

Statement of Community Involvement 2023

Responses to consultation organised by question.

20 responses in total

Section 1 – Introduction – 11 comments

If you wish to comment on the introduction, please add your comments below

Respondent ID	Comment	Officer response
ANON-T2RT-EWW4-K	A useful introduction, but with no clear objectives and very little information on the responses required.	Comments noted Comments were sought on the content of the SCI. The SCI is a document that describes how the public, businesses and interest groups can get involved in the creation of local planning policy, neighbourhood planning and the planning application decision making process aimed at shaping where we live work and enjoy the natural and built environment. Recommended response: No Change.
ANON-T2RT-EWBQ-U	Where is the community engagement for people who live in the city? No presentation whatsoever for residents who will be directly affected	Comments noted This consultation is open for all residents across the whole of district, including Winchester. This is a consultation on the Statement of Community Involvement

		<p>which is relevant to the whole district. The SCI does not directly impact particular residents. The document sets out how residents will be informed and how they can engage and how the public, businesses and interest groups can get involved in the creation of local planning policy, neighbourhood planning and the planning application decision making process aimed at shaping where we live work and enjoy the natural and built environment.</p> <p>Recommended response: No change.</p>
ANON-T2RT-EWBF-G	None	<p>Comments noted</p> <p>Recommended response: No change.</p>
<p>BHLF-T2RT-EWJY-B</p> <p>The Marine Management Organisation</p>	<p>Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>Kind regards,</p> <p>The Marine Management Organisation</p> <p>Marine Management Organisation Functions</p> <p>The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement,</p>	<p>Comments noted and there are no implications for the SCI.</p> <p>Recommended response: No change.</p>

	<p>marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p>Marine Planning and Local Plan development</p> <p>Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.</p> <p>Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine</p>	
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	<p>planning officer. You can find their details on our gov.uk page.</p> <p>See this map on our website to locate the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our Explore Marine Plans online digital service.</p> <p>The adoption of the North East, North West, South East, and South West Marine Plans in 2021 follows the adoption of the East Marine Plans in 2014 and the South Marine Plans in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.</p> <p>Marine Licensing and consultation requests below MHWS</p> <p>Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a marine licence in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. We have produced a guidance note (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.</p> <p>Consultation requests for development above MHWS</p> <p>If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:</p> <ul style="list-style-type: none">• The UK Marine Policy Statement and relevant marine plan are material	
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	<p>considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the Planning and Compulsory Purchase Act 2004. Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.</p> <ul style="list-style-type: none"> • It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act. • If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application. <p>Minerals and Waste Local Plans and Local Aggregate Assessments</p> <p>If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry. • The National Planning Policy Framework (NPPF), which sets out policies for national (England) construction mineral supply. • The minerals planning practice guidance which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The national and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period, including marine supply. <p>The minerals planning practice guidance requires local mineral planning authorities</p>	
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	<p>to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.</p>	
<p>BHLF-T2RT-EWJ5-7</p> <p>South Downs National Park</p>	<p>In terms of the content of the rest of the document, we were wondering if you wanted to discuss / agree a way forward about consultations for joint planning documents (i.e., neighbourhood development plans (NDP) and village design statements (VDS) etc.) in relation to parishes split between the local planning authority boundaries of the National Park and Winchester City Council?</p> <p>We are due to meet with you at your offices on 29 November 2023 for a duty-to-cooperate (DtC) meeting. Perhaps we can discuss something then. Ultimately, it would be good to agree a sound approach to determine which authority takes the lead for which split parishes, and ensure that any joint public consultations satisfy the requirements of both authorities SCIs.</p> <p>We look forward to discussing further with you.</p>	<p>Comments noted.</p> <p>A meeting has been held and a discussion has taken place with Officers from the South Downs National Park (SDNPA) to discuss where there are split parishes that fall within the National Park and how we can deal with this issue.</p> <p>There is no need to make changes to the SCI as this can be a matter that is agreed as and when the situation occurs.</p> <p>Recommended response: No change</p>
<p>BHLF-T2RT-EWJT-6</p> <p>Natural England</p>	<p>Thank you for your consultation request on the above dated and received by Natural England on 10th October 2023..</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p>	<p>Comments noted and support welcomed.</p> <p>No implications for the SCI.</p> <p>Recommended response: No change</p>

	<p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk This system enables us to deliver the most efficient and effective service to our customers.</p>	
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<p>BHLF-T2RT- EWJS-5</p>	<p>Thank you for consulting Historic England on the latest draft Statement of Community Involvement (SCI) for Winchester. As the Government’s adviser on the historic environment, we are keen to ensure that protection of the historic environment is fully considered at all stages and levels of the planning process.</p>	<p>Comments noted and support welcomed</p> <p>No implications for the SCI.</p> <p>Recommended response: No change</p>
<p>BHLF-T2RT- EWJN-Z</p> <p>National Highways</p>	<p>Thank you for your e-mail dated 10 October 2023, inviting National Highways to comment on Winchester City Council's Statement of Community Involvement (SCI).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>National Highways will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case this relates to the M3 and M27.</p> <p>National Highways recommends that Winchester review the Department for Transport Circular 1/22 ‘Strategic road network and the delivery of sustainable development’ - https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development which summarises the approach through which we engage with the planning system as well as fulfilling our remit to be a delivery partner for sustainable economic growth whilst maintaining, managing and operating a safe and efficient SRN.</p> <p>We would also recommend the recently published “Planning for the Future: A guide to working with National Highways on planning matters”. This document describes the approach we take to engaging in the planning system, and the issues we look at when considering draft planning documents and planning applications. It replaces a</p>	<p>Comments noted</p> <p>No implications for the SCI.</p> <p>Recommended response: No change</p>

	<p>planning guide published in 2015. https://nationalhighways.co.uk/media/2depj2hh/final-cre23_0370-nh-planning-guide-2023.pdf</p> <p>We have reviewed the consultation document and offer no comment at this time.</p>	
BHLF-T2RT-EWJ7-9	<p>Town and Parish Councils paragraphs 1.16-1.18</p> <p>Winchester is the largest settlement in the District but is the only area that lacks any body that represents its views and interests when it comes to making representations to the Planning Committee. The Town Forum which represents Winchester has no role in planning applications (although we note that paragraph 3.25 suggests that the Town Forum can make representations, which we think is not correct), and so there is a significant omission when it comes to ensuring Winchester's views are heard about planning applications in Winchester, particularly where these relate to major developments which have a city wide significance. Consideration should be given to enabling certain Winchester bodies with suitable expertise to be given a similar right to all parish councils to address the Planning Committee when issues relevant to their expertise are a significant part of a planning application.</p>	<p>Comments noted</p> <p>The Town Forum is an important Forum but it is not a statutory consultee and this is not something that the SCI has control over.</p> <p>Officers from the Strategic Planning team have attended the Town Forum meetings to update them on planning policy matters (e.g. Local Design Codes and the Regulation 18 Local Plan) affecting the City of Winchester and they are able make representations to either planning policy or development management applications.</p> <p>Recommended response: No change</p>
BHLF-T2RT-EWJR-4 The Canal & River Trust	<p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to</p>	<p>Comments noted</p> <p>No implications for the SCI.</p> <p>Recommended response: No change</p>

	<p>ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.</p> <p>Waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the city.</p> <p>The Trust has no waterways or infrastructure within Winchester City Council's administrative area, and therefore we would not be a statutory consultee for any planning applications or consultee for policy documents. However, we note that the route proposed for the restoration of the Itchen Navigation runs through the area. We consider that the focus for this should be on preserving the remains of the former Itchen Navigation, and to create an environmental corridor for the benefit of wildlife. We understand that a charity, "The Itchen Navigation Preservation Trust" was being set up (as of March 2023), and we would ask that this body, and other relevant stakeholders to the Navigation, be included in the Statement of Community Involvement.</p>	
<p>ANON-T2RT- EWJU-7</p>	<p>For future reference, we find it confusing that there is a mismatch between the section numbers in the SCI and the section numbers in this consultation document (apart from this first section).</p>	<p>Comments noted</p> <p>Within the Statement of Community involvement, the introduction was not labelled as 'Section 1'. However, as we wanted to ensure that all the respondents could have a say on each part of the SCI, we made sure that the first section people could respond to was the introduction and this was why it was</p>

		<p>labelled as 'Section 1'. Unfortunately, Citizenspace (the Council's public consultation portal) does not allow you to number the sections as this undertaken automatically.</p> <p>Recommended response: No change</p>
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Section 2 - Council Planning Engagement – 9 comments

If you wish to comment on Council Planning Engagement please add your comments below.

Respondent ID	Comment	Officer response
ANON-T2RT-EWW4-K	Winchester City Council has failed to engage with local Parish Councils properly on this.	<p>Comments noted</p> <p>Emails were sent out to all members and Parish Councils and an email was sent to anyone that had signed up to be kept informed on progress on the Local Plan.</p> <p>A Press Release was also sent out and there was an article on the public consultation on the SCI included in Parish Connect. It was also mentioned at Cabinet where the revised timetable for the LDS was agreed.</p> <p>This public consultation on the SCI ran for 6 weeks and this was the opportunity for anyone to have their say on the content on the SCI.</p> <p>Recommended response: No change</p>
ANON-T2RT-EWBT-X	It appears that there are no facilities for people that aren't able to engage online, how do you plan to include people that are unable to use the internet?	<p>Comments noted</p> <p>As the City Council has declared a climate emergency. This means that we need to reduce as much paper and</p>

		<p>printing as possible. However, we know that not everyone in the district has access to the internet.</p> <p>We do however produce paper copies of our planning policy documents and these can be made available on request. The Regulation 18 Local Plan was made available at local libraries as well as the main Councils City Offices. In the reception area of the City Council offices members of the public are able to use the computers if they do not have access to the internet at home.</p> <p>Recommended response: No change</p>
<p>ANON-T2RT-EWBF-G</p>	<p>2.21 leave in the proposed deleted lines about case officer contact details. It is always helpful to be able to clarify application points directly with the case officer.</p> <p>At our last PCC meetings Councillors asked me to convey that they think the planning process doesn't really listen to Parish Council views. They are of the opinion that it is process driven irrespective of the effects decisions can have on the community.</p> <p>Deleting key contact points of contact which are regularly needed for clarification and understanding how Case Officers are considering applications is very important.</p>	<p>Comments noted</p> <p>The case officer's number was only removed from the SCI. Anyone who submits a planning application will still be given the direct and specific contact details of the officer dealing with their case including their email address and their telephone number.</p> <p>In addition to this, the officer contact details will still be provided on all site notices and are also available on the Winchester City Council website.</p>

		<p>As the SCI lasts for 5 years before it needs to be updated this means that the contact details could change within this timeframe which is another reason to remove these contact details from the SCI.</p> <p>Recommended response: No change</p> <p>Comments noted</p>
ANON-T2RT-EWJH-T	<p>2.10 page 7</p> <p>‘Town & Parish Councils can request that an application is determined at WCC Planning Committee if their response raises relevant planning considerations which are contrary to the planning officers’ recommendation.’</p> <p>The Committee feels that the suggested amendments to the SCI diminish the power of the parish council to refer the matter to the WCC Planning Committee.</p> <p>Examples of applications that did not go to WCC planning committee as requested by NATC are case numbers 23/00518/PNDMCD, Forge Works, The Dean (where there are only 6 parking spaces and not 9 as per WCC parking standards and 23/00429/HOU, 52 Jacklyns Lane.</p>	<p>This particular point is included in the Council’s constitution. Parish Councils are still able to call planning applications to Planning Committee.</p> <p>The Council’s constitution is reviewed at different intervals to the SCI.</p> <p>Here is a link to the council’s constitution: Complete constitution version with bookmarks.pdf (winchester.gov.uk)</p> <p>Recommended response: No change</p> <p>Comments noted</p>
ANON-T2RT-EWJC-N	<p>Para 2.3 (page 6) states that the Council must take account of any representations made and in para 3.17 (page 19) regarding local plans the document says that feedback should be provided.</p> <p>In a recent legal case (Watton and Cameron versus Cornwall Council October 2023) the judge made some very important observations about what a council should do with comments from the public. In this particular case the issue was the way the Council addressed the objections of local residents and a parish council to a planning application, or more precisely how they did not.</p>	<p>Comments noted</p> <p>This comment appears to relate to the Local Plan Reg 18 representations. We are still analysing and reviewing the regulation 18 responses and we will be publishing them when we have completed the review and made any necessary changes to the policies and</p>

	<p>In the context of this SCI please could Winchester City Council include in it a commitment (not a should but a will) to provide clear responses to the submissions made on policy documents and on planning applications such that the person who submitted them can understand the course of action adopted by the Council.</p>	<p>supporting information as part of the next stage of public consultation (Regulation 19).</p> <p>Recommended response: No change</p>
ANON-T2RT-EWBA-B	<p>1.18 p6 and 3.34 p33 The SCI permits Parish Councils the opportunity to attend and participate at the Planning Committee Meetings, but this boils down to three minutes speaking time, the same as members of the public, after the objectors. Couldn't Parish Councils have first place in the queue and a longer speaking time? They are specific consultees and have extensive local knowledge. At least there is the chance to answer members' questions.</p>	<p>Comments noted</p> <p>The time that a speaker is given at Planning Committee is not determined by the SCI. This is decided and agreed by the Council's public speaking rules and is not something that the SCI is able to review.</p> <p>Recommended response: No change</p>
BHLF-T2RT-EWJP-2	<p>I make these representations on the consultation draft of the Statement of Community Involvement (SCI) on behalf of Winchester College.</p> <p>The College has had a very productive relationship with the local planning authority over the years which has led to the delivery of a number of high quality schemes for the benefit of the school and city alike. It is for this reason that the College is keen to ensure that the proposals in the draft SCI do not dilute the ability for the College to engage directly with the relevant case officer once a planning application has been submitted.</p> <p>In the section entitled 'Communicating with the Council', it is noted that the text on contacting the case officer at paragraph 2.21 is proposed for deletion without any alternative proposals for engaging with the case officer. It is essential that case officer contact details are provided once an application has been registered so that they can be readily contacted in a timely manner. It would adversely affect the planning determination process if these details were not made available on the public access system and on letters to applicants.</p>	<p>Comments noted</p> <p>The case officer's number was only removed from the SCI text itself. Anyone who submits a planning application will still be given the direct and contact details of the officer dealing with their case.</p> <p>In addition to this, specific officer contact details will still be provided on all site notices and are also available on the Winchester City Council website.</p> <p>As the SCI lasts for 5 years before it needs to be updated this means that the</p>

		<p>contact details could change within this timeframe which is another reason to remove these contact details from the SCI.</p> <p>Recommended response: No change</p>
BHLF-T2RT-EWJ7-9	<p>Consultees paragraphs 2.10 and 2.11 and Appendix 2</p> <p>Civic societies are not referenced as bodies to be consulted and there is no mention of the City of Winchester Trust in the category of general consultees. We note that WinACC, another relevant charitable organisation, is included. Can the Trust be added to the list please and there may be others such as the Winchester BID which ought to be included.</p>	<p>Comments noted</p> <p>TCPA general procedure orders decides who are statutory consultees and not the SCI (this is the first table in Appendix 2). There is a second table in Appendix 2 which includes examples of general consultees which is not intended to be exhaustive. For completeness we have added the City of Winchester Trust to this table. In any event as part of our Local Plan consultation we would consult the City of Winchester Trust as a local amenity group</p> <p>Recommended response: No Change</p>
ANON-T2RT-EWJU-7	<p>P4 para 1.9-1.11</p> <p>We believe that these paras, and in particular Para 1.10 need to contain a more specific guidance as to when there will be consultation on the preferred options for development, with these options substantiated by a strong evidence base.</p> <p>NPPF paras 39-42 makes clear the importance of early and timely consultation for good outcomes in the application process. We believe that the same applies to policy formulation.</p>	<p>Comments noted</p> <p>The timetable for the consultation on the Local Plan is set out in the Local Development Scheme – this identifies when the Council will consult on for example, where development will take place Local Development Scheme 2023 - Winchester City Council</p>

	<p>In the City Council's plan-making process to date there has been one consultation. This was commendably early in the process, but as a result high level and non-specific. It set out a series of strategic options for the approach to new housing provision, but did not identify which was the preferred option, and did not identify where within the district it was proposed to site any new housing development, with the reasons for this choice.</p> <p>There is currently only one further consultation process allowed for (reg 19 consultation). If the consultation on preferred options for development only takes place at this stage then this will not allow for any consultation on the soundness of the City Council's proposed plan.</p> <p>An important aspect of the soundness of the plan will be that it shows how consultation on the draft of the proposed preferred options for development have been taken into account in the preparation of the final plan. Not to have a consultation which allows for scrutiny of this is unsound, and is likely to cause problems for the plan at the EiP stage. See also comments on section 2.</p>	<p>Consultation has taken place on the Strategic Issues & Priorities Document between 15th February and 12th April 2021. Public consultation on the Regulation 18 Local Plan took place between 2nd November and 14th December 2022. The LDS sets out that public consultation will take place on the Regulation 19 Local Plan in August/Sept 2024. The Reg 18 Local Plan did identify the sites that we were allocating for development.</p> <p>Recommended response: No change</p>
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Section 3 - Planning Policy – 9 comments

If you wish to comment on Planning Policy please add your comments below.

Respondent ID	Comment	Officer response
ANON-T2RT-EWWT-K	<p>Background. I live in Woodmancott, Winchester a very small rural community. Both my neighbours and I (we are both getting older) wanted to downsize and release equity from our houses. Our house Dunley has an annex and over coffee one day ,we came up with the plan to split the house from the annex and make 2 more affordable houses, one for each of us, allowing us both to stay in the village we love (I am Church Secretary my neighbour is Church Warden, we have lived for 20 and 50 years respectively in Woodmancott). WCC have refused our planning application. So when I read in this document HOMES for ALL - it really makes me laugh! In the Government NPPF it clearly states that: 79. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply: * d) the development would involve the subdivision of an existing residential building; This is Exactly what we wanted to do, but this is Not reflected anywhere in WCC planning policy! In WCC Strategic plan it states: Vision :The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs. Once again by refusing our planning application in Woodmancott for Dunley, I would say that whilst your "vision" clearly says this, this is not supported by Planning Officers, as was our case Our planning application was turned down on the basis of "infill" and whilst infill is supported in Woodmancott, we were told that because we wanted to separate the</p>	<p>Comments noted</p> <p>This public consultation is for the Statement of Community Involvement 2023.</p> <p>This comment is relevant to a planning application and is not applicable to the SCI consultation. The SCI sets out how we will consult on the Local Plan and the development management applications rather than how they are determined.</p> <p>Recommended response: No change</p>

	<p>annex from the main house this was then deemed " on the side" and not infill. The annex is already built! We were not building any walls further into the countryside - the boundary of the annex is already there - built! We did want to do a small extension at the back, as at the moment the annex is only one bedroom. Which brings me onto my second point - affordable housing. WCC strategic plans states Delivering Affordable Housing Policy H7 9.54 The SHMA (Strategic Housing Market Assessment) refers to the presence of a high proportion of larger detached houses within the rural area, when compared to the district as a whole. There is a particular bias towards houses with 4 or more bedrooms and a correspondingly lower percentage of smaller (1-3 bedroom) properties. Particularly in the countryside, where new housing is generally inappropriate, the loss of smaller dwellings is difficult to rectify. There is a need to retain the limited existing stock of smaller dwellings that do exist in the countryside and it is therefore important to apply policies to achieve this. p246 I wanted to split my large 6 bedroom house into a 3 bed house and a 1 (to be turned into 3 bed) bed house. Exactly what your policy says, 2 more affordable houses as opposed to one large very expensive one. Another reason why I feel very aggrieved when I read your document and another example in my experience, where WCC is not following its own rules! If you do take the time to look at my planning application with regard to what I have written here, you will see we also applied to build a garage on agricultural land, which I knew at the time, wouldn't probably be approved, even though it would have been a very sympathetic and attractive building. I was willing (and have an email to prove this) to forego the garage and change my application if this would have allowed planning to go through. I am no authority on town planning. I am just one of your countryside constituents who love where they live and wanted, if possible, to retire and stay where they loved living. We had lots of letters of support from the village and could have easily obtained more letters had we needed to.</p>	
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	<p>This refusal will probably mean both my neighbour and I having to move from Woodmancott, as there are no smaller houses in the village for us to downsize to. I feel WCC planning policy is outdated, that in my opinion does not follow the NPPF with regard to rural countryside dwellings and although you purport Homes for All "to accommodate changes to support the evolving community" this is definitely not the case in my experience.</p> <p>I love, greatly respect and would definitely not want rural land being defaced, built over in any way, but WCC have to be more flexible in their approach to rural planning applications.</p> <p>To take each application on a case by case basis and I feel that their policies should reflect this.</p> <p>It is no good writing a glossy document promising WCC are listening and responding to the very varied needs of the communities in which they serve, when quite clearly they are not!</p> <p>I am afraid I would say WCC are rigid when it comes to planning applications. It felt very much that without much consideration for the local communities needs, our letters of support were totally ignored, no common sense applied or without any real logical explanation (the fact being the annex is already built - the two dwellings are already there, we just wanted to remove the link!) our planning application was refused.</p>	
ANON-T2RT-EWW4-K	I believe that Winchester City Council's Planning Policy is relatively sound, with a lot of information on Bio Diversity and Habitat and lots of information on precisely what is to be built and where.	<p>Comments noted and support welcomed</p> <p>Recommended response: No change</p>
ANON-T2RT-EWBF-G	<p>3.15 leave in</p> <p>Newsletter & Leaflets can also be used to publicise events or meetings and to be widely available. Communication is key.</p> <p>Local Plan exhibitions leave in the proposed deleted "and public meetings". Again communication is key</p>	<p>Comments noted</p> <p>The Council has declared a climate emergency and we are doing our part to reduce printing and waste. Many Parish Councils prepare leaflets/newsletters when appropriate As part of the public consultation on the Local Plan, Parish Council's were provided with text and</p>

		<p>images that they were able to include in their publications.</p> <p>Recommended response: No Change</p>
ANON-T2RT-EWBE-F	<p>Neighbourhood Plans (p25)</p> <p>The consultation outlines the importance of Neighbourhood Plans, when it comes to the council taking into consideration the view of local communities when it comes to planning and developing their towns and/parishes.</p> <p>Crawley Parish Council was asked to produce a Village Design Statement (VDS) as part of the New Local Plan consultation. There is no mention of the role of village design statements in this consultation. I would like some clarity that a VDS is a valid document that will be taken into consideration when planning applications and the revised Local Plan is implemented. If this is not the case, Parish Councils need clearer direction on the need to produce a Neighbourhood Plan. In the past, I believe only larger Parishes were asked to produce a Neighbourhood Plan. This needs clarity, and the role of VDS needs to be recognised within the revised SCI document.</p>	<p>Comments noted</p> <p>The City Council is currently working with a number of Parish Council's on updating their Village Design Statements. The representation appears to be referring to the role of VDS's which are taken into account by Officers when they are determining a planning application. Before VDS's are adopted by the City Council they need to undergo various stages of public engagement.</p> <p>Recommended response: No Change</p>
ANON-T2RT-EWJC-N	<p>Para 3.17 (page 19) - As above, please could Winchester City Council include in it a commitment (not a should but a will) to provide clear responses to the submissions made on policy documents and on planning applications such that the person who submitted them can understand the course of action adopted by the Council.</p>	<p>Comments noted</p> <p>This comment appears to be regarding the Local Plan Reg 18 representations. We are still analysing and reviewing over 3,400 comments we received during the Regulation 18 public consultation and we will be publishing them when we have completed the review and made any necessary changes to the policies and supporting information when we consult on the Local Plan (Regulation 19).</p>

		Recommended response:
ANON-T2RT-EWBA-B	<p>2.9, fig.3, p15 Given what is proposed for South Wonston (the planning boundary change) in the developing Local Plan, the Parish Council's input at key stage 18 was vital (objection). It looks as if it will be trickier to raise this issue again at later stages. The Parish Council expects to have to go through the whole case again whenever the responses to the first consultation are finally analysed, if this is permissible, and it will, because this unexpected change is simply unacceptable.</p>	<p>Comments noted</p> <p>This comment relates to the Local Plan proposed boundary change to South Wonston settlement boundary which was consulted on as part of the Regulation 18 Local Plan. We are currently analysing the representations we received during the Local Plan Reg 18 consultation. Once these are published there will be another chance to feedback and have your say on any proposed changes that have been made at Regulation 19 stage before the Local Plan goes to an independent examination.</p> <p>Recommended response: No change</p>
ANON-T2RT-EWJQ-3	<p>3.4 – documents which form the basis of allocation of units in a particular parish were not fully consulted on and challenges where not adequately addressed. In particular the Facility Scoring Methodology. No transport studies appear to have been considered or consulted on prior to housing target given to individual parishes.</p> <p>3.5 The WCC plan timetable consistently slips, but the same regard is not given to parishes and residents and no consideration is given to greater deeper consultation.</p> <p>3.7 – Figure 1 – It is appropriate given the current financial climate that Cil funding automatically given to Parishes be reconsidered and consulted on.</p> <p>3.14 – Only comment is that this section has been completely rushed during this local plan consultation and communities given very little time to respond.</p>	<p>Comments noted</p> <p>This response appears to relate to the Reg 18 consultation and not the content of the SCI.</p> <p>CIL funding is not linked to the Statement of Community Involvement.</p> <p>The Regulation 18 draft Local Plan consultation covered 6 weeks and took place between 2nd November and 14th December 2022. The public consultation involved several drop-in sessions in</p>

	<p>3.21 Regulation 18 consultation feedback has still not been received</p>	<p>towns and villages across the district supported by posters, a social media, radio and news-print advertising campaign. Online briefings with experts speakers were organised and sessions at local colleges and universities also took place.</p> <p>We are still analysing and reviewing over 3,400 comments we received during the Reg 18 consultation and we will be publishing them when we have completed the review and made any necessary changes to the policies and supporting information as part of the next public consultation (Regulation 19).</p> <p>Recommended response: No change</p>
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<p>BHLF-T2RT- EWJS-5</p> <p>Historic England</p>	<p>We broadly support the SCI and welcome reference to Historic England in Appendix 2 as a specific statutory consultee and a Duty to Cooperate prescribed body.</p> <p>We recommend one minor change that would, in our opinion, add clarity to the SCI. The text in paragraph 3.30 could be simplified as follows, also taking into account the environmental objective of the NPPF paragraph 8: “Conservation of the built, and natural and historic environments, including impact on the historic environment”.</p> <p>The current wording risks implying an approach that conserves the built and natural environment, but perhaps takes a different approach to the historic environment, which we realise is not the intention.</p> <p>With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that we should be consulted on draft plans where our interests are considered to be affected. Our published advice on neighbourhood planning can be found at: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p>	<p>Comments noted and support welcomed</p> <p>Recommended response: An amendment has been made to wording of the SCI.</p>
<p>ANON-T2RT- EWJU-7</p>	<p>Section 2 page 15 para 2.9, 2.20-24</p> <p>The figure 3 shown after para 2.9 is presumably from PAS or other central government recommendations. It correctly indicates the need for 3 rounds of public consultations during the pre-submission phase of the local plan.</p> <p>1 At the initial stage reg 18, 2 At the draft DPD stage 3 At the submission stage reg 19</p> <p>Paras 2.20-24 set out the consultation proposals for the draft DPD stage noting that 'this stage is the opportunity to make representations on draft plans and proposals'.</p> <p>The local plan website indicates a programme that is at variance with this. Instead</p>	<p>Comments noted</p> <p>1 At the initial stage reg 18, - SIP consultation</p> <p>2 At the draft DPD stage – Regulation 18 draft local plan (DPD) (currently reviewing and analysing the responses to this consultation)</p> <p>3 At the submission stage reg 19 will be undertaken in late 2024</p> <p>For more detail on all the consultations and stages of our Local Plan please visit our</p>

	<p>you propose telescoping the draft DPD and reg 18 consultations into one consultation.</p> <p>As noted in our comments on paras 1.9-1.11 (which also apply to this section) your reg 18 consultation did not contain draft proposals on where development should take place. This omission means that there is no 'opportunity to make representations on draft plans and proposals' allowed for in your programme. This risks making your process unsound..</p> <p>We believe that you should bring your local plan programme into line with your SCI and allow a further consultation process.</p> <p>As an alternative you could amend your SCI by omitting figure 3 and deviate from the recommendations it embodies, in order to match your programme. You would also have to re-structure paras.2.9, 2.10, 2.11 and Paras 20-24 to do this.</p> <p>In this case we believe you should explain why providing a lower level of consultation than that set out in the recommendations of figure 3, still provides a sound plan-making process. We suggest you will find it hard if not impossible to do this.</p>	<p>website here: The Local Plan - Winchester District Local Plan</p> <p>We have completed two public consultations on the Local Plan and will be undergoing another round of formal consultation as part of the Reg 19 Local Plan. Which is in accordance with the regulations set out in the representation opposite.</p> <p>The Regulation 18 draft Local Plan Consultation lasted for 6 weeks and took place between 2nd November and 14th December 2022. This involved several drop-in sessions in towns and villages across the district supported by posters, a social media, radio and news-print advertising campaign. Online briefings with experts speakers were organised and sessions at local colleges and universities also took place.</p> <p>We are still analysing and reviewing over 3,400 comments we received during the Reg 18 consultation and we will be publishing them when we have completed the review and made any necessary changes to the policies and supporting information as part of the next public consultation (Regulation 19).</p> <p>Recommended response: No change</p>
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Section 4 - Development Management – 11 comments

If you wish to comment on Development Management please add your comments below.

Respondent ID	Comment	Officer response
ANON-T2RT-EWW4-K	This seems sound.	Comments noted Recommended response: no change
ANON-T2RT-EWBT-X	4.32 The number of comments made by local people is a useful indicator of the strength of feeling about an application and should be retained as a means of having an application heard by the Planning Development Committee rather than a delegated decision. The hyper link takes you to the constitution but not to the relevant pages for the scheme of delegation	Comments noted This matter is set out in the constitution and is beyond the remit of the SCI. If there are 6 or more responses to a planning applications, it automatically goes to Planning Committee. Can be found in section 3.4 para 7.8 a (v) here: Complete constitution version with bookmarks.pdf (winchester.gov.uk) Recommended response: No change
ANON-T2RT-EWBF-G	4.3 Leave in the proposed deleted section to ensure a dedicated line is available for planning enquiries. This is an important area for applicants before completing an application form and can also avoid additional paperwork for planning staff. 4.32 Leave in the deleted section1-6 for clarity and ease of communication. 4.34 please consider reviewing the time Parish Councils get to present to the planning committee. Ward Councillors get 5 minutes and the local councillors are restricted to 3 minutes when their knowledge of the local issues is often greater.	Comments noted The case officer's number was only removed from the SCI text itself. Anyone who submits a planning application will still be given the direct and specific contact details of the officer dealing with their case.

		<p>In addition to this, specific officer contact details will still be provided on all site notices and are located on our Winchester City Council website.</p> <p>As the SCI lasts for 5 years before it needs to be updated this means that the contact details could change within this timeframe which is another reason to remove these contact details from the SCI.</p> <p>The time that speaker are given is not determined by the SCI. This is decided and agreed by public speaking rules and is not something that the SCI is able to review.</p> <p>Recommended response: No change</p> <p>Comments noted</p>
ANON-T2RT-EWBE-F	<p>Retrospective Planning Applications (p34 to 39). - There was not enough on this.</p> <p>I cannot find anything that is easy to understand on the process of managing Retrospective Planning Applications. It can happen that Parish Councils are asked to comment on retrospective applications. It would be good to have a clearer idea of the processes and contacts available to the Parish Council when commenting on this type of application and ensuring the local community has the opportunity to make their comments heard. It can appear that retrospective planning applications are an easy route to just “getting things through” the application process. This needs discouraging.</p>	<p>All planning applications whether retrospective or not are considered in the same way. The fact that it is retrospective has no bearing on the planning process or the determination of an application.</p> <p>The Council’s Local Enforcement Plan explains how the council deals with development that has been undertaken</p>

		without the benefit of planning application. Recommended response: No change Comments noted
ANON-T2RT-EWJC-N	<p>Para 4.32 (page 36): Delegated decision specifics for a decision when an application goes to the planning committee are replaced with a link to the WCC constitution. This is a link to a meeting where it is not clear where the delegated decision for moving to committee is contained.</p> <p>The previous version of the SCI document is much better documented to show the situations when a planning committee will be held. Please reproduce the detail from the various sections of the constitution so that the information is really clear.</p>	<p>This is set out in the Council's constitution, and therefore not repeated here. The constitution is reviewed at different intervals to the SCI.</p> <p>Here is a link to the council's constitution: Complete constitution version with bookmarks.pdf (winchester.gov.uk)</p> <p>Recommended response: No change</p>
ANON-T2RT-EWBA-B	<p>3.18 p29 The Parish Council has occasionally found that the orange site notice is missing, so while the council is notified, residents who are not neighbours may be deprived of information about issues in their community.</p> <p>3.38 p33 The Parish Council has no right of appeal regarding applications permitted by Winchester City Council. This was rejected by the Government when a petition was presented to Parliament in 2017, on the grounds that it was wrong to be able to delay a development at the last minute. The Parish Council hopes its representation regarding its housing allocation will be deemed valid by those who have the power of decision.</p>	<p>Comments noted If we are notified that a site notice is missing, the Council will arrange for it to be replaced.</p> <p>TCPA general procedure order sets out the statutory notification requirements for planning applications.</p> <p>Recommended response: No change</p>
ANON-T2RT-EWJQ-3	<p>4.12 – The Parish Council is not aware this happens</p> <p>4.13 – A mechanism process is required to ensure this happens. It would be very beneficial to the Community and welcomed.</p> <p>4.32 – The Parish Council feels that this section should remain in this document and</p>	<p>Comments noted</p> <p>The Council adopted its approach to Concept Masterplanning on 21/06/2023 which can be found on the Local Plan</p>

	<p>not be removed and put solely in the constitution. 4.34 stays in so it the benefit of removing it is not clear and seems at odds with the other planning processes and procedures which stay in.</p>	<p>website, linked here: Local Plan Master planning approach to concept masterplans.pdf</p> <p>This is set out in the Council's constitution, and therefore not repeated here. The constitution is reviewed at different intervals to the SCI.</p> <p>Here is a link to the council's constitution: Complete constitution version with bookmarks.pdf (winchester.gov.uk)</p> <p>Recommended response: No change</p>
<p>BHLF-T2RT-EWJP-2</p>	<p>Paragraph 4.27 sets out the Council's proposals for assessing applications. Again, the text confirming</p> <p>that the case officer can be contacted to discuss applications is proposed for deletion with the onus now being on the case officer to engage with the applicant. Withdrawing the ability for the applicant to contact the case officer is of serious concern to the College and will inevitably lead to delays in the processing of planning applications. This is considered a retrograde step and will run counter to the NPPF requirement for local planning authorities to work proactively with applicants and the requirement in PPG for SCIs to ensure effective community involvement at all stages of the planning process.</p> <p>Not only would the College wish to see the current text on the ability to contact the case officer during the determination process retained, but it would also request that the SCI includes timescales for responding to emails and voicemails to enable the timely determination of planning applications.</p> <p>Under the section entitled 'Planning Performance', it is proposed to include reference to concept</p>	<p>Comments noted</p> <p>The case officer's number was only removed from the SCI text itself. Anyone who submits a planning application will still be given the direct and specific contact details of the officer dealing with their case.</p> <p>In addition to this, specific officer contact details will still be provided on all site notices and are located on our Winchester City Council website.</p> <p>As the SCI lasts for 5 years before it needs to be updated this means that the contact details could change within this timeframe which is another reason to</p>

	<p>masterplans. It is not clear whether this should be interpreted as all applications which are the subject of a Planning Performance Agreement (PPA) must be accompanied by a concept masterplan (the draft makes it clear that any application accompanied by a concept masterplan must be accompanied by a PPA) or what the threshold would be for requiring a concept masterplan.</p> <p>Paragraph 4.8 includes a link to the governance process for the concept masterplans (Cabinet meeting minutes from 21st June 2023) which refers to the Regulation 18 draft local plan and emerging strategic Policy D5 in particular. The draft policy includes a requirement for a concept masterplan for proposals for significant development on sites occupied by major landowners /users.</p> <p>Irrespective of the above, further clarity is required in the SCI on precisely when a concept masterplan is required (e.g. what constitutes a significant development), and what the specific consultation requirements would be. As the production of an SCI is a statutory requirement, it is not appropriate for details on a key element to be included in a separate document.</p>	<p>remove these contact details from the SCI.</p> <p>The Council adopted its approach to Concept Masterplanning on 21/06/2023 which can be found on the Local Plan website and is linked here. It is only required on significant applications: Local Plan Master planning approach to concept masterplans.pdf</p> <p>The City Council will determine whether a development site qualifies as Significant Development. We therefore encourage early engagement to determine if a development site requires a concept masterplan as part of any pre-application engagement. For more information please go to our website: Concept Masterplanning - Winchester City Council</p> <p>Recommended response: No change</p>
<p>BHLF-T2RT-EWJ7-9</p>	<p>Development Management</p> <p>General Approach paragraph 3.</p> <p>While it is to be welcomed that the customer is to be placed at the heart of the process, it would be helpful to give examples of who the customer is. Besides the applicant there are neighbours (both residential, commercial and others), objectors, supporters and perhaps others.</p> <p>Paragraph 3.8 Concept Masterplan</p>	<p>Comments noted</p> <p>Noted – this is valued point and will be included in the glossary of Regulation 19 Local Plan and reference to concept masterplan will be included in the Reg 19 Local Plan</p> <p>The Council adopted its approach to Concept Masterplanning on 21/06/2023</p>

	<p>Concept masterplans are a new stage for big planning applications. This document refers to them briefly and insufficiently. While their intention may be worthy, one thing is emerging at this stage.</p> <p>There is insufficient understanding of the process by the public who seem to be ignored after the developers have conducted their informal consultations, with no feedback or understanding of how the proposals are evolving. The process also seems to require close co-operation between developer and the planning authority, again without involvement of the concerned public. This seems likely to result in a reduction in the significance of the planning application process, the role of the planning committee and alienation of the public.</p> <p>Pre-submission Consultations paragraphs 3.12 and 3.13</p> <p>This is an important part in the planning management process. It would be helpful for those not familiar with the process if an explanation is included of what is meant by the word ‘pre-submission’.</p> <p>Aspects of pre-submission work well but it is important for it to include an iterative element. There should be a response from the developer to all the comments submitted to them, explaining what has changed as a result of the comments. Where those aspects of the proposals which were opposed but are retained, an explanation should be given for this.</p> <p>Notifications paragraphs 3.17 – 3.22</p> <p>We note in paragraph 3.18 that it is at the discretion of the planning officer which neighbouring properties are notified by letter of a planning application. In urban areas it is important to be aware that properties in neighbouring streets to the rear may be affected, besides properties in the same street, and that these are notified as well.</p>	<p>which can be found on the Local Plan website and is linked here. It is only required on significant applications: Local Plan Master planning approach to concept masterplans.pdf</p> <p>The City Council will determine whether a development site qualifies as Significant Development. We therefore encourage early engagement to determine if a development site requires a concept masterplan as part of any pre-application engagement. For more information please go to our website: Concept Masterplanning - Winchester City Council</p> <p>The Town Forum is an important Forum but it is not a statutory consultee and this is not something that the SCI has control over. The Town Forum can make representations, there is no change to this.</p> <p>Officers from the Strategic Planning team have attended the Town Forum meetings to update them on planning policy matters (e.g. Local Design Codes and the Regulation 18 Local Plan) affecting the City of Winchester and they are able make representations to either</p>
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	<p>It used to be standard procedure to include on the planning application website the list of properties that have been notified of the proposal. This is a useful way of knowing to what extent there has been community involvement. We ask that this is reinstated.</p> <p>Commenting on Applications paragraphs 3.23 – 3.26</p> <p>For those like the Trust which monitor planning applications regularly, it would be helpful if applicant’s plans are required to include the relevant details of any adjoining properties such as their elevations and distance from the applicant’s site. This would enable an informed view to be taken of the impact of the proposed development.</p> <p>We have mentioned above that we do not think the Town Forum has any role in making representations about planning applications, contrary to what is stated in paragraph 3.25.</p> <p>Planning Committee paragraph 3.34</p> <p>This states that public speaking at planning committee is encouraged but this unqualified statement ignores the strict time limits of 3 minutes for all objectors and applicants that are applied which mean that speaking is severely restricted. This should be explained if these restrictions are to continue.</p>	<p>planning policy or development management applications.</p> <p>The time that speaker are given is not determined by the SCI. This is decided and agreed by public speaking rules and is not something that the SCI is able to review.</p> <p>Recommended response: No change</p>
ANON-T2RT-EWJX-A	<p>I wish to comment on this Statement by using a recent scenario which I think demonstrates in real terms where issues arise & areas for improvement. I refer to the newly introduced Masterplan Governance, the associated PPA within this governance, & specifically to the approved Bushfield Concept Masterplan. These were both agenda items at the Cabinet meeting of June this year and were approved in succession of each other.</p> <p>During the Public Participation & representations at this meeting, it was raised that a key stakeholder (residents association) had not been engaged with as part of the public consultation for the Bushfield Masterplan. I note that residents associations</p>	<p>Comments noted</p> <p>The SCI sets out how Winchester City Council will engage with the public and other interested parties within the planning system. The SCI does sets out how we would like everyone to engage with people during the planning process. We can and do encourage developers</p>

	<p>are recognised within this draft of the SCI as stakeholders.</p> <p>How was this not detected by WCC officer's before the meeting & decision day to inform the report for & recommendation given for The Bushfield Concept Masterplan?</p> <p>Why was this issue not investigated further once it had been flagged (which would have been in the spirit of this Community Involvement Statement) & the concept masterplan for Bushfield then approved regardless?</p> <p>What impact did this knowledge have on how the Bushfield Masterplan PPA has since been monitored/assessed/handled, since it falls short of what the Statement of Community Involvement sets out to achieve? Particularly given this is such a significant development which will impact many of Winchester's population. I feel this recent situation has tested this Statement of Community Involvement, as it stands & as proposed, & has highlighted, though this document (& the Masterplan PPA) are in place, that it has been ineffective in achieving what it sets out to do in terms of genuine community involvement.</p> <p>Given this recent experience & specific example, in summary my comments are: how can this Statement of Community Involvement ensure that it achieves what it sets out to do, remedies this occurrence, & others like it, & avoids disenfranchising the community & ensures they have confidence in their local authority.</p>	<p>and other parties to engage with the public and interested bodies to the same high standard that we do. The developers of Bushfield camp have undertaken extensive public engagement prior to the submission of the planning application, including the parameters of the masterplan.</p> <p>Recommended response: No change</p>
<p>ANON-T2RT- EWJU-7</p>	<p>Page 27 Pre-application paras 3.10-3.14. We suggest that the NPPF para 39 could usefully be cited in this section.</p> <p>The NPPF para 39 says: Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.</p> <p>As a Parish Council we firmly agree with this.</p>	<p>Comments noted</p> <p>The SCI does not deal with non-material amendments.</p> <p>The local validation list sets out the information that is normally required to be able to register, assess and determine a planning application. The local validation list requires that it is</p>

	<p>Furthermore, being aware of the pre-consultation process early on is essential for Parish Councils' engagement. Being involved at the pre-application stage enables us to contribute our local knowledge at the right time in the process, when it can be a positive input and not a disruptive one.</p> <p>It is unrealistic, in a district as geographically spread as Winchester, to rely on planning officers being able to thoroughly understand the constraints of every site in their patch. Parishes have a valuable role in 'filling in the gaps'.</p> <p>We appreciate that a well-prepared Planning Design and Access Statement will allow for applicants to set out their analysis of site constraints. However this analysis will be prepared in order to argue the applicants' case, so it cannot be relied on to be objective.</p> <p>We accept that there is a balance to be struck between the necessary confidentiality at the extreme early stages of design development, and the transparency which the NPPF identifies as a desirable objective of the planning process.</p> <p>The "extreme early stages" can be defined as when the applicant is preparing preliminary ideas about their brief. This could include investigating the planning legislation in terms of the high-level planning policies which may apply to the principle of the proposed development. This is roughly equivalent to stage 0 in the RIBA Plan of Work (which has the planning application at the end of stage 3). In the initial stage it may not, on balance, be necessary to engage with the local community.</p> <p>Once this early stage is complete, the evolution of proposals for a site should move to the analysis of site constraints and then on to scheme design. In line with NPPF (para 39), it would surely be beneficial to have all of the site constraints identified and agreed, and the scheme design discussed, with the local community at this stage.</p> <p>If any conflicts arise, they are best dealt with early on.</p> <p>A way forward</p>	<p>shown that consultation and engagement with the public has taken place. This is not something the SCI has any control over.</p> <p>Recommended response: No change</p>
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	<p>We believe there is a way to promote the early engagement recommended in NPPF para 39, without requiring significant additional resource from WCC.</p> <p>We suggest that it would be possible to require the applicant to demonstrate in detail (eg methods and feedback) that they have carried out an adequate consultation process during the course of preparing the application. As part of the application, particularly for major applications, we suggest that the Local Validation List could include a 'Statement of Community Involvement' in an agreed format.</p> <p>At first contact with the SDNP, applicants could be advised of the requirement to complete such a form as part of the application. Pre-application advice sent out could encourage applicants to carry out consultation with the Parish Council as part of the design development process, prior to preparing the final design. This would provide a hefty 'nudge' to applicants to engage with local stakeholders early on, without compelling them to do so.</p> <p>We very much hope you will be able to consider making such a change to your planning procedures. This would, we hope, involve minimal extra WCC officers' time.</p> <p>It would result in a higher level of positive engagement of the Community, leading to a better standard of applications and completed projects.</p> <p>Page 34 Para 3.39 and 3.40</p> <p>We believe that Parish Councils should be consulted on all proposed amendments to proposals as to whether they can be considered as NMAs or otherwise, and also information supplied in discharge of condition. It is all too frequently the case that amendments to applications are accepted as NMAs, or supplements to the information provided at planning stage are accepted in discharge of condition, without sufficient knowledge of the implications for the immediate local area. This is frequently to the detriment of the built end-product.</p> <p>This is in no way intended to criticise the officers concerned. It is simply the case</p>	
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	<p>that in a large authority such as Winchester it is unrealistic to expect officers to have a complete and detailed knowledge of their area.</p> <p>Pro-active and positive Parish Councils have a role here to work in partnership with officers, to supply that local knowledge. We appreciate that time constraints will require a faster turnaround on responses on NMAs and planning conditions than other planning consultations, but given the way in which we have streamlined our decision making to make more use of email and less dependency on the monthly meeting, we believe a fast turnaround should be possible on this level of decision-making.</p>	
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Appendices. – 2 comments

Respondent ID	Comment	Officer response
ANON-T2RT- EWBF-G	No comment	<p>Comments noted</p> <p>Recommended response: No change</p>
ANON-T2RT- EWJH-T	<p>Page 36 with reference to 4.32 amendments have been taken out that state ‘some applications are referred to the Planning Committee in line with the scheme of delegation. At the request of a Parish or Town Council when their views are contrary to the intended decision of the officer.’</p> <p>The Committee feels that the suggested amendments to the SCI diminish the power of the parish council to refer the matter to the WCC Planning Committee.</p> <p>Examples of applications that did not go to WCC planning committee as requested by NATC are case numbers 23/00518/PNDMCD, Forge Works, The Dean (where there are only 6 parking spaces and not 9 as per WCC parking standards and 23/00429/HOU, 52 Jacklyns Lane.</p>	<p>Comments noted</p> <p>This matter is set out in the constitution – there is no change to the scheme of delegation. There are no implications, Parish Councils who are still able to call planning applications to Planning Committee (this is set out in the constitution).</p> <p>This is set out in the council’s constitution, and therefore not repeated here. The constitution is reviewed at different intervals to the SCI.</p> <p>Here is a link to the council’s constitution: Complete constitution version with bookmarks.pdf (winchester.gov.uk)</p> <p>Recommended response: No change</p>
BHLF-T2RT- EWJS-5	We broadly support the SCI and welcome reference to Historic England in Appendix 2 as a specific statutory consultee and a Duty to Cooperate prescribed body.	<p>Comments noted and support welcomed</p> <p>Recommended response: No change</p>

