

**Representations to  
Winchester City Council's  
District Local Plan 2020 -  
2040 Regulation 19  
Consultation**

Land adjoining 85 Church Lane,  
Colden Common (Policy CC4  
and H2)



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## 1.0 [Introduction](#)

- 1.1 Southern Planning Practice Ltd have been instructed to prepare these representations on behalf of the [REDACTED] who own the land adjoining 85 Church Lane in Colden Common, in response to the Winchester District Local Plan 2020-2040 Regulation 19 currently the subject of a public consultation.
- 1.2 The site subject of these representations is proposed to be allocated for 10 dwellings by Policy CC4 of the Regulation 19 Local Plan.
- 1.3 The allocation under policy CC4 is strongly supported in principle.
- 1.4 The [REDACTED] however, particularly object to policy CC4(i) relating to the nature and phasing of the development and to policy H2, Housing Phasing and Supply, to which it is cross-referenced to.
- 1.5 It is emphasised throughout these representations that the Local Plan needs to ensure it is planning ambitiously to meet the Government's housing targets and the housing requirement for the district over the plan period and beyond. It is highlighted that the site allocated by Policy CC4 would provide an immediate, important contribution to Winchester City Council's housing need over the plan period. The opportunity presented by the site is discussed throughout these representations.
- 1.6 It is considered that the overall housing need is not being properly met and therefore it is important that sites come forward quickly to fill the gap. but even if it were met the systematic approach to the phasing will slow down the delivery of housing.
- 1.7 These representations have also been prepared in the context of the proposed changes to the National Planning Policy Framework (NPPF) which have been recently consulted on. The proposed changes to the NPPF seek to significantly boost housing delivery to deliver the Government's commitments to achieve economic growth and build 1.5 million new homes.
- 1.8 The site comprises an area of agricultural land which is currently maintained grassland. It forms a logical rounding-off of the settlement where good defensible boundaries can be maintained.
- 1.9 These representations will respond to the proposed policies set out in the Local Plan Regulation 19 Consultation.

1.10 It is confirmed that the land proposed to be allocated by Policy CC4, is available, suitable and achievable and therefore deliverable in accordance with the definition set out in the NPPF.

## 2.0 [Response to Vision and Objections and Spatial Strategy](#)

2.1 The following provides a response to the two strategic policies, namely Spatial Policy SPI and Spatial Policy SP2, set out in the Regulation 19 Local Plan which relate to the visions and objectives and spatial strategy of the plan.

### *Spatial Policy SPI - Vision and Objectives*

2.2 Policy SPI confirms that the Council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development. We largely support the Vision for Winchester District over the plan period. Whilst we acknowledge that it sets out that the market towns and rural settlements will remain attractive settlements to support evolving communities and the economy, we encourage the Council to allow such settlements which are sustainable to deliver appropriate growth as opposed to 'modest' growth which suggests growth in these sustainable settlements will be limited and not ambitious, as required by the National Planning Policy Framework (NPPF).

2.3 The objectives set out to deliver the vision are supported. In particular, the objective to provide homes for all is key to ensure that the Local Plan delivers high quality new housing to meet identified local needs.

### *Spatial Policy SP2 – Spatial Strategy and Development Principles*

2.4 Strategic Policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification. The strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester Town and the South Hampshire Urban Areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, Market Towns and Rural Area, is identified to make provision for 3,850 new homes.

- 2.5 Colden Common is identified as a Larger Rural Settlement within the Market Towns and Rural Area. Whilst we are supportive that this area will make provision for some housing, as this spatial area covers a large physical area of the district, we believe that the Council should be more ambitious in its housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PFSH) area.
- 2.6 We support the development strategy for Market Towns and the Rural Area which sets out that development will be provided in the most accessible and sustainable locations, to support the vitality and viability of communities. However, it is considered that as currently drafted, the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities. We therefore encourage the Council to make provision for further homes in the Market Towns and the Rural Area by considering allocating further sites in the spatial area.
- 2.7 The Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the market towns and rural areas of the district to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect the environment is supported. However, we encourage the Council to review the housing provision for this area and increase it to ensure it is in accordance with the Government's ambitious housing targets over the next five years and beyond. Section 3 of these representations further explores the housing provision for the district over the plan period.

### 3.0 [Response to Housing Provision](#)

- 3.1 The following responds to the 'Homes for all' section of the Local Plan which seeks to determine the housing provision and then confirm how this will be delivered over the plan period.

#### *Strategic policy H1 – Housing Provision*

- 3.2 Strategic Policy H1 of the Regulation 19 Local Plan sets out the housing provision for the plan period to be circa 15,115 dwellings. It confirms that this housing provision will be split between the three spatial areas.

- 3.3 Table H1 indicates that the housing requirement, as calculated using the standard method, is 13,565 homes over the plan period. It is disappointing that the Council have not set out that this figure should be a minimum number of homes to be delivered over the plan period, as required by the current standard method set out in the NPPF. We therefore encourage the Council to indicate this figure to be the minimum and to allocate a sufficient number and variety of sites to ensure that the Local Plan supports the Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF.

- 3.4 As per paragraph 61 of the NPPF, the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. Further, as per the Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205, the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Winchester district.

- 3.5 Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the NPPF, the Local Plan review must:

*“provide (ing) a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.*

- 3.6 Further, it is pertinent to note that the proposed reforms to the NPPF, the consultation of which ended on 24 September 2024, proposes to restore the standard method for assessing housing need to be mandatory and a new standard method to be introduced.
- 3.7 The revised standard method is intended to support the Government's ambition to deliver 1.5 million homes over the next five years. The proposed revised standard method seeks four principles of reform, these are:
- *To support the Government's **ambition** to deliver 1.5 million new homes over the next five years;*
  - *provide greater **certainty** to the sector through more stable and predictable housing numbers;*
  - *achieve a more balanced **distribution** of homes across the country, by directing homes to where they are most needed and least affordable, and ensure that all areas contribute to meeting the country's housing needs, rather than radically undershooting local ambition in some areas of the country; and*
  - *be **straightforward** to understand and apply – so that the method can be easily replicated, be updated in line with the most recent publicly available data, and speed up plan making.*
- 3.8 The new standard method is proposed to use a baseline set at a percentage of existing housing stock levels, tops up this baseline using a stronger affordability multiplier and removes arbitrary caps and additions so that the approach is driven by an objective assessment of need. In the light of the proposed new standard method, the current housing requirement proposed in the Regulation 19 Local Plan is not ambitious enough to achieve the Government's housing targets. While appreciating that the proposed transition arrangements under the draft NPPF would prevent the draft housing methodology being applied, the importance and urgency of boosting housing supply as set out in the Deputy Prime Minister's letter of 30 July 2024 still applies.
- 3.9 It is therefore considered that the Council should look to increase the housing requirement and therefore provision to ensure that it is appropriately and sufficiently planning for growth, in accordance with the Government's current housing targets.
- 3.10 Paragraph 9.18 confirms that '*There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2020), or which are allocated by the existing Local Plan but have not yet been developed.*' Together with the housing requirement calculated under the current standard method, the housing provision

over the plan period is confirmed to be 15,465 homes. Of this figure it is confirmed that 3,170 dwellings have been completed from 2020-2023 since the start of the plan period. This equates to approximately 20.5% of the overall housing provision. In addition, 6,780 dwellings (43.8%) of the housing provision are outstanding planning permissions and 745 dwellings (4.81%) are other commitments from previous Local Plans. Therefore, only 2875 (18.6%) are new proposed allocations in the Regulation 19 Local Plan and 1,895 (12%) dwellings have been indicated as windfall development. In our view, it is not considered that the plan has been positively prepared and will therefore not meet the tests of soundness with only 18.6% of the housing provision over the plan period coming from new allocations. We therefore urge the Council to look at allocate further sites to boost and bolster the housing supply throughout the plan period. We also strongly suggest the Council does not seek to 'hold' greenfield sites back until later in the plan period, this is discussed in detail later in these representations.

3.11 It is clear there is an over reliance on previously allocated sites, some of which have been built out and others which are complex brownfield sites which have not come forward in previous plan periods. Therefore, the deliverability of several of the allocated sites proposed to be carried over from the current Local Plan is questioned. The Levelling Up and Regeneration Act has identified that there is a problem of allocated sites not coming forward for development and has put in place legislation to try to prevent this, as it is clearly a problem, although the secondary legislation enforcing this has not been issued. Therefore, if a site cannot be demonstrated as available, suitable and achievable, it should not be included as an allocation, unless an explanation can be provided as to why it has not been delivered to date and why it can now be considered deliverable. Without this justification, these sites should be deleted.

3.12 Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of the proposed sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council needs to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further small and medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement.

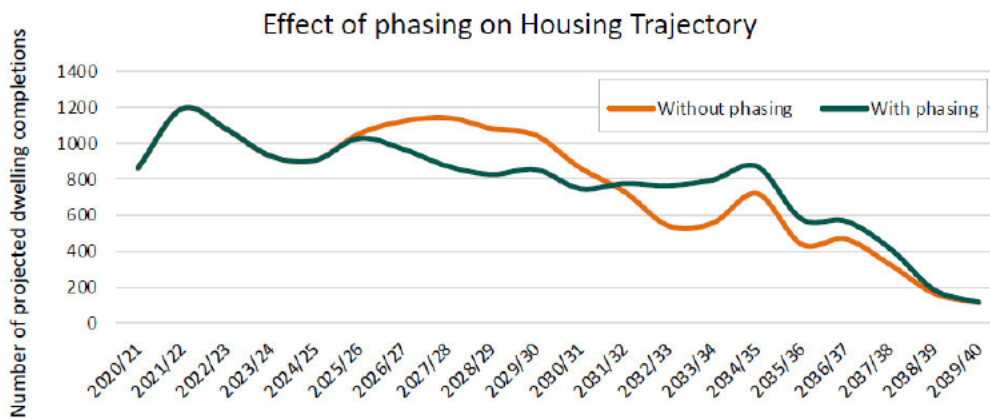


## Strategic Policy H2

- 3.13 Strategic Policy H2 sets out that phasing will be applied to new greenfield housing sites allocated by the Local Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. 12 sites are identified, including the site allocated under policy CC4, to not be permitted in advance of April 2030 unless *'they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time'*. These sites contribute a total of 655 dwellings to the housing requirement in the plan period. It is unclear what purposes the phasing serves in terms of *boosting housing supply* or indeed why housing should be prevented or rather delayed when the need should be met now. It may be to delay the housing delivery trajectory from falling below the annual housing target until later in the plan period to ensure that a robust housing land supply is maintained, and speculative applications are not made. But, it is argued that if this were the case there would still be speculative application made when the housing delivery tails off and therefore it would be better to maintain larger housing supply to ensure a consistent delivery over the plan period.
- 3.14 Whilst it is appreciated that it is appropriate to consider brownfield first before greenfield in terms of where development should be directed to, it is considered that taking a brownfield first approach to phasing is not. This is due to there being several complex brownfield sites (particularly within the city centre), it is considered that the proposed phasing could prevent much needed homes coming forward in the early years of the plan period. Paragraph 9.24 of the Regulation 19 Local Plan Consultation states that *'Brownfield sites, which often have a long lead in time in terms of delivery have been specifically phased towards the earlier parts of the Plan period...'*. This rationale is not understood nor supported. Such a strategy could result in the under delivery of much needed homes in the early years of the plan period, which could result in speculative applications on unallocated and potentially unsustainable sites within the District.
- 3.15 The 12 sites which are prevented from being permitted for development until after April 2030, are all considered to be unconstrained, sustainable sites in accessible locations which are well-related to existing settlements. These would provide a positive and fundamental contribution towards the local housing need. It is therefore considered that the proposed phasing is overcautious, not justified and inconsistent with the Government's aim to deliver 1.5 million homes in the next 5 years or significantly boosting the supply of homes as required by Paragraph 60 of the NPPF. Further, as of 15 July 2024, 1,609 households were registered on Winchester City

Council's Housing Register with the average wait time being 1 year and 5 months. As such, as currently drafted, the Regulation 19 Local Plan does not meet the current of future housing requirement and therefore fails tests of soundness as set out in Paragraph 35 of the NPPF. To the author's knowledge, there have been no recently adopted Local Plans which apply a phasing approach which prevents sustainable development coming forward until later in the plan period. This is believed to be because such an approach would be found unsound at examination.

3.16 The 'Effect of phasing on Housing Trajectory' graph on page 218 of the Regulation 19 Local Plan, extracted below, details that without the proposed phasing there will be a significant boost in the delivery of housing from 2025/26 to 2031/32. This increased level of delivery is wholly in accordance with the Government's aim to deliver 1.5 million homes in the next 5 years and therefore this alone demonstrates why the proposed phasing set out in Strategic Policy H2 should not be allowed or found sound once the Local Plan is submitted for examination.



**'Effect of phasing on Housing Trajectory' graph - page 218 of Regulation 19 Local Plan**

3.17 Further, it is highlighted that the land adjoining to 85 Church Lane allocated by Policy CC4, has the proposed suppressive phasing clause within the policy which is unjustified. The landowner is committed to seeking to support and help achieve the Government's aim to increase housing delivery over the next 5 years and therefore emphasise that the proposed allocation could come forward in the near future which would further boost Winchester's housing supply in the short term.

- 3.18 As highlighted by Paragraph 70 of the NPPF, *'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'*. Additionally, the PPG states that *"strategic policy-makers should ensure there is not continued delay in meeting identified development needs"*. Therefore, this must be considered in terms of how achievable, available, suitable, and therefore deliverable sites - including greenfield sites - can be achieved at any point of the Plan period, and should not be prevented from coming forward until brownfield sites have been delivered.
- 3.19 In summary, the phasing of the development is actively suppressing the delivery of housing when the need should be met immediately.
- 3.20 In the light of the above comments, we urge the Council to remove the proposed phasing set out in Strategic Policy H2. Together with the removal of the proposed phasing and restriction of 12 greenfield sites coming forward before 2030, we suggest the Council seeks to allocate a range of further sites to boost and bolster the housing land supply throughout the plan period.
- 3.21 It is confirmed that the land allocated by Policy CC4 can deliver the 10 homes within 12 months from commencement of development. It should therefore not be held back from making an important and early contribution to Winchester's Housing Supply.

#### *Strategic Policy H3*

- 3.22 Strategic Policy H3 sets out the housing proposed for each spatial area. It is noted that Colden Common is included in the 'Large Rural Settlements' spatial area and only just over a third of the housing provision for the area is coming from new proposed housing allocations.
- 3.23 We fully support the allocation of the land adjoining to 85 Church Lane for 'about 10 dwellings' in the Regulation 19 Local Plan. Section 3 provides further details on

#### 4.0 [Response to Policy CC4](#)

- 4.1 Policy CC4 allocates the land adjoining Church Lane for 'about 10 dwellings' which is strongly supported.
- 4.2 The site is well related to Colden Common. It lies at the end of a row of housing and opposite housing. There are field boundaries containing the site. The proposed site forms a logical extension to the built up area following the grain of the settlement. The site has good visibility splays from its existing access and there is a pavement for pedestrians to use. It is good housing candidate site.
- 4.3 The policy wording states that '*The development is phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030.*' The proposed phasing of the development is not considered to be in accordance with the current NPPF or the Government's aspirations. As such, this requirement should be removed from the policy and all other policies where this phasing restriction is suggested to ensure that the Local Plan is found sound. Particularly given the over reliance on complex brownfield sites, in order to maintain a robust housing land supply and deliver the required homes, sustainable sites should not be prevented from coming forward in the early years of the plan.
- 4.4 Requirements of the access to the proposed development as set out in the policy are considered to be acceptable and in accordance with the applicant's aspirations to create high quality developments which encourage the use of sustainable transport and promote healthy active lifestyles. In addition to the access requirements, Policy CC4 sets out criteria for environmental requirements. All of these criteria have been reviewed and as previously mentioned several technical surveys and reports have been undertaken and it is believed that all of these policy requirements are achievable.
- 4.5 The criteria relating to other infrastructure are duly noted and the development will of course make the required Community Infrastructure Levy payment and if there is a need to provide a financial contribution to further infrastructure, this will be discussed during the consideration of a future planning application.

## 5.0 Conclusion

- 6.1 We strongly support the allocation of the land adjoining 85 Church Lane as set out in Policy CC4 and urge the Council to remove the proposed phasing included in the policy to ensure the site comes forward in the early stages of the plan.
- 6.2 The NPPF sets out that plans should be positively prepared in a way that is aspirational but deliverable. It is considered that as currently drafted, the emerging Local Plan Review is not positively prepared in accordance with paragraph 35 a) of the NPPF and is therefore unlikely to assist the Government in its objective to significantly boost the supply of new homes. The draft Local Plan does not appear to have fully assessed the existing allocations to understand why they have not been delivered to date, but simply rolled them forward, and also included sites which have already been completed.
- 6.3 Further, the capacity of the proposed site allocations does not appear to have taken into account the mandatory requirement for BNG and this impact on potential housing numbers. It is therefore considered that the Council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply over the plan period.
- 6.4 As expressed throughout these representations, the Council should not seek to prevent deliverable greenfield sites from coming forward in the early part of the plan period and therefore the proposed restriction should be removed from the 12 sites it is currently applied to.
- 6.5 In accordance with the definition of 'deliverable' within the NPPF (2023), the land adjoining 85 Church Lane is available for development now, it is a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within two - five years following its allocation.
- 6.6 We trust the information contained within these representations is sufficient, however should you require any further information please do contact us.