CP.15 as necessary to ensure the South East Plan's requirements are met, in advance of the next stage of the Core Strategy being finalised.

- 1.5 Policy CP16 sets out the Council's overall housing priorities, ensuring a wide range of needs are met while prioritising affordable housing provision (other policies making clear that this means affordable provision within an overall housing supply where market housing is likely to dominate for reasons primarily of economics). Some respondents considered Policy CP16 could be better expressed as an objective rather than a policy. Others thought specific reference should be made to specific populations, e.g. students and older persons (particularly in terms of extra care needs). Comments were also made on the priority given to affordable housing and the need to refer to, and ability to, deliver Lifetime Homes.
- 1.6 Policy CP17 sets out the approach to overall housing mix, placing greater emphasis on family houses. Despite some respondents suggesting to the contrary, the approach is intended to be flexible in order to respond to changing needs, demands and economic circumstances. It is considered important for the policy to give some priority to the provision of modest (2 and 3 bed) family houses while not being overly prescriptive.
- 1.7 Policy CP18 sets out the Council's proposed affordable housing policies and targets (that take account of housing need, the economics of development, South East Plan targets and local viability studies). The 35% target is an overall target from all supply, including from 100% affordable housing sites but also taking account of the fact that current Local Plan policy (which continues to apply for the time being) does not require all sites to contribute affordable housing. The 35% figure is not, therefore, a 'quota' (which is dealt with by Policy CP.19). Some respondents have said that targets should be higher, however the targets are considered to be challenging but realistic, taking account of past supply during the plan period and development economics. Wickham Parish Council, and others, have made representations that local circumstances should mean an alternative approach is taken for that Parish.
- 1.8 Policy CP19 sets out affordable requirements for quota sites, that is market housing sites where a proportion of development is set aside as affordable housing. The detailed requirements in CP.16/18 will also apply to such sites. Affordable housing thresholds are removed so an affordable housing contribution is required from all sites, though on smaller sites a financial contribution in lieu can be acceptable. While economic circumstances have changed during the evolution of the Core Strategy the provision of affordable housing quota sites remains an important means of delivering new homes. Priority is again attached to homes for social rent (though some respondents suggest the target too high). Other respondents suggest that the 40% affordable homes target is too high, others too low. The target is insufficient to meet need, however (as evidenced by the viability studies) a higher target would render sites unviable. A further viability study on small sites carried out by the Council since the Preferred Options were published indicates that a financial contribution should usually be taken on sites of 1-4 homes. Again, comments relating to Wickham were received that reflect those covered in relation on CP.18 (more details are provided below).

- 1.9 Policy CP20 aims to increase the supply of affordable homes in rural areas (on sites not normally suitable for housing development), allowing for 'traditional' rural exception scheme development, along with enabling development in Level 4 settlements and the allocation of sites for affordable housing. This would support the delivery of the target of 600 'local connection homes' in Policy CP18. While some respondents welcomed the attention given to rural housing, some felt that enabling development should be extended to other settlement levels. Others expressed concern about the conformity with national and regional policy of the proposal for enabling development on windfall sites.
- 1.10 Policy CP21 sets out general criteria in relation to sites for Gypsies, Travellers and Travelling Showpeople. At the time of drafting the Core Strategy, the Partial Review of the South East Plan, which is considering pitch allocations at a District level, was underway. That process has moved on, with the Examination in Public taking place recently, but the Panel Report has yet to be published and the Partial Review adopted.
- 1.11 There were a limited number of comments on this Policy, and a mix of comments in support and objection. The main issues of concern were whether the Policy was sufficiently detailed in various respects.
- 1.12 The purpose of Policy CP22 is to ensure that local facilities are retained given the rural nature of the District and the need to reduce unnecessary trips by car. It is intended that the Policy is applied to a range of both social and community facilities and it is this 'list' that a number of the respondents comment on.

## **2 Conclusion and Recommended Approaches to Policies CP15 – CP22**

- 2.1 There is legal requirement currently for the Core Strategy to generally accord with the provisions of the Regional Spatial Strategy (the South East Plan). Policy CP15 must, therefore, give a commitment to meet those requirements and the Core Strategy needs to show how the required housing will be delivered. Policy CP15 and the accompanying Table 3 should be updated to do this. Work also needs to continue to publish the SHLAA (and to update it regularly), as this is a key element of the evidence base and will help to determine the level of brownfield/greenfield development needed.
- 2.2 Some respondents considered Policy CP16 could be better expressed as an objective rather than a policy and this can be taken on board. There is benefit in combining this with an amended CP.18 to create a consolidated set of housing policy objectives. Others thought specific reference should be made to particular populations, e.g. students and older persons (particularly in terms of extra care needs). While it would not be advisable to try to draw up an exclusive list of populations whose needs and demands could be addressed under CP16, it would be reasonable to refer to these specific groups in the explanatory text of this section and reword policies elsewhere in the Core Strategy. In terms of

Lifetime Homes it is accepted that this is one way, albeit the Government's currently preferred way, of delivering adaptable, flexible housing, and the policy should be reworded to reflect this.

- 2.3 Changes are proposed to Policy CP17 to remove uncertainty about a lack of a flexible approach, to refer to affordable and other specific types of housing within an overall approach of meeting a wide range of community needs and to development economics. It is also proposed that reference to Table 5 in the policy itself is deleted to avoid any misinterpretation that the figures in that table are prescriptive, although the Table should be retained and referred to in the explanatory text.
- 2.4 As with CP16, it is considered policy CP18 would be better expressed as a set of objectives, and combined with CP16. Minor amendments are proposed to pick up on responses, including ensuring that local circumstances are taken into account in decision making.
- 2.5 The Council's Small Sites Viability Study allows more clarity to be given to the definition of small sites (from which a financial contribution may be accepted in lieu of on-site affordable housing provision) in CP19 and it is proposed these be categorised as sites of 1-4 dwellings. It is proposed emphasis be given to the economics of provision in this policy.
- 2.6 The recent research into the likely success of the Policy CP20 is ongoing, but suggests that the policy needs substantial amendment. Since the publication of the Preferred Options the Council has commissioned research into the potential of this policy to deliver additional affordable housing. Early findings suggest that in its current form the policy is likely to be counter-productive by compromising the development of affordable housing on rural exception land related to higher order settlements. The policy has also been the subject of an objection from GOSE. It may be that an approach that allows enabling development on sites which have particular viability issues would be more appropriate, although this is unlikely to need a Core Strategy policy. The work is suggesting that the allocation of sites for affordable housing only (through the Development Management and Allocations DPD), along with the more traditional rural exception site approach, would be a more fruitful approach. Such sites would need to be on land where other residential development would not be permitted and would be likely to involve the release of greenfield sites. The Council has recently been awarded CLG funding to undertake further work around settlement hierarchies and would help define the scale, nature and form of development which would be most appropriate for the various rural settlements. This work will help support the detailed revision of this policy.
- 2.7 Given that the Examination in Public into the South East Plan's 'Partial Review' of Gypsy and Traveller Accommodation needs has only recently been held, it may be some months before the Review is adopted, resulting in final allocations for new pitch requirements for individual authorities. If this is done in time to inform the next stage of the Core Strategy, the Policy and explanatory text should be amended to refer to the District's pitch allocation and to update the situation

regarding the Partial Review. In addition, a minor alteration to Policy CP21's explanatory text is needed, to clarify the distinctive site requirements of Travelling Showpeople.

- 2.8 With regard to the policy to retain local facilities this needs to be updated and reviewed to ensure that it follows the PINS advice in terms of 'what, where, when and how'. New provision of local facilities is not a strategic issue and will be covered in the development management and allocations dpd rather than the Core Strategy.

### **Recommended Approach:**

#### **Policy CP15**

1. Update Policy CP15 and its explanatory text to reflect the housing requirements of the approved South East Plan, or any changes which may be made prior to the publication of the next stage of the Core Strategy, and to clarify the coverage of the Housing Market Assessment.
2. Publish work on the SHLAA, including removing the 'broad locations' and small sites allowance from the SHLAA, and adjust the Core Strategy accordingly. Update the 'other greenfield allocations' line in Table 3 of the Core Strategy in the light of the revised SHLAA and housing requirements at the time.
3. Ensure that references to development in the rural settlements (including Table 3) are consistent with the revised Policy MTRA2 and clarify that the 'urban areas' are at the top of the 'settlement hierarchy'.
4. Clarify and update references to Local Reserve Sites as necessary, but continue to state that they would be reviewed in the Development Management and Allocations DPD (if not already released), along with other non-strategic allocations.
5. Reconsider whether references to the previous Structure Plan requirements in paragraph 13.14 remain necessary.

#### **Policy CP16**

1. Delete Policy CP16 and instead express issues as objectives (combined with Policy CP18) that encompasses the principles set out in the currently proposed policies. Include reference in text to refer to needs of particular

populations such as older people and students. The objective should refer to ‘...flexible, adaptable accommodation, such as Lifetime Homes’.

2. Incorporate reference to extra care housing in Strategic Site Allocation Policies.
3. Incorporate reference to student housing in policy WT1 (first bullet) – Strategy for Winchester Town.

### **Policy CP17**

1. Delete reference to Table 5 in policy CP17 and refer to it in explanatory text indicating that this gives guidance on current and future demand.
2. Amend Policy CP17 and explanatory text to refer to providing meeting a wide range of community needs (including those referred to in the objective that will replace CP.16), maximising affordable housing, in particular family houses for social rent (having regard to sustainability, housing need and the economics of development), providing flexible, adaptable homes, such as Lifetime Homes and allowing for specialised accommodation.

### **Policy CP18**

1. Delete policy and instead express issues as objectives (combined with Policy CP16) that encompasses the principles set out in the currently proposed policy.
2. Make clear that 35% is an overall target, not a quota for market sites.
3. Amend bullet *b* to include reference to the proportion of social rented housing to be approximately 70% (with the remainder to be intermediate affordable housing)
4. Amend bullet *d* to include reference to extra care, flexible adaptable accommodation, such as Lifetime Homes, and those with disabilities and support needs.
5. Amend bullet *f* to refer to *other relevant local circumstances*.
6. Refer to mixed and balanced communities and to cross reference to CP20.

7. Review the Local Connection target in the light of the viability study and the CLG sponsored Rural Masterplanning project.
- 8 Amend text to make clear affordable housing should be available in perpetuity.

### **Policy CP19**

1. Policy CP19 to be amended to reflect the findings of the Small Sites Viability Study to make clear that a financial contribution would be an appropriate alternative in lieu of on-site provision on sites of 1-4 units.
2. Amend Policy CP19 to make it clear that economics of provision are material considerations and to make clear that (other than set out above) provision should normally be on-site.
3. Change policy title and make clear that the intention of the policy is to create affordable housing on market led housing sites.

### **Policy CP20**

1. Subject to the final findings of the Council's current rural housing study and the outcome of the CLG funded Rural Masterplanning project, the policy should be redrafted to allow for sites to be allocated for rural affordable housing to meet identified local needs, (possibly with a modest market element), adjoining appropriate settlements. Enabling development should not be promoted on windfall exception sites.
2. Subject to the results of the same study the target for 600 Local Connection Homes should be revisited.
3. The Policy wording should be redrafted to make it clear that 100% rural exception housing sites would still be permissible.
4. The explanatory text/glossary should be updated to define housing need by reference to households assessed as in housing need by the local housing authority

(In the interests of clarity, there may be benefit in combining some or elements of housing policies into consolidated policies in final drafting).

**Policy CP21**

1. If the Partial Review of the South East Plan is completed in time, revise Policy CP21 and its explanatory text to refer to the District's pitch requirements contained in it.
2. Amend Policy CP21's explanatory text to clarify the distinctive site requirements of Travelling Showpeople.

**Policy CP22**

1. To review the policy and supporting text in light of the PINS advice 'what, where, when and how' to ensure that all matters are covered by the policy



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<b>Response No./Organisation</b>	<b>Summary of Key Issues</b>	<b>WCC Officer response and Recommended Approach</b>
2169, 10390, 10421, 20 (Itchen Valley PC)	<p><b>Comments on paragraphs 13.1 – 13.3:</b></p> <ul style="list-style-type: none"> <li>• There is inadequate provision for the aging population and excessive reliance on large development areas. There should be a greenfield allocation for a retirement village within the Market Towns &amp; Rural Area – suggest land at Denmead.</li> <li>• Priority should be given to retirement villages on greenfield sites – suggest sites at Swanmore and Denmead.</li> <li>• Need a more sensitive approach to the</li> </ul>	<p>All of the respondents to this section of Chapter 13 refer to the comments on paragraphs 13.1 and 13.2 about an aging population, with several respondents suggesting the need to allocate land for ‘retirement villages’. They suggest that the major development allocations at Barton Farm, Whiteley, etc will provide only limited locations for such development.</p> <p>These needs are recognised in more detail later in Chapter 13 (Policies CP16 – Housing Priorities and CP17 – Housing Mix). Matters related to the aging population are also raised in representations on these Policies, to which a response is given below (see Policies CP16 and CP17).</p> <p>With regard to site allocations, the Core Strategy only deals with very large (‘strategic’) allocations and if a specific need for a retirement village is identified a site could be allocated in the Development Management and Allocations document.</p>

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	needs of elderly residents seeking to down-size by relaxing density requirements to allow a small dwelling in a garden.	Few elderly people will be in a position to develop a new dwelling in their garden and, where there are, proposals to do this should meet other policy requirements. If there are particular reasons why a lower density should be accepted these can be taken into account and Policy CP12 already gives priority to 'character' considerations.
87 (GOSE), 10455, 2198, 3071, 10189, 10394, 2123, 10420	<p><b>Comments on paragraphs 13.4 – 13.9</b></p> <ul style="list-style-type: none"> <li>• The housing numbers will need updating to reflect the approved South East Plan.</li> <li>• The references to the Central Hants Housing Market Assessment need to clarify whether this covers the whole District (including PUSH).</li> <li>• Question the SHLAA methodology and whether it follows Government advice,</li> </ul>	<p>Agreed, the next version of the Core Strategy should reflect the housing requirements of the approved South East Plan.</p> <p>The Central Hants HMA needs to be read together with the PUSH HMA. Much of the data in the former is whole district, though in some places it has been possible to disaggregate the data to the Central Hants area only. The housing needs assessment was carried out at whole district level and so the figure represents the need across the whole WCC area.</p> <p>The SHLAA was subject to a separate consultation process in Feb/March 2009 and the comments</p>

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	<p>including:</p> <ul style="list-style-type: none"> <li>○ the inclusion of 'broad locations';</li> <li>○ the small sites allowance which seems equivalent to windfall</li> <li>○ over-optimism about delivery or capacity;</li> <li>○ double counting between small sites allowance and broad locations.</li> </ul> <ul style="list-style-type: none"> <li>• Object to the inclusion of specific 'broad locations' as respondent does not wish to develop their site.</li> </ul> <ul style="list-style-type: none"> <li>• There should be allowance for the allocation of more/small greenfield sites.</li> <li>• There is an oversupply so MTRA2 does not need to make any of the 300 dwelling allocations.</li> <li>• There should be reference to the need to maintain an adequate housing supply in the period before the strategic allocations contribute housing.</li> </ul>	<p>received were reported to Cabinet in October 2009, along with recommended changes. These recommendations included removing the 'broad locations' and the small sites allowance (which would overcome any alleged double-counting). The capacity and deliverability of all sites which were questioned was re-assessed and changes were recommended as a result.</p> <p>Cabinet did not accept the recommended changes, as it wished to see the results of further work on potential greenfield sites. However, it is not anticipated that the final version of the SHLAA will include 'broad locations' or a small sites allowance.</p> <p>The completion of the SHLAA will enable an updated view to be given on the need for additional greenfield allocations. It has been agreed (report CAB1944LDF, 15 Dec 2009) that strategic allocations remain the most sustainable way of accommodating the majority of greenfield development over the Core Strategy period. Therefore the overall development strategy remains one of focussing development on large strategic sites, but the report also expects a need for smaller</p>

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	<ul style="list-style-type: none"> <li>There should be a reference to the need for retirement villages, which should be given priority on greenfield sites.</li> </ul>	<p>greenfield allocations, especially in the non-PUSH part of the District (see CAB1944LDF, para 3.5).</p> <p>It is, therefore, expected that there will be a need to allocate some smaller greenfield sites, but the precise scale will need to be assessed in the light of the final SHLAA and the housing requirements at the time. This will enable any alleged under- or over-provision to be addressed along with the timing of development.</p> <p>The evidence does not show an overriding need for retirement villages, such that they should be given priority over other housing. Should a need be established, sites can be allocated as necessary in the Development Management and Allocations DPD.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>Update the explanatory text to reflect the housing requirements of the approved South East Plan and to clarify the coverage of the Housing Market Assessment.</li> <li>Remove the 'broad locations' and small sites</li> </ol>

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		<p>allowance from the SHLAA.</p> <p>3. Reconsider the likely scale of any 'non-strategic' greenfield allocations in the light of the revised SHLAA and housing requirements at the time. The Core Strategy should give an indication of the scale of smaller allocations and that these will reflect the settlement hierarchy, but any non-strategic allocations should be made through the Development Management and Allocations DPD.</p>
<p>87 (GOSE), 2121, 3071, 10394, 10455, 36 (Swanmore PC), 89 (HCC), 140, 2123, 10460, 2116</p>	<p><b>Comments on paragraph 13.10/Table 3</b></p> <ul style="list-style-type: none"> <li>• The small site allowance seems equivalent to windfall. PPS3 seeks certainty and past levels of windfall may not continue.</li> <li>• There should be a non-delivery allowance for committed sites.</li> <li>• There is no evidence to justify the 'other greenfield sites' line.</li> <li>• Welcome the inclusion of 'other greenfield sites' line but it is unclear how the figures</li> </ul>	<p>It is agreed that the small sites allowance should be removed to reflect the advice of the Planning Inspectorate.</p> <p>There is already a 'non-delivery' allowance for committed sites.</p> <p>It is agreed that the 'other greenfield sites' line in Table 3 will need to be updated (see Recommended Approach 3 above) and that it should be clearer how</p>

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	<p>were derived.</p> <ul style="list-style-type: none"> <li>• Table 3 does not include the allocations proposed in MTRA2 or an explanation of these figures. Their inclusion would result in an oversupply in the PUSH area.</li> <li>• The housing numbers in Table 3 are difficult to understand and do not match the figures in MTRA2.</li> <li>• Object to the reliance on the SHLAA which doesn't follow Government guidance. Further land will need to be allocated.</li> <li>• Table 3 is misleading as the SHLAA is not yet completed and doesn't include greenfield sites. There are insufficient contingency sites in the main settlements.</li> <li>• There should be more small greenfield allocations and less allocated to the major sites.</li> </ul>	<p>this relates to the provisions for development in the settlements.</p> <p>The SHLAA is in the process of being finalised, taking account of the various comments received and of Government advice. It is agreed that further greenfield allocations are likely to be needed and the revised SHLAA will help to clarify their scale. The further work on the SHLAA includes consideration of potential greenfield sites.</p> <p>It has been agreed that the overall development strategy should remain one of focussing development on large strategic sites (see report CAB1944LDF, 15 Dec 2009), but the report also</p>

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<b>Response No./Organisation</b>	<b>Summary of Key Issues</b>	<b>WCC Officer response and Recommended Approach</b>
	<ul style="list-style-type: none"> <li>Table 3 should be revised to show completions and commitments and then the options for achieving the balance of the housing requirement.</li> </ul>	<p>expects a need for smaller greenfield allocations, especially in the non-PUSH part of the District.</p> <p>It is not accepted that only completions and commitments should be taken into account. The SHLAA is a key element of the evidence base, as recognised in Government advice, and its conclusions are critical to assessing the need for housing land releases.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>Remove the small sites allowance from Table 3 (paragraph 13.10).</li> <li>Update the 'other greenfield allocations' line, in Table 3 in the light of the revised SHLAA and housing requirements at the time, and relate this to the provisions for development in the settlements.</li> </ol>
87 (GOSE), 2198, 2991, 36 (Swanmore)	<p><b>Comments on paragraphs 13.11 – 13.16</b></p> <ul style="list-style-type: none"> <li>Need to be careful when talking about reserve sites, to avoid confusion about the</li> </ul>	It is agreed that it needs to be clear which reserve sites are being referred to, although the paragraph

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PC), 2123, 10178	<p>status of sites and the Council's intentions.</p> <ul style="list-style-type: none"> <li>Local Reserve Sites in the Development Allocations DPD have already been assessed and should be treated as commitments, not considered in the Development Allocations DPD.</li> <li>Local Reserve Sites should be released ahead of other greenfield sites as they have already been found suitable for development.</li> <li>Paragraph 13.12 is inconsistent with Policy MTRA2 as MTRA2 says that greenfield sites will be released in Level 1 and 2 settlements whereas paragraph 13.12 says they will be released 'if needed'.</li> <li>Paragraph 13.12 is not clear about whether there will be any 'non-strategic' greenfield allocations in Winchester, as it refers to an</li> </ul>	<p>concerned does refer to Local Reserve Sites.</p> <p>Commitments are sites which are firm plan allocations or have planning permission, which did not apply to the Local Reserve Sites at the time of producing the Preferred Option document. There are planning applications and appeals on some of these sites and their status may therefore change and need to be updated.</p> <p>The Core Strategy does not allocate 'non-strategic' sites so it is not for that document to change the status of Local Reserve Sites. It is, therefore, appropriate that these sites are assessed, alongside others, by the SHLAA, with any necessary allocations being made in the Development Management and Allocations DPD.</p> <p>It is agreed that Policy MTRA2 and paragraph 13.12 should be clear and consistent and that any changes to these parts of the Plan should seek to ensure this. There is also a need to clarify the role of the 'urban areas' (Winchester, Whiteley, Waterlooville) in relation to the rural settlement hierarchy (Policy MTRA2). It present there is a commitment to some smaller</p>



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	<p>allowance of 1000 greenfield dwellings in the MTRA2 settlements. Winchester is the most sustainable settlement so should have an allowance for smaller greenfield sites.</p> <ul style="list-style-type: none"> <li>• The reference to the Structure Plan requirement in paragraph 13.14 is incorrect as it does not include the strategic reserve site allowance of 3000 dwellings. Future versions should consider whether this information is necessary and accurate.</li> <li>• The references to the Hedge End SDA in paragraph 13.16 are too brief and should state that the SDA housing requirement will be split between Winchester District and Eastleigh Borough on the basis of further study.</li> </ul>	<p>greenfield allocations in MTRA2 Level 1 and 2 settlements, but not in the urban areas. It is recognised that this is inconsistent and as the urban areas are the most sustainable locations for development and need to feature in the settlement hierarchy and allocation of sites.</p> <p>It is not accepted that the 'strategic reserve' of 3000 dwellings was part of the Structure Plan's 'baseline' housing requirement for the District, as it was never 'triggered'. It is agreed that it may not be necessary to refer to this in the next version of the Core Strategy.</p> <p>There is a separate policy on the Hedge End SDA (Policy SH4) and the Committee agreed at its last meeting that the next version of the Core Strategy will need to include a more detailed policy on the SDA (see CAB1944LDF, 15 Dec 2009). This will indicate the land uses proposed and the extent of development. However, it would not be appropriate to include this level of detail in paragraph 13.16, which is merely intended to point out that the housing requirement for the SDA is separate from the Winchester District</p>

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		<p>housing requirement.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>1. Clarify and update references to Local Reserve Sites as necessary, but continue to state that they would be reviewed in the Development Management and Allocations DPD (if not already released).</li> <li>2. Ensure that references to development in the rural settlements are consistent with the revised Policy MTRA2 (see responses to Chapter 7) and clarify that the 'urban areas' are at the top of the 'settlement hierarchy' in terms of sustainability.</li> <li>3. Reconsider whether references to the previous Structure Plan requirements in paragraph 13.14 remain necessary.</li> </ol>

**Policy CP15 – Housing Provision**

<b>Policy CP15 – Housing Provision</b>		
<b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b>		
<p>This policy outlines the overall dwelling requirement for the plan period to the Core Strategy. Appraisal of the apportionment and expected level of development has been appraised at policies WT1-3 and SH1-5 when considering the strategy and the site allocations. Any new development has the potential to lead to some adverse impact, depending on the location and existing sensitivities and it is the detail of other policies and the location and detail of strategic allocations, which will mitigate against the potential impacts (as discussed in earlier appraisal summaries).</p>		
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	<b>Comments on Policy CP15</b>	
	<u>Support Policy CP15</u>	
2273, 10453 (PUSH), 10423, 10269 (MOD), 10395, 3136	<ul style="list-style-type: none"> <li>• Support Policy CP15.</li> <li>• Policy CP15 sets out the strategic housing requirement for South Hampshire in accordance with the sub-regional strategy.</li> <li>• Support the wording of CP15 and the compliance with the split-District housing requirement in the South East Plan.</li> <li>• Note the housing targets. Any military accommodation as a result of expansion at Worthy Down and Southwick Park would be additional to these targets.</li> <li>• Welcome the higher levels of housing growth</li> </ul>	<p>The support is noted. It is agreed that any future accommodation for military purposes (which is not available to the general public) would not count towards meeting the housing targets for the District. These targets will be updated to reflect the adopted South East Plan (see Recommended Approaches above).</p>

<b>Policy CP15 – Housing Provision</b>		
	<p>to sustain 3% GVA per annum.</p> <ul style="list-style-type: none"> <li>• Presume the non-PUSH housing requirement will be reduced to reflect the adopted South East Plan.</li> </ul>	
<p>4 (Bishops Waltham PC), 84 (SEERA), 87 (GOSE), 2107, 2116, 2117, 2174, 2175, 2229, 2774, 2991, 10042, 10212, 10214, 10423, 10258, 10390, 10393, 10407, 10411, 10412, 10413, 10416, 10421, 10440, 10448, 10455</p>	<p><u>Object to Policy CP15 for the following reasons:</u></p> <ul style="list-style-type: none"> <li>• Accept CP15 but Bishops Waltham and Wickham should not be in PUSH.</li> <li>• The dwelling requirement for the non-PUSH area has been reduced by the SE Plan to 5,500. Policy CP15 should be amended accordingly.</li> <li>• The policies should indicate how best use will be made of the housing stock in accordance with SE Plan Policy H6.</li> </ul>	<p>The PUSH area and its boundary are defined by the approved South East Plan and it is not an option for the Core Strategy to change them. However, the Core Strategy recognises that large parts of PUSH within Winchester District are rural in character and includes these within the 'Market Towns and Rural Areas' spatial area (see Policy SS1).</p> <p>It is agreed that CP15 should be amended to reflect the adopted South East Plan's housing requirements.</p> <p>SE Plan Policy H6 suggests that local authorities should assess their housing stock and implement measures to reduce the number of vacant, unfit and unsatisfactory dwellings. Surveys in the City Council's area suggest there is not a significant number of vacant, unfit or unsatisfactory dwellings and this is not, therefore, an issue which requires a Core Strategy policy. Other strategies are in place to address these</p>

Policy CP15 – Housing Provision		
	<ul style="list-style-type: none"> <li>• The SHLAA is flawed as it is over-optimistic, due to: <ul style="list-style-type: none"> <li>○ the small sites allowance which seems equivalent to windfall</li> <li>○ the greenfield site allowance is not consistent with Policy MTRA2.</li> </ul> </li> <li>• Object to the reliance on: <ul style="list-style-type: none"> <li>○ small sites;</li> <li>○ SHLAA sites which are not all available;</li> <li>○ commitments;</li> <li>○ Strategic allocations and SDAs which are unlikely to provide the numbers predicted.</li> </ul> </li> <li>• The housing numbers are inconsistent with the figures in MTRA2.</li> <li>• Doubt the deliverability of the strategic allocations so the ‘other allocations’ for PUSH should be increased to at least 600.</li>   <li>• The strategic allocations should be reduced and smaller greenfield sites allocated around Winchester and the market towns in PUSH.</li> <li>• The Barton Farm allocation should be reduced to 1500 with the ‘other allocations’ figure for non-PUSH increased to at least 1000.</li> <li>• The housing figures underestimate the need for greenfield sites at Winchester. Barton</li> </ul>	<p>issues, such as the Private Sector Housing Strategy.</p> <p>Further work is underway on the SHLAA, as noted in response to other comments (above), including an assessment of potential greenfield sites. The need for greenfield allocations will be reassessed in the light of the conclusions reached. Further work is also proposed on deliverability of the strategic allocations and SDAs, which will also be taken into account.</p> <p>It has been concluded that strategic allocations remain the most sustainable way of accommodating the majority of greenfield development over the Core Strategy period. Alternative sites in the non-PUSH area have been assessed but Barton Farm is considered to remain the most suitable (report CAB1944LDF, 15 Dec 2009).</p>

Policy CP15 – Housing Provision		
	<p>Farm is not the most appropriate site and the allocation should be reduced and a new site allocation made to the south-west of Winchester.</p> <ul style="list-style-type: none"> <li>• Development is focussed on limited locations without adequate contingencies. Unmet needs should also be met and Kings Worthy could accommodate a greater proportion of the non-PUSH requirement.</li> <li>• There should be a contingency plan if the PUSH strategic sites do not deliver at the rate expected, as alternative sites may be needed.</li> <li>• The Core Strategy should make more provision for small, accessible properties in central locations for people with learning disabilities.</li> <li>• There should be a commitment to review settlement boundaries to ensure the housing targets can be met.</li> <li>• Too many houses are planned in Hampshire.</li> </ul>	<p>It is acknowledged that consideration needs to be given to contingency arrangements and that further work is needed on deliverability, as recommended by the Planning Inspectorate. Whilst the strategic allocations are believed to be deliverable within the Plan period it may be necessary to identify contingencies to maintain housing delivery if sites are delayed.</p> <p>The Core Strategy promotes development on brownfield sites to meet a range of needs (Policy CP16).</p> <p>The Core Strategy is committed to meeting the required housing targets by a range of means which will require some greenfield allocations. Therefore some settlement boundaries will inevitably need to be</p>

<b>Policy CP15 – Housing Provision</b>	
	<ul style="list-style-type: none"> <li>• The Council should take a stand against inflated housing requirements and the Plan should be flexible enough to be changed if the Government changes.</li> </ul> <p>changed.</p> <p>The Core Strategy must meet the requirements of the South East Plan and could not be adopted if it failed to do so. The Core Strategy will not be submitted for independent examination until early 2011, so it will be possible to reflect any changes that may be made to regional planning guidance.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>1. Amend CP.15 to reflect the adopted South East Plan’s housing requirements, or any changes which may be made prior to the publication of the next stage of the Core Strategy.</li> <li>2. Complete work on the SHLAA and deliverability of strategic allocations, to enable the need for smaller greenfield site allocations and/or contingencies to be defined (with any allocations being made in the Development Management and Allocations DPD).</li> </ol>

**Policy CP16 – Housing Priorities**

<b>Policy CP16 – Housing Priorities</b>		
<b>Response no./ Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
<p><b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b></p> <p>Policies CP 18, 19 and 20 all deal with the provision of both urban and rural affordable housing and this policy adds that priority will be given to that provision but does not explain how.</p> <p>The second part of the policy requires that all dwellings meet a wide range of community requirements, however the intent of the policy is not entirely clear. It appears to refer to the need that a wide range of community requirements such as sheltered housing, special needs housing, residential accommodation for the elderly and nursing homes, should be provided. If this is the case, then this need cannot be met by all new dwellings but, it can be met by some of them, thereby progressing sustainability objectives for housing, community and health. To contribute more effectively to the sustainability of the plan this policy should be given careful consideration and clarified.</p>		
<b>Response no./Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
	<b>Comments on Policy CP16</b>	
	<u>Support Policy CP.16</u>	
87 (Bishops Waltham)	<ul style="list-style-type: none"> <li>Support the priority given to affordable housing</li> </ul>	The support is noted and welcomed.



Policy CP16 – Housing Priorities		
PC); 2175; 2273;10440 (Winchester Liberal Democrats)		
84 (SEERA); 87 (GOSE); 2116; 10037; 10423;	<p><u>Object to Policy CP.16</u></p> <ul style="list-style-type: none"> <li>• To reduce length of document consider, whether this policy is required.</li> <li>• Delete Policy CP.16.</li> </ul> <ul style="list-style-type: none"> <li>• Refer to extra care housing to reflect South East Plan Policy.</li> <li>• Students should be mentioned because of their impact on the stock of affordable housing.</li> <li>• Policy is insufficiently flexible. Core Strategy should seek to meet the need for a range of housing.</li> </ul>	<p>It is suggested that the points within this policy become a policy objective and be combined with the objectives currently in CP 18 (see below), and that further details concerning particular community needs can be incorporated into explanatory text.</p> <p>The policy aims to ensure that new dwellings meet a range of community needs without mentioning specific groups such as students or older people. The explanatory text does mention the need to meet the requirements of an aging population and other specific groups. Evidence presented by HCC and WCC’s own Older Person’s Housing Strategy support the need for extra care provision. Policies permit opportunity led residential development whether for extra care, students or other groups. Reference to extra care housing can be incorporated into explanatory text and Strategic Housing Allocation Policies. Similarly student housing (which is only a significant issue for</p>

Policy CP16 – Housing Priorities		
	<ul style="list-style-type: none"> <li>• The presumption in favour of affordable housing would undermine the principle that market housing is needed to deliver affordable.</li> <li>• Affordable housing should not be prioritised, because market housing is also needed.</li>   <li>• The requirement for Lifetime Homes is undeliverable.</li> <li>• There is no need to refer to Lifetime Homes as it is likely to become a requirement.</li> </ul>	<p>Winchester Town) can be covered by explanatory text and by an amendment to policy WT1 (first bullet).</p> <p>By seeking to meet a wide range of needs the policy recognises the need for market housing and CP.18 sets an affordable housing target. There is, therefore, no statement or implication that market housing is not needed. However, the need for affordable housing is so high that it is important that priority is attached to achieving targets. Policy CP.18 sets affordable housing targets within the overall housing targets .</p> <p>The Government's 2008 publication <i>Lifetime Homes, Lifetime Neighbourhoods</i> makes it clear that the aim is for all new housing to be built to Lifetime Homes standards by 2013. It is not yet clear how this will be enforced, hence the inclusion within the Core Strategy. It is, however, suggested this become a policy objective and that reference is changed to <i>flexible, adaptable accommodation, such as Lifetime Homes</i> (see below).</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>1. Delete Policy CP.16 and instead express these issues as objectives (combined with Policy CP.18) that encompass the principles set out in the currently proposed policies. Include</li> </ol>

Policy CP16 – Housing Priorities		
		<p>reference in the explanatory text to refer to needs of particular populations such as older people and students, including to ...<i>flexible, adaptable accommodation, such as Lifetime Homes.</i></p> <ol style="list-style-type: none"> <li>2. Reference to extra care housing to be incorporated into Strategic Site Allocation Policies.</li> <li>3. Reference to student housing to be incorporated into Policy WT1 (first bullet).</li> </ol>

**Policy CP17 - Housing Mix**

<b>Policy CP17 - Housing Mix</b>		
<b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b>		
<p>This is a very specific policy which is intended to avoid the saturation of the market with standard units. The appraisal indicates that the policy will bring about indirect benefits for communities and general health. No adverse impacts identified that require mitigation were identified by the SA.</p>		
<b>Response no./Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
	<b><u>Comments on Policy CP17</u></b>	
	<b><u>Support Policy CP.17</u></b>	
13 (Denmead PC); 42 (Wickham PC); 2123; 2175; 2273; 2991; 3198; 3204; 10423	<ul style="list-style-type: none"> <li>• Welcome shift to 2 and 3 bed houses.</li> <li>• Supports local circumstances to address an imbalance of housing types and sizes.</li> <li>• Welcome less prescriptive approach.</li> <li>• Market should be allowed to influence the mix – policy isn't prescriptive and so supported.</li> <li>• Greatest weight should be on influencing the mix of affordable properties.</li> </ul>	The support is noted and welcomed.
	<b><u>Object to Policy CP.17</u></b>	
4 (Bishops	<ul style="list-style-type: none"> <li>• PPS3 states the proportions of households that</li> </ul>	The SHMA sets out the proportion of affordable

<b>Policy CP17 - Housing Mix</b>		
<p>Waltham PC); 25 (New Alresford TC); 42 (Wickham PC); 7 (GOSE); 89 (HCC); 2197; 2116; 2121; 2198; 10037; 10064; 10399; 10401; 10411; 10412; 10413; 10440</p>	<p>require market and affordable housing should be set out, and the likely profile for market housing and the size and type of affordable.</p> <ul style="list-style-type: none"> <li>• There should be greater flexibility and mix determined on a site by site basis. Market evidence should be used to determine mix. Table 5 should reflect the evidence for larger units.</li> <li>• Too much emphasis on small dwellings.</li> <li>• Emphasis on 2 and 3 beds could also create an imbalance.</li> <li>• Reference should be deleted in the policy to 2 and 3 beds.</li> <li>• Policy does not accurately reflect the evidence that the bulk of demand is likely to come from</li> </ul>	<p>housing needed to meet needs (approximately 70% - para 13.28 of Preferred Options). However, the Viability Study indicates that this would not be achievable. Policies CP.18/19 set affordable housing targets and targets for quota sites based on the Viability Study recommendations (see amendment to CP.18 below) and CP.20 proposes a local connections affordable housing target. Table 5 sets out a profile of indicative dwelling mix requirements for guidance. For the reasons set out in 13.23 it is considered that a flexible policy framework in terms of size and type is appropriate. Paragraph 13.37 indicates priority will normally be given to the provision of family housing and this is reflected in CP.18.</p> <p>While Table 5 is intended to give an indication of likely demand but should not be regarded as prescriptive. The policy is deliberately flexible and, as paragraph 13.23 states, it is important that the market is able to react to changes in economic circumstances and patterns of demand. It thus allows both need and demand to be taken into account. Furthermore the policy is not prescriptive about proportions (of any size of dwelling) and aims to provide a range of dwellings, though it does suggest that (overall supply) should include a significant proportion of 2 and 3 bed houses. Evidence suggests that the bulk of demand (around 60%) is likely to be for 2 and 3 beds (most of that</p>

Policy CP17 - Housing Mix		
	<p>those requiring 2 and 3 bed houses.</p> <ul style="list-style-type: none"> <li>• Policy should distinguish between flats and houses and reflect the need for 2-3 bed dwellings as well as the market demand. Table 5 should be amended.</li> <li>• Policy is too prescriptive and should be reworded to take into account the appropriateness of higher densities in central areas and making the efficient use of land.</li> <li>• Housing Mix should be dealt with in DPD not the Core Strategy.</li> <li>• Veto single person units.</li> <li>• Need to take account of the proposed economic development in different parts of the District.</li> <li>• Need to control the increase in bedrooms in current properties.</li> </ul>	<p>demand being for 3 beds). The policy allows for smaller and larger dwellings to be built to reflect local site circumstances and patterns of demand. To include specific requirements for each dwelling size would result in a loss of flexibility. The policy does place emphasis on the provision of <i>houses</i>.</p> <p>The policy itself does not deal with density issues which are covered by Policy CP.12.</p> <p>It is consistent with PPS3 that LDFs should set out the likely profile for market housing and the size and type of affordable. High level policies such as this should be contained within Core Strategies.</p> <p>Give the profile of demand and need it is not considered to be an appropriate to veto single person units.</p> <p>The policy allows for local circumstances to be taken into account, this could include proposed economic development.</p> <p>This is beyond the scope of the Core Strategy, but can be dealt with as a development management issue if considered necessary.</p>

<b>Policy CP17 - Housing Mix</b>		
	<ul style="list-style-type: none"> <li>• Given the projected growth in 1 person pensioner households reference should be made to extra care housing. There should be a separate policy on extra care and a target number of units.</li>   <li>• Students should be mentioned because of their impact on the stock of affordable housing.</li>   <li>• Policy should be used avoid provision of social rented in Wickham Parish; although meeting local needs would be supported.</li> </ul>	<p>Reference to specific forms of specialised housing such as extra care can be made in the objective that will be written to replace CP.16 and explanatory text and CP.17 amended (see below). There is no justification for a separate numerical target, however see comments on CP.16 (above) and the recommendation that extra care housing policies be incorporated into Strategic Site Allocation Policies.</p> <p>See comments on CP.16 (above).</p> <p>Policy CP.17 deals with size mix, rather than tenure mix.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>1. Delete reference to Table 5 in Policy CP.17 and refer to it in the explanatory text, indicating that this gives guidance on current and future demand.</li>   <li>2. Amend Policy CP.17 and explanatory text to refer to providing meeting a wide range of community needs (including those referred to in the objective that will replace CP.16),</li> </ol>

Policy CP17 - Housing Mix		
		<p>maximising affordable housing, in particular family houses for social rent (having regard to sustainability, housing need and the economics of development), providing flexible, adaptable homes, such as Lifetime Homes and allowing for specialised accommodation.</p>



**Policy CP18 - Affordable Housing**

<b>Policy CP18 - Affordable Housing</b>		
<b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b>		
<p>The policy sets out the requirements for affordable housing and will generally have no specific impacts on the majority of objectives because the housing is “affordable” i.e. for social rent or shared equity, and will mainly be a component of the large allocated sites. Therefore the impact of the affordable housing is encompassed in that related to the overall housing requirement. The exception to this will be the smaller sites built on infill plots and on publicly owned land and the “local connections” housing. The different types of provision are fully assessed under Policies CP19 and 20 below. The policy will progress sustainability objectives in relation to communities, housing provision and health.</p>		
<b>Response no./Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
	<b>Comments on Policy CP18</b>	
78; 1994; 10097	<p><u>No Comment</u></p> <ul style="list-style-type: none"> <li>• The 35% requirement is inconsistent with other policies.</li> <li>• More detail is needed regarding mixed and balanced communities.</li> <li>• PPS3 requires clear targets for rural affordable</li> </ul>	<p>It is not agreed that this is inconsistent. Other policies set a target for <i>quota</i> sites of 40%, but the 35% target in CP18 is <i>overall</i> provision. It is recommended that the nature of the 35% target be clarified (see above).</p> <p>This can be dealt with in the explanatory text.</p> <p>Policy CP19 contains this (600 dwellings).</p>

<b>Policy CP18 - Affordable Housing</b>		
	<p>housing.</p> <ul style="list-style-type: none"> <li>• Affordable housing should remain so in perpetuity.</li> <li>• The SPD will need to be reviewed once policies adopted.</li> <li>• Affordable homes must be for social rent.</li> </ul>	<p>Agreed, the explanatory text should be amended to make this clear.</p> <p>Noted, para 13.42 deals with this.</p> <p>Priority is given to the provision of homes for social rent, however it is also considered important to meet a range of needs. The approach is consistent with the SE Plan.</p>
<p>13 (Denmead PC); 33 (south Wonston PC); 2175; 2273; 10055; 10453 (PUSH)</p>	<p><u>Support Policy CP18</u></p> <ul style="list-style-type: none"> <li>• Helps redress the imbalance in housing provision and young people live locally.</li> <li>• Further exception site would be supported (South Wonston).</li> <li>• Support on site mix of tenures.</li> <li>• Accords with PUSH requirements.</li> </ul>	<p>The support is noted and welcomed.</p>
<p>4 (Bishops Waltham PC); 42 (Wickham PC);</p>	<p><u>Object to Policy CP18</u></p> <ul style="list-style-type: none"> <li>• Increase percentage to 40% in line with other policies.</li> <li>• The target should be 50 or 75%.</li> </ul>	<p>Other policies set a target for <i>quota</i> sites of 40%, the 35% target in CP18 is <i>overall</i> provision that reflects historic provision during the plan period and the fact</p>

Policy CP18 - Affordable Housing		
<p>77 (Fareham BC); 87 (GOSE); 89 (HCC); 123; 2116; 2121; 2123; 3071; 3204; 10037; 10064; 10097; 10253; 10256; 10390; 10395; 10420; 10421; 10423; 10455</p>	<ul style="list-style-type: none"> <li>• The Local Connection Homes Target too low.</li> <li>• 40% affordable housing and 70% social rented too high for Wickham. Account should be taken of the existing high proportion of affordable housing provision.</li> <li>• Wickham should be exempt from a blanket affordable housing requirement.</li> <li>• There should be a more balanced approach to provision in places like Wickham.</li> <li>• 40% is in excess of the South-East Plan</li> </ul>	<p>that some sites will not provide affordable housing before the adoption of the Core Strategy. The target reflects the findings of the viability study and is expressed as a minimum rather than a maximum.</p> <p>This will be reviewed in the light of the current viability study and the CLG sponsored Rural Masterplanning project.</p> <p>The target in CP18 is 35% - CP.19 refers to 40%/70%. The Housing Market Assessments evidence the need and targets. Local data, such as from the Council's Housing Register information demonstrates there are high housing needs in Wickham. There is no justification for an exemption, however local housing needs will be taken into account when considering development proposals and the type of affordable housing to be provided. Sub-section <i>f</i> of the policy should be reworded to make clear that other relevant local circumstances will be taken into account. CP19 allows for off-site provision in order to create sustainable and mixed communities. Negotiation will take place on a site by site basis as set out in explanatory text. See also comments on CP19 (below).</p> <p>The 35% target in the SE Plan is a region-side target, not a District target. Need (including Whiteley &amp;</p>

Policy CP18 - Affordable Housing		
	<p>requirement. It is not clear whether needs at Whiteley and the PUSH area are evidenced.</p> <ul style="list-style-type: none"> <li>• Conflicts with the South East Plan region wide target of 35% (30-40% in the PUSH area). 40% would make sites unviable.</li> <li>• CP18 and CP19 are contradictory and should be combined.</li> <li>• Policy not needed as issues covered elsewhere.</li> </ul> <ul style="list-style-type: none"> <li>• An intermediate housing target does not appear.</li> <li>• There should be specific reference to extra care provision in bullet <i>d</i>.</li> <li>• Change policy to <i>up to 35%</i>.</li> <li>• Replace <i>at least</i> with <i>target/policy</i> inflexible</li> </ul> <ul style="list-style-type: none"> <li>• Change refer to aiming for at least 35%...by setting 40% requirement.</li> </ul>	<p>PUSH) is evidenced through Housing Market Assessments. The viability comment is more relevant to CP19 (the Viability Studies support that proposed policy).</p> <p>It is not accepted that the Policies are contradictory as CP18 sets a District-wide target for all housing and CP19 one for quota sites. These issues are not adequately covered elsewhere. PPS3 recommends that the proportion of affordable housing be set out. However, the policy can be better expressed as a set of objectives and combined with CP16.</p> <p>Amend bullet b to include a 70%/30% split in favour of social rented housing.</p> <p>Accepted.</p> <p>The need for affordable housing significantly exceeds 35%. If more affordable housing can be achieved then it would be sensible to so this. CP18 allows flexibility.</p> <p>CP19 deals with this so amendment not necessary.</p>

Policy CP18 - Affordable Housing		
	<ul style="list-style-type: none"> <li>• Students should be mentioned because of their impact on the stock of affordable housing.</li>   <li>• There has been a change of circumstances since the SHMA. Other fiscal measures are more appropriate than rigid planning policies.</li>   <li>• Affordable housing synonymous with low quality.</li>   <li>• Broaden the definition of key workers to include private sector workers.</li>   <li>• The District is very diverse. Consideration should be given to localised affordability and house price drivers. Hence a differing policy approach is needed.</li> </ul>	<p>The policy aims to ensure that new dwellings meet a range of community needs without mentioning specific groups such as students. The needs of students are not limited to affordable housing (but see above).</p> <p>Affordability has worsened since the SHMA. The policies are not overly rigid. Government still advocates the use of the planning system to provide affordable housing and PPS3 requires that local planning policies to set out affordable housing requirements.</p> <p>Affordable housing is built to high standards, for instance to a Code for Sustainable Homes level that is higher than most market developments. Paragraph 13.39 deals with design standards,</p> <p>Key workers as a group are not covered by the Core Strategy. There are other mechanisms that deal with key worker issues, for instance through HCA Zone Agents and Government/HCA housing policies.</p> <p>CP18 sets a District-wide target. The viability study supports the proposed policy which allows flexibility to take into account localised housing needs and the economics of provision.</p> <p><b><u>Recommended Approach:-</u></b></p>

Policy CP18 - Affordable Housing		
		<ol style="list-style-type: none"> <li>1. Delete policy CP18 and instead express issues as objectives (combined with Policy CP16) that encompasses the principles set out in the currently policy.</li> <li>2. Make clear that 35% is an overall target, not a quota for market sites.</li> <li>3. Amend bullet <i>b</i> to include reference to the proportion of social rented housing to be approximately 70% (with the remainder to be intermediate affordable housing)</li> <li>4. Amend bullet <i>d</i> to include reference to extra care, flexible adaptable accommodation, such as Lifetime Homes, and those with disabilities and support needs.</li> <li>5. Amend bullet <i>f</i> to refer to <i>other relevant local circumstances</i>.</li> <li>6. Refer to mixed and balanced communities and to cross reference to CP20.</li> <li>7. Review the Local Connection target in the light of the viability report and the CLG sponsored Rural Masterplanning project.</li> </ol>

<b>Policy CP18 - Affordable Housing</b>		
		8 Amend text to make clear affordable housing should be available in perpetuity.

**Policy CP19 - Affordable Housing- Quota sites**

<b>Policy CP19 - Affordable Housing- Quota sites</b>		
<b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b>		
<p>The quota housing will be part of the housing requirement met on the allocated sites and as such which will have no extra impact over and above that already assessed for previous policies. In addition, all other housing developments, of which the affordable housing will be a component, will have undergone rigorous assessment of impact on historic built environment, landscape and biodiversity issues. There will be a long term and cumulative impact on one of the District's main objectives and identified sustainability issue of providing good quality housing for all. As noted under Policy CP18, most housing association development is already subject to meeting level 3 of the CSH which includes water and energy demand techniques.</p>		
<b>Response no./Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
	<b>Comments on Policy CP.19</b>	
	<u>Support Policy CP.19</u>	
4 (Bishops Waltham PC); 13 (Denmead PC); 113; 2175; 2273; 10269	<ul style="list-style-type: none"> <li>• Provision should be widespread throughout the District.</li> <li>• Helps redress the imbalance in housing provision and young people live locally.</li> <li>• Support the 40% requirement for Alresford.</li> <li>• Service Family Accommodation falls outside normal housing provision and so should not be subject to the quota. MOD will agree to accommodation to be safeguarded for military use until not needed.</li> </ul>	The support is noted. It is agreed that the policy would not apply to future accommodation for military purposes (which is not available to the general public).



Policy CP19 - Affordable Housing- Quota sites		
<p>31 (Shedfield PC); 42 (Wickham PC); 87 (GOSE); 123; 1269; 1918; 2107; 2116; 2121; 2123; 2991; 10037; 10060; 10062; 10063; 10064; 10193; 10256; 10262; 10399; 10401; 10411; 10423; 10437; 10455; 10460</p>	<p><u>Object to Policy CP19</u></p> <ul style="list-style-type: none"> <li>• The target should be 50 or 75%.</li> <li>• Is there justification for no site size threshold?</li> <li>• No justification for 40%.</li> <li>• 40% too high.</li> <li>• 40% will make sites unviable</li> <li>• Link 40% to viability.</li> <li>• Policy fails to refer to the economics of provision.</li> <li>• Policy should be applied flexibly.</li> <li>• Change policy to <i>up to</i> 40%</li> <li>• Express 40% as a target.</li> <li>• 40% inconsistent with the South-East plan</li> <li>• 70% social rented target needs to be applied flexibly.</li> <li>• 70% social rent target should be deleted</li> </ul>	<p>The target reflects the findings of the Viability Studies.</p> <p>These matters are justified by the SHMA and Viability Studies. CP18 allows for flexibility and CP19 should be amended to reflect this. The Policy says “normally” so flexibility is there. Viability is covered by CP18 <i>f</i> and Para 13.43 indicates the precise number will be negotiated for each development. However, additional wording can be added to CP19 to make it clear that the economics of provision are important (see below) and there should also be clarification of the policy intention.</p> <p>The need for affordable housing significantly exceeds 40%.</p> <p>Policy says “expected to” it is considered this amounts to a target. Para 13.43 indicates that the precise number will be negotiated for each development.</p> <p>SE Plan target is a region-wide target.</p> <p>CP18 <i>f</i>. Para. 13.43 provides for negotiation on a site by site basis. PPS3 requires a target to be set for</p>

Policy CP19 - Affordable Housing- Quota sites		
	<p>and placed into explanatory text and that wording be replaced with that in para.13.43.</p> <ul style="list-style-type: none"> <li>• Delete policy and utilise target percentages and settlement site thresholds from the Local Plan.</li> <li>• Site size threshold should be retained/or alternative threshold.</li> <li>• Affordable housing should be required from all developments.</li> <li>• Release greenfield sites such as Francis Gardens to help meet affordable housing needs.</li> <li>• Students should be mentioned because of their impact on the stock of affordable housing.</li> <li>• HARAHA should take more responsibility for delivery rather than relying on private developers.</li> </ul>	<p>social rent, so it is appropriate for this to be in the Policy.</p> <p>Current policies are delivering insufficient affordable housing to meet needs. The proposal for 40% and removal of thresholds is supported by viability studies and the SHMA</p> <p>The Policy provides for this. The Council’s Small Sites Viability Study confirms this approach, suggesting that on sites of 1-4 dwellings a financial contribution in lieu of on-site affordable housing provision would be appropriate.</p> <p>Greenfield reserve sites such as Francis Gardens are not ‘strategic’ and so should not feature in the Core Strategy.</p> <p>The policy aims to ensure that new dwellings meet a range of community needs without mentioning specific groups such as students. The needs of students are not limited to affordable housing (but see above).</p> <p>HARAHA has a very specific role within a mixture of methods of delivery, all of which are needed to maximise affordable housing supply. CP20 supports</p>

Policy CP19 - Affordable Housing- Quota sites		
	<ul style="list-style-type: none"> <li>• There has been a change of circumstances since the SHMA. Other fiscal measures are more appropriate than rigid planning policies.</li> <li>• CP18 and CP19 are inconsistent and should be combined.</li> <li>• In Shedfield all affordable housing should be for local connections.</li> <li>• 40% affordable housing and 70% social rented is too high for Wickham. Account should be taken of the existing high proportion of affordable housing provision. Policies should prevent social rented provision in Wickham Parish; although meeting local needs would be supported. More social rented housing would create social imbalance and deprivation.</li> <li>• Wickham target should be 35%</li> <li>• 40% for Wickham too high,</li> </ul>	<p>HARAH's role.</p> <p>Affordability has worsened since the SHMA. The Policies are not overly rigid. Government still advocates the use of the planning system to provide affordable housing and PPS3 requires that local planning policies to set out affordable housing requirements.</p> <p>It is not accepted that the Policies are contradictory as CP19 sets a target for <i>quota</i> sites of 40%, but the 35% target in CP.18 is <i>overall</i> provision</p> <p>It would not be possible to substantiate a local connection's only policy on quota sites (CP20 deals with local connections).</p> <p>The SHMA shows there is a need for significant affordable housing growth and that social rented provision should be a priority and evidences need and targets. Local data, such as from the Council's Housing Register, demonstrates there are high housing needs in Wickham. The demand for social rented homes is high in Wickham (including from those with a local connection). There is no persuasive evidence that the policy approach (which is a District-wide approach) will cause social imbalance or deprivation in Wickham, however local housing needs</p>

<b>Policy CP19 - Affordable Housing- Quota sites</b>		
	<ul style="list-style-type: none"> <li>• More mid-size family accommodation. 3 beds needed in Wickam.</li> <li>• Approach will lead to an imbalance.</li>   <li>• Need to define quota sites.</li> </ul>	<p>will be taken into account when considering development proposals. In determining tenure mix account will be taken of local needs and the balance of the existing stock, and of any other local issues that may be of relevance. Policy CP18 reflects this and sub-section <i>f</i> could be reworded to make clear other relevant local circumstances will be taken into account. Policy CP17 deals with housing mix, both this and Policy CP19 aim to provide mid-size accommodation.</p> <p>The purpose of the policy needs further explanation and it is suggested that the title be changed to make clear the policy is intended to create affordable housing on market led housing sites.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>1. Policy CP19 to be amended to reflect the findings of the Small Sites Viability Study to make clear that a financial contribution would be an appropriate alternative in lieu of on-site provision on sites of 1-4 units.</li> <li>2. Amend CP19 to make it clear that the economics of provision are material considerations and to make clear that (other than set out above) provision should normally</li> </ol>

<b>Policy CP19 - Affordable Housing- Quota sites</b>		
		<p>be on-site.</p> <p>3. Change policy title and make clear that the intention of the policy is to create affordable housing on market-led housing sites.</p>

**Policy CP20 - Affordable Housing- 'local connection homes'**

<b>Policy CP20 - Affordable Housing- 'local connection homes'</b>		
<b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b>		
<p>The policy appears to extend the concept of rural exception sites and has been appraised from this perspective. Overall the policy is generally positive for SA framework objectives and no significant adverse effects were identified. The Government's recent response to the Taylor Report which considers 'enabling development' should be noted in relation to this policy. 'It is important to clarify that the Government has no intention of allowing market housing to be built on rural exception sites as this would undermine their very purpose.' [The Government Response to the Taylor Review of Rural Economy and Affordable Housing (Department for Communities and Local Government, March 2009)].</p>		
<b>Response no./Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
	<b>Comments on Policy CP20</b>	
	<u>Support Policy CP.20</u>	
4 (Bishops Waltham PC); 13 (Denmead Parish Council); 42 (Wickham PC);	<ul style="list-style-type: none"> <li>• Fully Support</li> <li>• Support HARA relationship</li> <li>• Only form of affordable housing Wickham PC would support. Should be counted towards the quota of development for Wickham.</li> </ul>	The support is noted and welcomed. The intention of the policy is to create more affordable homes to meet local needs, the CLG sponsored Rural Masterplanning projects will inform the levels of housing provided.
	<u>Object to policy CP20</u>	
87 (GOSE); 2116; 90 (English	<ul style="list-style-type: none"> <li>• Are local connection homes intended to be rural exception sites? If so the policy does not</li> </ul>	The Policy is intended to provide rural exception housing and affordable housing on exceptions and

Policy CP20 - Affordable Housing- 'local connection homes'		
<p>Heritage), 123, 2107, 10058, 10060, 10062, 10063, 10178, 10229;10269; 10247; 10254, 10261; 10284; 10289; 10401; 10408; 10411; 10426; 10427; 10440 (Winchester Liberal Democrat City Council Group)</p>	<p>accord with PPS3.</p> <ul style="list-style-type: none"> <li>• Allow market housing on exception sites</li> <li>• Market development should be allowed in Level 1, 2 and 3 settlements.</li> <li>• Local Connection Homes Policy should apply to larger communities.</li> <li>• Not clear why only Level 4 settlements allow enabling development.</li> <li>• 20% enabling too low; lack of evidence; suggest it should be (e.g.) 30%, 40%, 50%; and assessed on case by case basis</li> <li>• Recognise smaller schemes may need more affordable housing.</li> <li>• Recommend no minimum unit threshold</li> <li>• It is not clear whether the policy is in addition to rural exception housing.</li> <li>• If policy is retained, the homes should be in addition to numbers in the SE Plan.</li> </ul>	<p>allocated sites, in larger as well as smaller settlements. However, as currently proposed, enabling development would only be permissible in/adjoining Level 4 settlements, as other settlements are suitable for market housing anyway. It is accepted that Government policy seeks to avoid enabling development on windfall exception sites. Since the publication of the Core Strategy Preferred Option the Council has commissioned research into the potential of this policy to deliver additional affordable housing. Early findings suggest that in its current form the policy is likely to be counterproductive to other exceptions housing schemes, possibly compromising the development of affordable housing on other land related to higher order settlements. It may be that an approach that specifically allocates sites, possibly allowing some enabling development, along with the more traditional rural exception site approach would be a more fruitful approach. Such sites would need to be on land where other residential development would not be permitted and would be likely to involve the release of greenfield sites The percentage of market housing permissible will be defined in policy following further research. No minimum threshold will be defined in policy. The Council has recently been awarded CLG funding to undertake further work around settlement hierarchies and this should also help define the scale, nature and form of development</p>

Policy CP20 - Affordable Housing- 'local connection homes'		
	<ul style="list-style-type: none"> <li>• Sites for affordable housing should be identified at this stage.</li>   <li>• Low cost homes will not provide the necessary financial support. Remove reference</li>   <li>• 100% affordable housing sites should be allowed</li>   <li>• Criterion b only goes part way to achieving sensitive siting and design.</li>   <li>• Mobile homes could be provided and removed when the need reduces.</li>   <li>• Expand definition to include military and or key</li> </ul>	<p>which would be most appropriate for the various rural settlements. This work will help support the detailed revision of this policy.</p> <p>This is too detailed for the Core Strategy. The revised policy may indicate the intention to do this, but any sites can be allocated in the Development Management and Allocations DPD.</p> <p>Further research will help to assess this.</p> <p>The policy allows for 'traditional' 100% rural exception housing as well as other forms of rural affordable housing – the policy wording can be amended to make this clear.</p> <p>The Policy wording is not intended to deal with detailed design issues. Policy CP11 deals with these issues.</p> <p>Current policies allow mobile homes within settlements and on a temporary basis outside.</p> <p>This is too detailed to be a matter for the Core Strategy</p>



Policy CP20 - Affordable Housing- 'local connection homes'		
	<p>worker housing</p> <ul style="list-style-type: none"> <li>• Criteria for defining need should be tightened.</li> <li>• Object to development in unsustainable locations.</li> </ul>	<p>Reference should be made in the explanatory text/glossary to households assessed as in housing need. Referring to specific groups is too detailed a matter for the Core Strategy.</p> <p>This matter will be addressed in the light of advice from the CLG Rural Masterplanning research. Individual proposals will be considered on their merits.</p> <p><b><u>Recommended Approach:-</u></b></p> <ol style="list-style-type: none"> <li>1. Subject to the final findings of the Council's current rural housing study and the outcome of the CLG funded Rural Masterplanning project, the policy should be redrafted to allow for sites to be allocated for rural affordable housing to meet identified local needs, (possibly with a modest market element), adjoining appropriate settlements. Enabling development should not be promoted on windfall exception sites.</li> <li>2. Subject to the results of the same studies the target for 600 Local Connection Homes should be revisited.</li> <li>3. The Policy wording should be redrafted to make it clear that 100% rural exception housing</li> </ol>

Policy CP20 - Affordable Housing- 'local connection homes'		
		<p>sites would still be permissible.</p> <p>4. The explanatory text/glossary should be updated to define housing need by reference to households assessed as in housing need by the local housing authority</p>

**Policy CP21 – Sites for Gypsies, Travellers and Travelling Showpeople**

<b>Policy CP21 – Sites for Gypsies, Travellers and Travelling Showpeople</b>		
<b>Response No./ Organisation</b>	<b>Summary of Key Issues</b>	<b>WCC Officer response Recommended Approach</b>
<p><b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b></p> <p>The SA has identified no adverse impacts and the policy supports a cultural tradition and ensures that all members of society have the opportunity to have appropriate accommodation. There is clear progression of relevant social objectives, whilst key District assets, e.g. cultural and landscape are protected. Reference to relative scale of sites, provision of services and the provision of play space for younger children would improve the policy still further.</p>		
<p>2273, 4 (Bishops Waltham PC), 42 (Wickham PC)</p>	<p><u>Support Policy CP21</u></p> <p>Support CP21. Welcome provision, provided that suitable sites with limited local opposition can be identified. Need to ensure adequate landscaping prior to development.</p> <p>Support the provisions of this policy but there should be a defined limit on the area / number of sites permitted within each parish to ensure provision is evenly distributed throughout the district, rather than a large numbers of sites in a small number of parishes.</p>	<p>The support is noted and welcomed.</p> <p>The identification of suitable sites to meet the District's additional accommodation needs, which will be set out on completion of the Partial Review of the South East Plan, will be guided by a number of factors including, importantly, access to employment and to local services and facilities such as education and medical care.</p> <p>This may mean that certain of the most rural parts of the district, some distance from the nearest local service centres and with limited</p>

<b>Policy CP21 – Sites for Gypsies, Travellers and Travelling Showpeople</b>		
<b>Response No./ Organisation</b>	<b>Summary of Key Issues</b>	<b>WCC Officer response Recommended Approach</b>
84 (GOSE), 86 (Environment Agency), 2176	<p>Comment/Object to Policy CP21.</p> <p>Policy guidance for Gypsies and Travellers is set out in two separate circulars and policy CP21 should reflect both policy requirements. Circular 4/2007 makes it clear that sites for Travelling Showpeople are normally for mixed residential and business use, to enable the effective storage and repair of equipment, which is not currently reflected in Policy CP21.</p> <p>Fully support CP21, as a consistent approach to the provision and design of these sites is necessary. Will expect rigorous standards in foul and surface water drainage provision. PPS23 (Planning &amp; Pollution Control) has a sustainable development focus and should be</p>	<p>public transport, are less likely to be considered suitable. This may also result in a less than absolutely even distribution across the whole District</p> <p>Nevertheless, any site which is identified as being potentially suitable will be subject to consultation with both the local settled communities and with representatives of the travelling communities, in order to ensure an open exchange of information and to avoid misunderstandings or conflicts.</p> <p>The policy should be amended to emphasise the distinctive site and show vehicle accommodation needs of Travelling Showpeople, as recognised and provided for in Circular 4/2007.</p> <p>Site specific issues such as drainage provision and site characteristics, including additional</p>

<b>Policy CP21 – Sites for Gypsies, Travellers and Travelling Showpeople</b>		
<b>Response No./ Organisation</b>	<b>Summary of Key Issues</b>	<b>WCC Officer response Recommended Approach</b>
	<p>referenced in the strategy, particularly in relation to brownfield redevelopment.</p> <p>The vague generality of the preferred strategy would be of little assistance in the determination of individual planning applications. Tynefield is not a particularly sustainable location and in many cases would be found to be less sustainable than the unauthorised sites. The criteria set down in Policy CP.21 are similar to those which would equally relate to traditional housing developments and fail to recognise that gypsies resort to a particular location for many reasons: family links; employment opportunities or; lower land values all of which would apparently be accorded no weight by the local planning authority. Sustainability for a gypsy family is often quite different from the tests set down by the local planning authority. Need to clarify policy and approach taken.</p>	<p>landscaping needs, would be most appropriately considered and dealt with at the Development Management and Allocations DPD stage and any subsequent planning application stage.</p> <p>The Core Strategy's Preferred Option is intended to provide a District-wide strategic framework for meeting the current and projected accommodation needs of Gypsies, Travellers and Travelling Showpeople. The identification, assessment and delivery of sufficient suitable and sustainable sites will be managed through the Development Management and Site Allocations DPD. This will be based on the District's new pitch allocation, following from the finalised Partial Review of the SE Plan and will also take into account the locational needs and preferences of the Gypsy, Traveller and Travelling Showpeople communities.</p> <p><b><u>Recommended Approach:</u></b></p> <p>3. If the Partial Review of the South East Plan is completed in time, revise Policy</p>

<b>Policy CP21 – Sites for Gypsies, Travellers and Travelling Showpeople</b>		
<b>Response No./ Organisation</b>	<b>Summary of Key Issues</b>	<b>WCC Officer response Recommended Approach</b>
		<p>CP21 and its explanatory text to refer to the District's pitch requirements contained in it.</p> <p>4. Amend Policy CP21's explanatory text to clarify the distinctive site requirements of Travelling Showpeople.</p>

**CP22 Retention of local services and facilities**

<b>CP22 Retention of local services and facilities</b>		
<b>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</b>		
<p>The SA demonstrates that this is an effective policy which has benefits for community and social inclusion. There are associated benefits for transport, climate change and pollution if communities are supported through the provision of local facilities and therefore need to travel less distance for essential goods and services. The benefits are likely to be medium to long term and synergistic where support for local facilities provides economic viability for wider goods and service businesses.</p>		
<b>Response no./Organisation</b>	<b>Summary of key issues</b>	<b>WCC officer response and Recommended Approach</b>
4 (Bishops Waltham PC); 42 (Wickham PC); 2273; 3136; 10408	Support the policy	Support noted
89 (Hants CC)	The policy is too inflexible to enable public service providers to respond to evolving service needs	The policy concentrates on retaining facilities in relation to the sustainability of settlements and neighbourhoods – proposals to create new or expand existing facilities will be covered by more detailed policies set out in the Development Management and Allocations DPD.
3104	Need to clarify the word 'local' and whether the policy	The purpose of the policy is to ensure that

<b>CP22 Retention of local services and facilities</b>		
	applies to Winchester Town – need to include retention of cultural and arts facilities.	<p>facilities are retained wherever possible, to serve local communities and help to avoid unnecessary trips by car. It therefore applies to any service/facility, whether this is in an urban or more rural locality. This policy therefore covers all settlements (including Winchester Town) and the surrounding rural area within the District.</p> <p>The list of facilities that the policy covers (para 13.63) already includes cultural and arts facilities.</p>
10440 (Winchester Lib Dem City council Group)	Expand policy to refer to whether the site offers the opportunity to address a shortfall in facilities or services	The policy concentrates on seeking to protect existing facilities and one of the tests to be passed is the need to consider whether the site is suitable for an alternative service or facility which could benefit the local community. This matter is therefore already covered.
3104; 3071	<p>Reference to CP23 in para 13.63 should be CP22</p> <p>Bullet 4 of para 13.63 should also refer to transport infrastructure including public car parking</p>	<p>Agreed</p> <p>The list expressed at para 13.63 needs to be reviewed to ensure that it includes all relevant matters that are intended to be covered by this policy. Some aspects of transport infrastructure can be difficult to monitor in that changes may not fall within the remit of the planning system</p>



CP22 Retention of local services and facilities		
		<p>and therefore be outside the control of the Council. However, specific facilities such as bus/rail stations and public car parks would be considered to fall within the 'infrastructure' category of the list expressed at para 13.63.</p> <p><u>Recommended approach</u></p> <p>To review the policy and supporting text in light of the PINS advice 'what, where, when and how' to ensure that all matters are covered by the policy.</p>