



ALFRED HOMES

**Representation to the Winchester District Local Plan  
Regulation 19 Draft**

**Policy H3**

**October 2024**



# ALFRED HOMES

## Contents

1. Executive Summary .....	2
2. Consistency and Evidence Base .....	3
3. Brownfield First .....	9
4. Conclusions and changes required .....	15



## ALFRED HOMES

### 1. Executive Summary

- 1.1. The Paper is drafted by Chris Rees DIP TP MRTPI has been lodged against Policy H3, insofar as it relates to the wider assessment of the Settlement Hierarchy, the culmination of which is Policy H3.
- 1.2. This representation demonstrates that the Council's approach and resulting Policy cannot be considered 'justified', nor consistent when applied in the assessment of development opportunities and the site selection process.
- 1.3. The representation centres on the Village of Littleton and the wider Parish of Littleton and Harestock, which encompasses both the Village and the northern part of the City of Winchester.



## ALFRED HOMES

### 2. Consistency and Evidence Base

2.1 Littleton is the closest Village to Winchester City, with a separation distance of less than 800m at its closest point, and with the Parish Council covering both the Village and the northern part of the City itself, recognising the close relationship between the two areas.

2.2 Littleton benefits fully from its own facilities, but also from this proximity to Winchester, with the local centres of both Weeke and Harestock within 2km of the Village; a distance recognised as one which would encourage walking and cycling to services and facilities. Such services include:

- A Primary School
- A Secondary School
- Pre-School
- Friarsgate GP Practice
- Pharmacy
- Two major supermarkets
- Village Hall
- Sports and Recreation facilities, including children's play, tennis and bowls
- Convenience Store
- Bakery, and
- Numerous independent shops and takeaways

2.3 Despite this proximity and availability of this level of services and facilities, the Village of Littleton is categorised by the City Council as one of the least sustainable in the District, scoring 10 and classed as a 'Small Rural Settlement' within the Settlement Hierarchy Paper (August 2024). This, we contend, and as evidenced within this Paper, is a complete misrepresentation, and not supported by the LPA's own evidence and Spatial Strategy within the Regulation 19 Draft relating to the Sir John Moore Barracks.



## ALFRED HOMES

- 2.4 Before the Paper examines the LPA's position in respect of the Barracks and the Nursery, it is necessary to also highlight another example of the skewed nature of the conclusions of the Settlement Hierarchy, which results in the Plan being unsound.
- 2.5 This example concerns the village of Sutton Scotney, which scores 14 in the Council's Settlement Hierarchy Assessment<sup>1</sup>, with the extra 4 points afforded by the LPA over Littleton being simply a Convenience Store and a Pre-School. As a result of this scoring, the LPA has allocated a greenfield site for 50-60 dwellings at Land at Brightlands within the Regulation Draft 19.
- 2.6 To place this into some context, this 50-60 greenfield allocation is located some 8km from the fringe of Winchester, with no supermarket, Primary or Secondary education facilities and no hourly bus service, and yet we are told by the LPA that this greenfield site represents a more sustainable form of development than a brownfield site within 2km of the aforementioned list of education, medical, retail and supermarket facilities listed within Para 2.2. This one example alone demonstrates the failings of the Settlement Hierarchy and site selection process and cannot represent the basis upon which the Plan can be found sound.
- 2.7 Turning back to Littleton and the Barracks, as per **Policy W2** of the Regulation 19 Draft, the Local Planning Authority advocates that Littleton & Harestock Parish is indeed a sustainable location for large scale residential development by way of the allocation of the Sir John Moore Barracks for 750-1,000 dwellings.
- 2.8 Para 12.14 of the Local Plan identifies the location of the Barracks as being '*...located between the settlement of Littleton and built-up area of Winchester Town, and approximately half of the site is located in the Settlement Gap (Policy NE7)*'. (Para 12.14, Regulation 19 Draft).
- 2.9 The latter part of this sentence is correct, with the southern portion of the land falling within the Local Gap as shown within Figure 1.

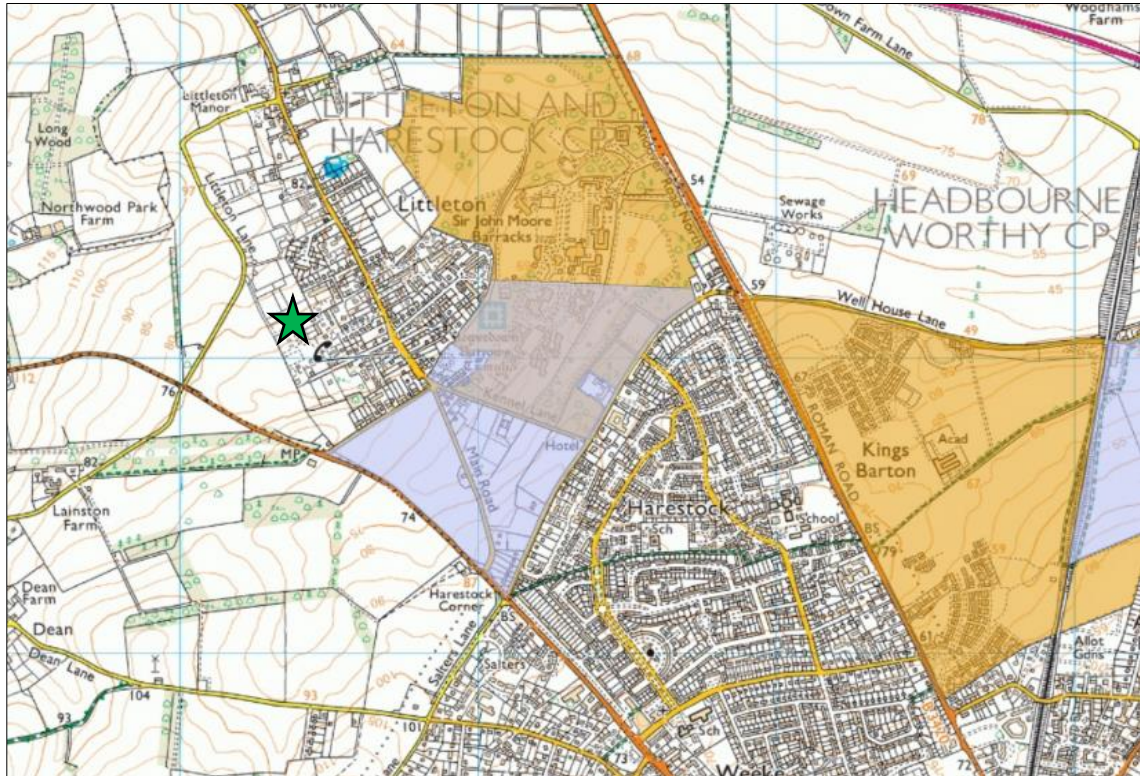
---

<sup>1</sup> Page 15 Settlement Hierarchy Assessment August 2024



## ALFRED HOMES

**Figure 1: Extract Local Plan Proposals Map (Blue shading indication Settlement Gap/ Green Star Littleton Nursery)**



- 2.10 However, it is false to state that the Sir John Moore Barracks Allocation falls ‘*between Littleton and the built up area of Winchester*’, given the majority of the Allocation as shown within Figure 1 extends to the east and northeast of the Village, thus extending further from the City of Winchester than much of the existing Village and the Littleton Nursery.
- 2.11 Indeed, as per the latest indicative Masterplanning for the Sir John Moore Barracks as shown in Figure 2, this includes housing within the northernmost extent of the Allocation; a distance significantly greater than that of the Littleton Nursery to the services and facilities of the most sustainable conurbation within the District.



## ALFRED HOMES

Figure 2: Sir John Moore Barracks indicative masterplan



2.12 While the scale of the Sir John Moore Barracks and the Littleton Nursery is not comparable, its locations very much are, with the Local Planning Authority concluding that the Barracks is close enough to the City of Winchester so as to have a functioning relationship, and thus contribute towards the City's ring fenced housing requirement.

2.13 In contrast, Littleton Nursery is, in the view of the LPA, located within an 'unsustainable' Village.

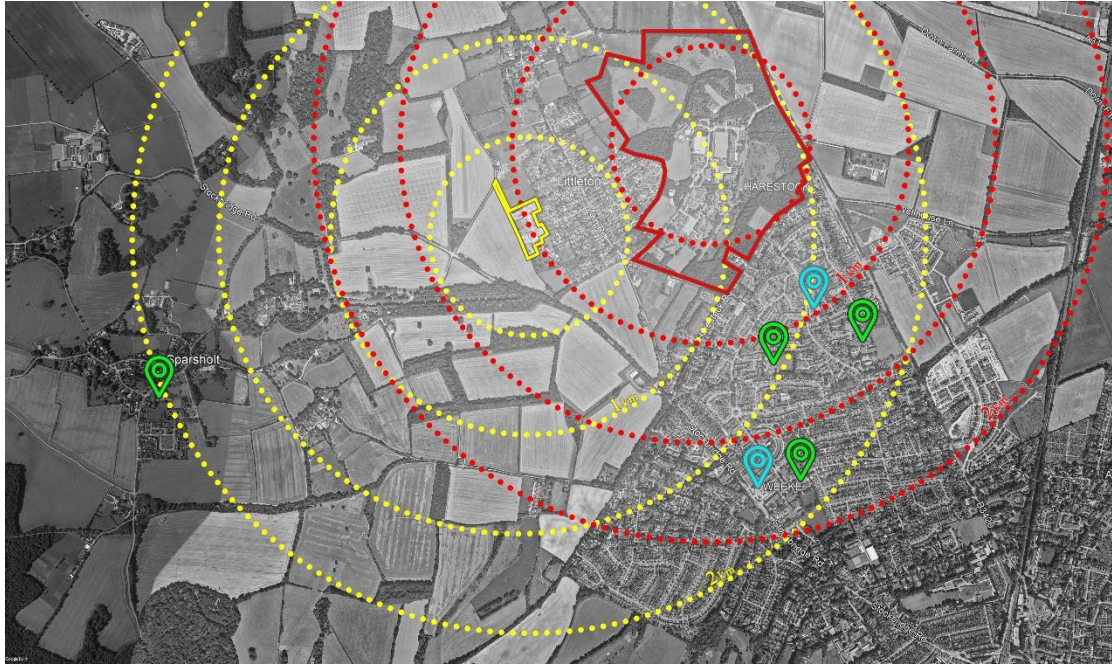
2.14 It is perverse of the Local Planning Authority to make such differing conclusions as it ignores entirely the evidence and geographical relationship between the two land parcels and the City, with the Barracks actually extending further from the City than the Nursery land.

2.15 This error goes to the heart of whether the Council's site selection process is 'justified', and to illustrate this inconsistency further, Figure 3 provides a direct comparison between the two land parcels and the distances to the City and nearby services and facilities.



## ALFRED HOMES

**Figure 3: Comparison between the Littleton Nursery and Sir John Moore Barracks.**



- 2.16 For the purposes of this comparison, the central point of both the Nursery and the Barracks has been taken for the starting point of the concentric circles, which are drawn at 500m intervals. The Yellow Circles represent the Littleton Nursery, and the Red Circles the Sir John Moore Barracks, with both edged in the corresponding colour.
- 2.17 Additionally, the location of the Weeke and Harestock Local Centres have been shown with a Blue Marker and the three Primary Schools of Weeke, Harestock and Sparsholt, as well as Henry Beaufort Secondary School, shown in Green.
- 2.18 Far from being remote and unsustainable, the majority of Littleton, inclusive of the Nursery site, falls within 2km of all of the services within Weeke and Harestock, including the Schools, GP Surgery, Pharmacy, Supermarkets and facilities. This is very much comparable, and indeed better than many of the other Towns and Villages within the District that are deemed 'sustainable' by the Local Planning Authority, and the Sir John Moore Barracks itself, which the Local Planning Authority has deemed to be a sustainable location.





## ALFRED HOMES

- 2.19 Having made the representation to the Local Planning Authority at the Regulation 18 Stage, the Inspector will note the response as provided in italics:
- 2.20 *The hierarchy focuses upon the services within each settlement, as that is more easily quantifiable in a way which can be summarised and inform the emerging development strategy. Sir John Moore Barracks is a major site which is being released from military use. It is important for the Local Plan to consider the future use of the site for this reason, not simply because it is brownfield site. It is logical that it should be treated as an extension of Winchester as it adjoins the Winchester built-up area, unlike Littleton Nursery. (Page 24/25, Response to ANON-KSAR-NKTJ-8 Policy H3 representations Regulation 18).*
- 2.21 As illustrated in Figure 1, 2 and 3 of this representation, the notion that the development of the Sir John Moore Barracks adjoins the Winchester built-up area is false.
- 2.22 The Inspector will be aware that the wording of Policy W2 requires the proposals for the Barracks to respect the 'Local Gap' between Littleton and Winchester, with the emerging Masterplan showing the housing set back from Harestock Road and limited to the existing built up area. As a development therefore, the future housing at the Barracks does not adjoin Winchester and is much more related to Littleton, to which it extends around its eastern flank and to the northeast.
- 2.23 With regard to the opening sentence, the assessment of the Settlement Hierarchy cannot be a true reflection and thus justified if the interdependency of settlements in close proximity to one another has not been considered; particularly a Village such as Littleton, and the quantum and range of services and facilities within 2km of it.
- 2.24 To do so results in a skewed and unjust assessment as evident in the case of Littleton, made even more unjust with the allocation of up to a 1,000 dwellings adjacent to it.
- 2.25 Finally, in respect of the mid part of this response, it is not questioned that the future use of the Sir John Moore Barracks should be considered as part of the Local Plan process, but that to be considered 'sound', and be justified when considered against the reasonable alternatives, the future use of the Nursery should have been assessed on the same parameters, which it has not.



## ALFRED HOMES

### 3. Brownfield First

- 3.1. The representation now turns to the assessment of the Nursery itself, in the context of the Local Planning Authorities stated position of a 'brownfield first' approach.
- 3.2. Turning back to the wording of the Regulation 19 draft, Para 12.15 states in respect of the Sir John Moore Barracks that *'Part of the site comprises 'previously developed land' so it is important to make the full use of the site's potential, within the existing constraints'* (Para 12.15, Reg 19 Draft).
- 3.3. This is true, and yet the Littleton Nursery, which is 100% brownfield, has not benefited from this weighting and approach of seeking to make use of the site's potential. The LPA's response to this will be that brownfield sites in 'unsustainable' villages were not considered, however, as per this representation, this position belies the facts on the ground and the direct comparisons with the Barracks.
- 3.4. To provide some context of the Nursery, Figure 4 provides a series of pictures of the current B8 use.



## ALFRED HOMES

**Figure 4: Photos of Littleton Nursery**



- 3.5. Within its Integrated Impact Assessment (IIA) Appendix F, Page 641, the Council's evidence base concludes in respect of the Nursery that *'The majority of the site contains brownfield land. A significant proportion of the site (>=25%) is on Grade 3 agricultural land or less than 25% of the site is on Grade 1 or 2 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area'*.
- 3.6. As can be seen from the photos and the aerial imagery at Figure 5, there is no agricultural land within the site, with the land being 100% previously developed. The land is also not within a Mineral Safeguarding Area; another error in the assessment of the site and the Council's evidence base.



## ALFRED HOMES

Figure 5: Extract from Mineral Safeguarding Mapping (Source: HCC)



- 3.7. These errors in the LPA's evidence base were raised as part of the Regulation 18 representations, but unfortunately neither were acted upon.
- 3.8. Instead, the response from the LPA stated that *'The IIA can be correct that the majority of the site is brownfield, but it may also contain some higher quality agricultural land regardless of its lawful use'*. It simply cannot be the case that a B8 Storage yard consisting of hardstanding and tarmac can be classed as being higher quality agricultural land.
- 3.9. Having pointed out this error to the Local Planning Authority, a simple check of the aerial photography would have confirmed the position of the absence of any agricultural land. Alas, the error remains within the Council's evidence base and further undermines the Council's justification for its site selection approach.



## ALFRED HOMES

**Figure 6: Aerial showing the Littleton Nursery and hardstanding**

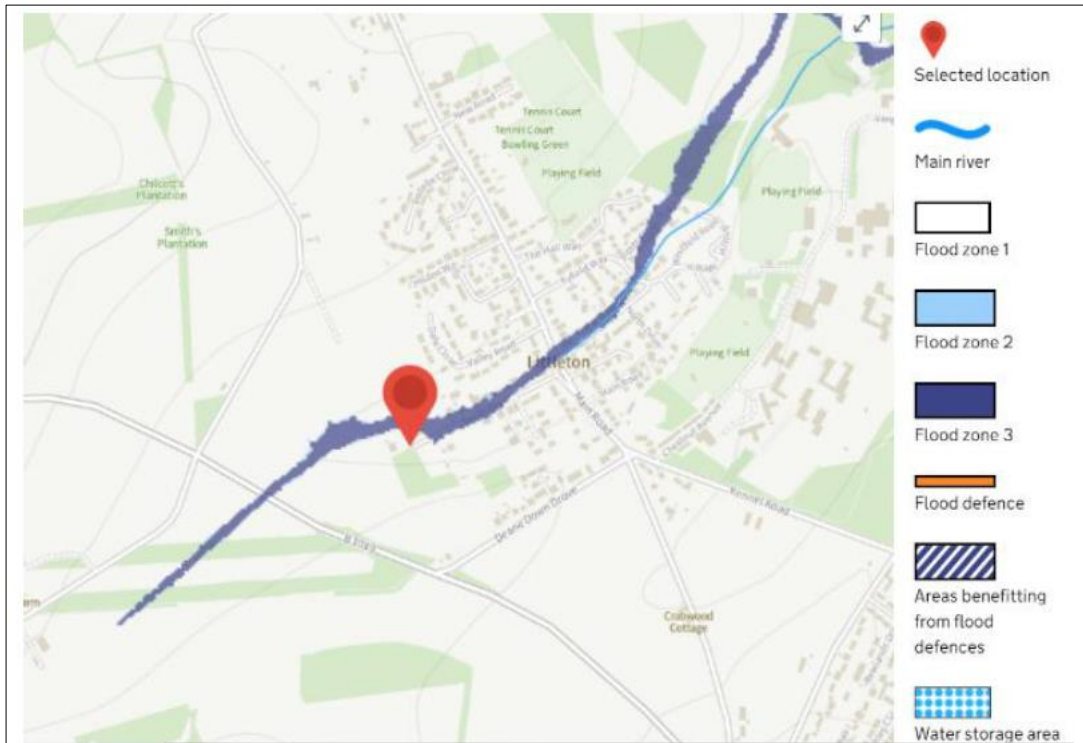


- 3.10. The aerial imagery provides a ubiquitous illustration of the PDL nature of the former Nursery site, and moreover, the comparison with the Barracks in respect of the relationship of both to Littleton and the City of Winchester. How one can be judged sustainable and having a functional relationship with the City and the other being remote and located within one of the least sustainable villages in the District, goes to the heart of the failing and why the Plan as drafted is unsound.
- 3.11. In respect of the proposals for the Nursery, as provided within Figure 8, a comprehensive assessment of the opportunities and constraints has been undertaken, including a full Flood Risk Assessment to address the small part of the land falling within Flood Zone 3, resulting in a considered Masterplan for 50 dwellings. Based upon EA mapping, most of the site is situated within Flood Zone 1 and therefore at very low probability of fluvial flooding although a functional flood path exists nearby, at the south end of the development as shown on the EA flood map.



## ALFRED HOMES

**Figure 7: Flood Mapping**



- 3.12. Mitigation for the overland flow risk has been established with the engineering firm Ridge, with the use of filter trenches along the lower western site boundary and eastern site with a shallow attenuation 'pond' in between to capture excess overland surface water or rainwater.
- 3.13. The 'pond' area would remain dry for most years and possibly only start to saturate during periods of very high ground water if the drainage trenches could not infiltrate or otherwise contain water.
- 3.14. In any instance, the proposed SuDS for rainwater run-off will be able to capture both the onsite rainfall as well as any rainfall arriving from the south-west. This rainfall capture and infiltration will likely provide welcomed benefits to the adjacent properties and the community by preventing overland run-off passing through the lower site corridor as well as containing the existing site rainfall run-off.



## ALFRED HOMES

**Figure 7: Nursery Masterplan**



- 3.15. As shown within Figure 3, the Nursery is within 2km of Harestock Primary School, Weeke Primary School and Henry Beaufort Secondary School. Moreover, Sparsholt Primary School, which is the feeder school for Littleton, sits just at the 2km distance and as per the majority of smaller villages, is continually battling for pupil numbers. The delivery of the Nursery would provide significant choice for education facilities within close proximity for a range of open market and affordable tenures, and in a location far more sustainable than the example given of Sutton Scotney, which has no education facilities.



## ALFRED HOMES

### 4. Conclusions and changes required

- 4.1. Consistency of decision making goes to the heart of sound planning decisions, that being within the Development Management sphere and Local Plan production. What is plainly evident is the lack of consistency taken by the Local Planning Authority in its assessment of the Sir John Moore Barracks and its assessment of the Littleton Nursery.
- 4.2. The Council cannot in its Plan making direct between 750 and 1,000 new homes to Littleton as a Village, conclude this is sustainable due to the close relationship with the City of Winchester, while at the same time deeming Littleton a 'Small Rural Settlement', in the context of assessing and thus rejecting other brownfield opportunities in the village. Such an approach lacks consistency in the plan making process, and therefore is open to challenge.
- 4.3. Moreover, when compared to the services and facilities located within 2km to the brownfield Littleton Nursery, it cannot be the case that the greenfield allocation at Land at Brightlands, Sutton Scotney, some 8km from Winchester and a village completely dependent on Winchester and Basingstoke for its socio and economic needs represents a more sustainable development.
- 4.4. The Site Selection process and by extension the Settlement Hierarchy Assessment goes to the very heart of the soundness of any Local Plan and a failure to assess each opportunity accurately, and importantly, consistently, is the reason why the Plan fails the 'justified' test of soundness.
- 4.5. In order to render the Plan sound, consistency of assessment is needed, which would yield to the recognition of the services and facilities readily available to the Littleton Village within Policy H3. Adopting the Council's brownfield first policy, and applying the same parameters as applied to the Sir John Moore Barracks, would yield an allocation of the brownfield Littleton Nursery for 50 dwellings and a more sustainable location of development when compared to Land at Brightlands.
- 4.6. End.