



Winchfield Submission Neighbourhood Plan 2022 - 2037

Representation Form

Copies of the Winchfield Neighbourhood Plan and supporting documents are available on [Hart District Council's website](#). Paper copies are available at the locations listed on the website.

Comments must be received by 4pm Friday 23 June 2023

You can send your comments by:

- filling in this form and emailing it to [REDACTED]
- printing this form and posting it to us at:

Planning Policy Team
Hart District Council,
Harlington Way
Fleet,
Hampshire, GU51 4AE

We cannot accept anonymous comments and will publish all comments on our website with your name and organisation (where applicable). If Winchfield Parish Council, who prepared the plan, request a copy, we will send a redacted version showing only your name and comments.

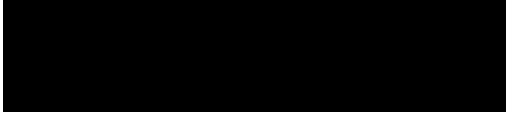


We will send the neighbourhood plan examiner a full copy of your comments and details. The examiner will retain the data until we have made the relevant statutory decisions on whether to adopt the plan and the deadline for a Judicial Review has passed, which is six weeks after the decision notice has been published.

For further details on: how your information is used; how we maintain the security of your information; your rights, including how to access information we hold on you; and how to complain if you have concerns about how your personal details are processed, please see [Hart's Privacy Notice](#).

If you would like to be notified of Hart District Council's decision whether to 'make' the Plan (to bring it into legal force), please mark the box below.

Yes, please notify me X

PART A: Details of the individual or organisation making the representation

	Your details	Agents details (if applicable)
Full name	Kim Hull	
Address		
Postcode		
Email		
Organisation (if applicable)		

PART B: Your representation

To which part of the Neighbourhood Plan does your representation relate?

Whole document? No

Paragraph number: 5.27-5.28 and Figure 5.8

Policy reference: NE3: Brenda Parker Way

Do you support, oppose, or wish to comment on this policy/paragraph?

(Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/objection, or make other comments in the space below, including any specific changes you wish to see to the Plan. Please be as precise as possible and use a new form for comments on different policies/parts of the Plan.

Representation:

Introductory Context to my comments

The background to these representations relates to the promotion of Shapley Heath, a new settlement concept between Hook, Hartley Wintney and Fleet, within the parishes of Winchfield and Hook.

Hart District Council sought to identify land in this area as a broad location for accommodating development needs growth within its now adopted Local Plan. The examination hearings found that more work needed to be done to justify the proposed growth strategy, and that the Plan could be found sound without Shapley Heath being included. The Inspector advised the Council to adopt the Plan to secure its 5-year land supply position rather than taking additional time to justify the proposed policy and a longer-term strategy for the district.

Following the adoption of the Local Plan, at the request of Hart District Council, Shapley Heath entered Phase 2 of the Government's Garden Communities Programme. Its sub-regional location meant it scored very well during Homes England's evaluation of the Phase 2 submissions. Joint working on the baseline evidence base began between the developers and the Council. The objective was to ultimately achieve a 'Prospectus' for Shapley including a masterplan. This information would have informed the next update of the Local Plan.

As the project progressed into year 2, LA funding from Homes England was ultimately lower than expected. The assessment of Shapley Heath was halted by the Council in late 2021 before the evidence base was complete. The project did not reach the masterplanning stage.

The Shapley Heath concept when, viewed against other development options in Hart District, remains a very strong proposition. Paragraph 1.14 of the WNP explains that its review is

based on the prospect of Shapley Heath being reconsidered in a future update of the Local Plan. The parish therefore chose to update its own Neighbourhood Plan to re-state and reaffirm its vision for its area. Naturally, some tension can be expected to arise in the future between the strategic planning of a district and how it might impact a particular part of it. The parish council can focus on its particular area, but the District Council has a duty to look at the district in the round, when undertaking its forward planning duties.

Whatever the potential future context of plan-making in Hart, it is necessary for the policies of the review of the Winchfield Neighbourhood Plan to meet the basic conditions test. I have identified instances where I consider that due regard has not been given to national policies and advice contained in guidance issued by the Secretary of State. The examiner is directed to these instances and how the NP should be modified to meet the basic conditions.

Policy NE3: [Brenda Parker Way]

Policy NE3: [Brenda Parker Way] identifies a Brenda Parker Way ‘corridor’, the purpose of which is to safeguard a section of this long-distance recreational route between the railway and the A30. This section is described as an ancient sunken path or ‘green lane’.

Policy NE3 references Figure 5.8, which is reproduced overleaf. The north western part of Figure 5.8 has been cropped and does not show out the north western tip of the parish boundary. Consequently, it is not clear if the corridor extends all the way to the A30. I think this is probably a formatting error that should be corrected for the ‘made’ version of the Plan.

Figure 5.8 identifies the alignment of Brenda Parker Way ‘itself’ with thick dashed purple line, and this is shown in the key. From south to north the actual route of the ‘Way’ follows the alignment of Byway 117/1/2 until it reaches footpath 254/9/1. This footpath is the dashed red line that is partially cropped in the north west part of Figure 5.8. An accurate Figure 5.8 would show Brenda Parker Way (the purple dashed line) following footpath 254/9/1 up to the A30. The residual part of Byway 117/1/2 between footpath 254/9/1 and the A30 (around 100m) is just that, although the casual observer might assume it was part of the Way itself¹.

The route of Brenda Parker Way is partially obstructed by the parish boundary (black line) and by a green line that, based on Figure 5.9, identifies hedgerows. These features need to be shown on the key.

¹ See footnote 6 of Section 3 of Appendix D to the NP

Figure 5.8: Brenda Parker Way

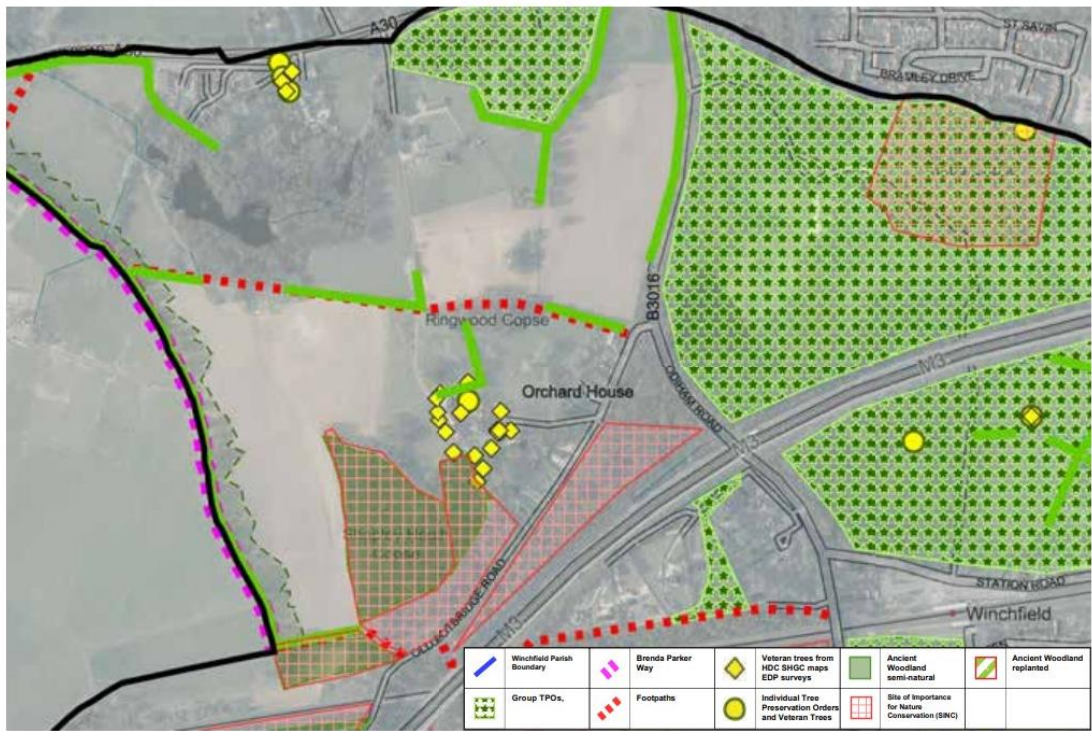


Figure 1 of Section 3 of the Evidence Base



Figure 8 also identifies land to the east of Brenda Parker Way that I assume is ‘the corridor’ for the purposes of Policy NE.3. This area is shaded green and has a thinner dashed green line to identify its edge, which is irregular. The corridor is not identified in the key and this needs to be rectified.

The irregularly drawn boundary of the corridor has either been drawn with a great degree of precision, or it is ‘illustrative’ The justification for Policy NE.3 (and therefore Figure 5.8) is based largely on Section 3 [Brenda Parker Way Landscape Report] of Appendix D [the Regulation 16 Evidence Base].

Figure 1 of Section 3 is reproduced on the preceding page and identifies an approximate visible setting to Brenda Parker Way. This is said to be approximate for various reasons, such as seasonality, height of the walker, and whether a section of the route is sunken or not.

The delineation of the Brenda Parker corridor within Figure 8 of the Neighbourhood Plan itself is spatially ‘tighter’ than the approximate visible setting that is shown in the evidence base. Due to its irregular nature, as opposed to a more regular ‘zig-zag’, it appears to have been drawn with some precision. There is, however, no specific evidence (Section 3 of Appendix 3 contains only general observations) to explain why the corridor expands and contracts at various intervals along the Brenda Parker Way. In our assessment the delineation of the corridor in Figure 8 can therefore only be ‘illustrative’ and this should be made clear when the key is eventually added.

A precise delineation of a corridor to the east of Brenda Park Way to delineate a safeguarding zone to mitigate the impact of any future development on this feature of this feature can only really take place at planning application stage, when a proposal has been presented and is being assessed/evaluated in the round. Up until that point the establishment of an objective in Policy NE.3 is reasonable but attempting to delineate with precision is not. Any map-based delineation should be clearly identified as illustrative. I am content with the boundary as drawn on Figure 5.8, but it should be labelled as illustrative if it is retained.

It may be the case that the examiner determines that safeguarding of Brenda Part Way should only be expressed in terms of a planning objective, without recourse to the mapping of an illustrative corridor.

Turning to the actual wording of NE.3, it is comprised of three sentences:

‘The Brenda Parker Way corridor as shown on Figure 5.8 has been designated to safeguard the ancient sunken path or ‘green lane’ which is part of Brenda Parker Way. This section of the long-distance path is a shared Parish between Hook and Winchfield. Development which safeguards the Brenda Parker Way ‘corridor’ (our emphasis) and its setting will be supported’.

Turning to the final sentence first. This could be interpreted as meaning not only that Brenda

Parker Way itself be safeguarded, but that the setting of the ‘corridor’ (not just the WAY) must also be safeguarded. This raises ‘setting of setting’ issues and double layers of safeguarding, i.e of the Way itself and then of the illustrative corridor that is safeguarding the Way.

Paragraph 10 of Section 3 of Appendix D notes that “*The emerging policy is to conserve and enhance the character of the study site, or more specifically, the character of the section of BPW that runs through it.* This helpfully identifies that it is the character of the Way that is the issue.

The role of the corridor is to achieve the safeguarding of the character of the Way and the experience of using it. To meet the basic conditions, the final sentence should be changed as set out below. I also consider that the second sentence (concerning administrative geography) does not concern the purpose and justification of the policy and should be removed.

*‘The Brenda Parker Way corridor as shown on Figure 5.8 has been designated to safeguard the ancient **‘sometimes’** sunken path or ‘green lane’ which is part of Brenda Parker Way. ~~This section of the long distance path is a shared Parish boundary between Hook and Winchfield.~~ Development which safeguards the **character of** Brenda Parker Way ~~corridor and its setting~~ will be supported’.*

The above wording is based on the identification of a spatially defined ‘corridor’ in the first place. I remain unconvinced that the spatial representation of this corridor should be identified in the Plan. The justification for not doing so is like the reason why the setting of a listed building is not shown on plans that form the development plans.

An alternative would be for Policy NE.3 to simply read as follows.

*‘The **section of** Brenda Parker Way ~~corridor~~ as shown on Figure 5.8 ~~has been designated to safeguard the~~ **is an** ancient **‘sometimes’** sunken path or ‘green lane’. ~~which is part of Brenda Parker Way. This section of the long distance path is a shared Parish boundary between Hook and Winchfield.~~ Development which safeguards the **character of** Brenda Parker Way ~~corridor and its setting~~ will be supported’.*

The evidence base behind the plan identifies that land either side of this route has significance to the character of the Way itself and this would need to be considered when forming and assessing any development proposals

In making comment on the Regulation 16 wording of Policy NE.3, there is some value in highlighting the wording of the Regulation 14 version of Policy NE.3. This was drafted in the following terms;

“The landscape corridor as shown on Figure 5.8 has been designated to safeguard the ancient sunken path or ‘green lane’ which is part of Brenda Parker Way. This section of the

long-distance path is a shared Parish boundary between Hook and Winchfield.

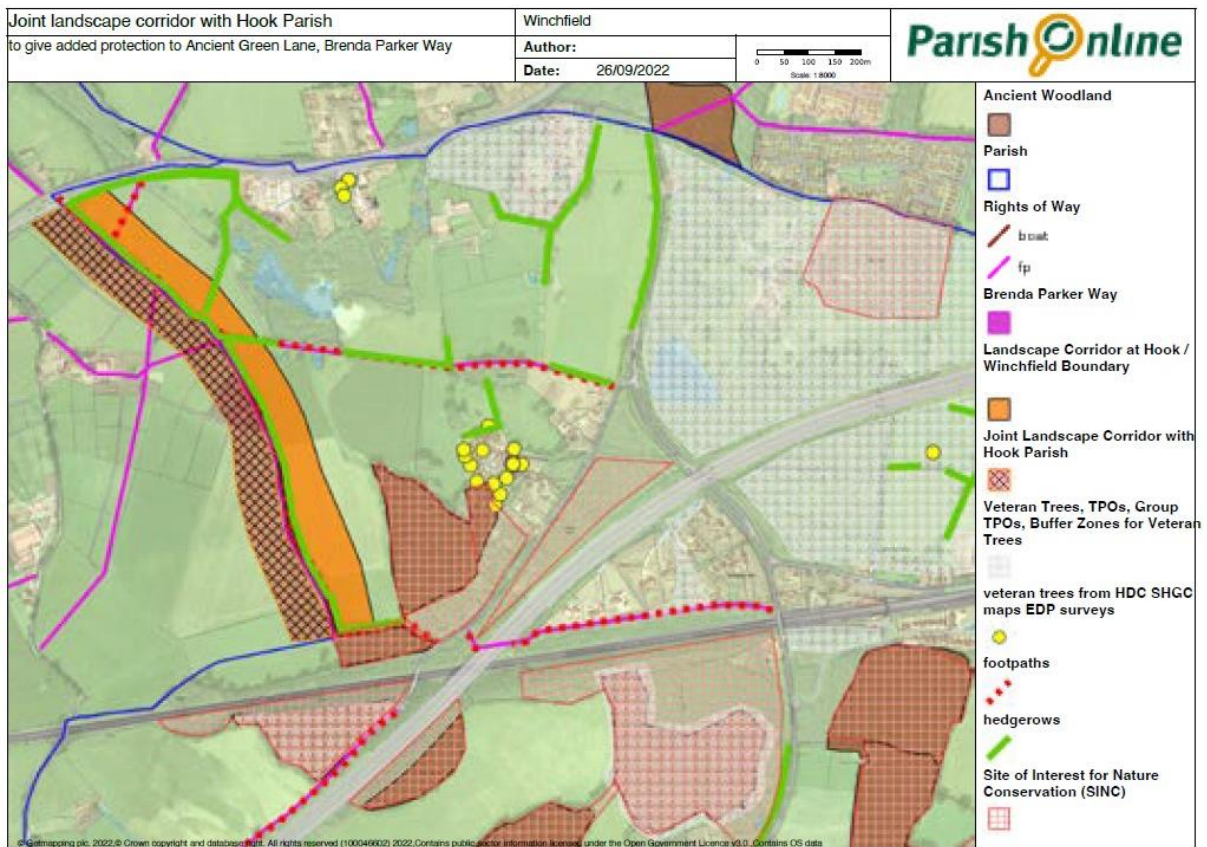
The first sentence of this confirms our assessment that our proposed amendment to the Regulation 16 version of Policy NE.3 is needed for the policy to focus on Brenda Parker Way itself.

For completeness, I present the Regulation 14 version of Figure 5.8 overleaf. As can be seen, at this stage the Brenda Parker Way corridor was termed as a joint landscape corridor, and it was significantly wider (on each side of the Way) than is now identified in the Regulation 16 version of the Winchfield Plan. The Regulation 16 Plan now acknowledges that at present the Winchfield NP Review should not identify any intent for a review of the Hook NP to pursue a similar policy to NE.3.

In summary, Figure 5.8 in support of Policy NE.3 has evolved and the spatial depiction of 'the corridor' has been refined. If there is to be a corridor, it should be made clear that the boundary is illustrative and additions should be made to the key. As set out above, Policy NE.3 can function to achieve its objectives without any indicative safeguarding corridor being identified on a plan

The actual wording of Policy NE.3 needs to be streamlined/refined so that it retains its focus on BPW itself (as per the Regulation 14 wording).

Regulation 14 Version of Figure 5.8



Where the independent examiner considers it necessary to ensure adequate examination of an issue or to give a person a fair chance to put a case, they must hold a hearing to listen to oral representations about a particular issue.