

REPRESENTATION TO THE WINCHESTER CITY COUNCIL PROPOSED SUBMISSION (REGULATION 19) LOCAL PLAN CONSULTATION

IN RELATION TO LAND AT WESTHILL ROAD NORTH, SOUTH WONSTON FOR BEECHCROFT LAND LIMITED OCTOBER 2024

REPRESENTATION TO THE WINCHESTER CITY COUNCIL PROPOSED SUBMISSION (REGULATION 19) LOCAL PLAN CONSULTATION IN RELATION TO LAND AT WESTHILL ROAD NORTH, SOUTH WONSTON FOR BEECHCROFT LAND LIMITED

Prepared for

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VERSION CONTROL

VERSION	DATE	DESCRIPTION	CREATED BY	REVIEWED BY
1.0	09.10.2024	First Draft	G.EB	G.W
1.1	11.10.2024	ISSUE	G.EB	G.W / I.T

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1. INTRODUCTION

- 1.1 This representation has been prepared by Ridge and Partners LLP on behalf of our client, Beechcroft Land Limited, to support representations to Winchester City Council's Regulation 19 Local Plan Consultation running until the 13th of October 2024.
- 1.2 The consultation invites input from the community to steer the plan to adoption. It is the intention that the adopted Local Plan will set out Winchester City Council's (WCC) long-term plan for the Winchester District until 2040, outside the South Downs National Park. The Local Plan addresses a range of matters: the climate emergency, the highest standards possible for environmental design for homes and for commercial development, affordable housing, low carbon methods of transport and the natural and historic environment.
- 1.3 The Regulation 19 plan has made site allocations to meet the identified need. One such site includes Land at West Hill Road North, South Wonston (hereby referred to as 'the subject site'). Policy SW01 of the emerging plan confirms that the site is allocated for "about" 40 dwellings, however, the policy also states that the development is phased for the latter part of the Local Plan period, whereby planning permission for housing development will not be granted before 2030.
- 1.4 In response, this representation provides support for this allocation, however, makes the case that a higher quantum of development can be achieved at the site. This representation also objects to the late phasing of the proposed development and includes reasons as to why the development of the subject site should be brought forward for immediate release.
- 1.5 This representation follows previous representations made in connection with the subject site on behalf of our client, including a response to the council's Regulation 18 Consultation Plan in November 2022. As well as a response made in April 2021 directly to the Council's Strategic Issues and Priorities Consultation document which was published as part of the emerging Local Plan consultation.
- 1.6 Following this introduction, a brief description of the site and surrounding area will be provided in Section 2 and Section 3 will provide details of Policy SW01. Section 4 will provide support to Policy SW01 whilst Sections 5 and 6 will outline the elements for the objection before providing conclusions and recommendations in Section 7.

1.1.7.

2. SITE AND SURROUNDING AREA

Site Location

- 2.1 The subject site is held under an option to Beechcroft Land Ltd who are actively promoting the site for residential purposes.
- 2.2 The subject site is located towards the northwest of the village of South Wonston adjacent to its existing settlement boundary, to the south of Alresford Drove and west of West Hill Road North.
- 2.3 Currently comprising 1.8 hectares of agricultural land, the subject site is void of any built form or significant vegetation. It is generally flat and has some established trees and hedgerows along some of the boundaries.
- 2.4 The subject site is bound by existing properties to the south and southeast with open space to the west. The northern boundary of the site is formed by Alresford Drove, beyond which are allotment gardens.
- 2.5 Access to the subject site is obtained via West Hill Road North.

Facilities and services

- 2.6 South Wonston enjoys a number of facilities including the following:
- Convenience Stores x2
- Pre-school/nursery x2
- Primary School x2
- Dentists x2
- Community Village Hall
- Pub/Social Club x1
- Daily Bus Services x3
- Children's Play Areas and parks' open spaces
- Outdoor Sports Facility
- Church
- Warehouses x2; and
- Workshops x2.

2.7 Paragraph 14.174 of the draft plan for consultation sets out that advice from the Local Education Authority has indicated that it is likely that the development could be accommodated within the existing primary provision.

Accessibility

- 2.8 South Wonston is relatively well-connected and central to the larger settlements of Winchester, Whitchurch and Andover. The City of Winchester is located approximately 8km to the south of the village which is accessible by public transport via bus service 86 (32-minute journey) and the A34 and Andover Road North. The town of Whitchurch is located approximately 14km to the north and can also be accessed via bus service 86 (32-minute journey). The town of Andover is located approximately 20km to the northeast and can be accessed via Whitchurch. All settlements that are within accessible distance of each other offer several key facilities.
- 2.9 In addition to this, the M3 Winchester Interchange at Junction 9 is approximately 10.9 miles southeast, providing connections to Southampton (approx. 30-minute drive), Basingstoke (approx. 25-minute drive) and London (approx. 90-minute drive). The A34 provides a direct link to Newbury which is approximately a 25-minute drive.
- 2.10 There are a number of bus stops within the village, the closest to the subject site is that to the south along West Hill Road North. This stop marked as 'Wonston (Hants), adj. Waverly Drive' provides access to the number 86 local bus services. This service operates between Winchester and Whitchurch via Fulfood, Weeke, Harestock, Littleton, Worthy Down, South Wonston, Wonston, Sutton Scotney, Upper Billington and Tufton on a frequent and regular basis.
- 2.11 The subject site is therefore located in a sustainable position.

Designations

2.12 The site is free of constraints; it is not the subject of any ecology, landscape or heritage designation and the site falls within Flood Zone 1 the development of which is at the lowest risk of flooding and is preferred by planning policy.

Planning History

2.13 There is no planning history of relevance to the site.

3. POLICY SW01 – LAND AT WEST HILL ROAD NORTH

3.1 Strategic Policy D4 of the Reg 19 plan confirms the design principles for Market Towns and Rural Villages. Policy SW01 of the Reg 19, allocates the subject site for residential development, and in full states the following:

Land at West Hill Road North, as shown on the Policies Map, is allocated for the about 40 dwellings. Planning permission will be granted provided that details accord with the Development Plan and meet the following specific requirements:

Nature & Phasing of Development

- *i.* The development is phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030;
- ii. Provide an overall site plan indicating the general siting of development, open space, landscaping and access points that minimises wider landscape impacts, provides vehicular and pedestrian and cycle access to the site and indicates linkages to The Drove Road PROW/existing footpaths around the site. Any applications for all or part of the site should demonstrate how the proposal will accord with these principles and achieve the form of development intended by this allocation as a whole;

Access

- *iii.* Provide a vehicular access to the site from West Hill Road North at a safe distance from Alresford Drove;
- *iv.* Provide new footpath/cycleway links at the south-eastern edge of the site to connect with existing routes into the village centre;
- v. Provide pedestrian/cycle links through or around the site to the Drove Road PROW;

Environmental

- vi. Retain and enhance existing planting/trees/hedgerows around the borders of the site except where their removal is necessary for access and visibility purposes and increase screening with additional planting;
- vii. Provide landscape buffers to protect the amenities of existing properties to the south of the site and any wider views from South Wonston village to the north;

- viii. Provide on-site, informal green space and children's play space in accordance with the approach set out in policy NE3;
- *ix* Provide a lighting scheme to enable a secure environment for residents and users of the site and minimises light pollution and visual intrusion into the wider countryside area;

Other Infrastructure

- Provide a connection to the nearest point of adequate capacity in the sewerage and water supply network and/or make arrangements for appropriate water drainage/disposal in collaboration with the service provider;
- xi Ensure that the groundwater Source Protection Zone is protected;
- xii Contribute to infrastructure needed to make the development acceptable in planning terms including addressing any need for education provision (Primary and Secondary) to meet the needs of the development.
- 3.2 The supporting text in paragraphs 14.169 to 14.176 of the emerging plan justifies the allocation.

4. SUPPORT FOR THE PROPOSED ALLOCATION

4.1 As above, we support the proposed allocation of the site for residential development through policy SW01, for the following reasons.

Distribution of Development

- 4.2 Firstly, we agree with the approach being taken in the plan regarding the distribution of development across the district, including the provision for at least 4,250 dwellings in market towns and rural areas.
- 4.3 The Development Strategy and Site Selection Topic Paper which has been prepared to provide background to and justification for the policies in the Proposed Submission Local Plan and to respond to representations which were received during the Reg 18 consultation, sets out the approach to the development strategy and how it has changed since the last consultation:

The SIP consultation set out four potential approaches to an updated development strategy in the Local Plan. Full details are in the SIP document but briefly, they were as follows:

Approach 1 - Existing local plan settlement hierarchy

Approach 2 - Focus on Winchester Town

Approach 3 - Strategic allocation or new settlement

Approach 4 - Disperse development in proportion to settlement size...

... A hybrid option, based upon approach 1 but with elements of 2 and 4, was developed. This was subjected to initial testing through further consideration of the Settlement Hierarchy Update ; the availability of suitable, sustainable sites in each settlement; the presence of any "showstoppers" or constraints, for development; the initial sustainability appraisal of potential allocations in each settlement; and discussions with town and parish councils. Together this further refined the emerging strategy to that presented and discussed at LPAG, resulting in the regulation 18 draft Local Plan's proposed housing distribution as follows –

- Winchester Town 5,670 dwellings
- South Hampshire Urban Areas 5,700 dwellings

• Market Towns and Rural Area 4,250 dwellings (of which 500 to be delivered in the South Downs National Park Local Plan area).

...Following publication of the regulation 18 draft Local Plan, the Partnership for South Hampshire (PfSH) published a Spatial Position Statement in December 2023 . This identified an overall unmet housing need of some 11,000 dwellings. The Statement outlined that the PfSH authorities are taking a twostage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full.

Stage one – some authorities (including Winchester) should be able to meet and potentially exceed their housing needs in their plan area. 4.8 Stage two - in the longer term, Broad Areas of Search for Growth will be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub-region. One of those is East of Botley which falls within Winchester District. It is intended that this broad area will be tested through the next plan process to see if it should be included in the next review of the Local Plan.

Therefore, in broad terms, the proposed submission plan sets out a development strategy broadly similar to that in the regulation 18 draft Local Plan, with changes largely arising from an evolving understanding of the opportunities presented in each site and settlement.

- 4.4 We are supportive of this approach as it is consistent with the guidance contained within the National Planning Policy Framework. Specifically, paragraph 83 which is clear that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. As well as paragraph 70 which sets out that 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.
- 4.5 It is recognised that a number of responses were made which questions the development strategy, including some which question the total quantum and location of development. These are summarised and listed in the Development Strategy and Site Selection Topic Paper, and includes *"the settlement hierarchy used to inform the development strategy is inaccurate and should not have resulted in allocations in places such as South Wonston".*
- 4.6 We consider that the Reg 19's allocation for residential development in South Wonston is wholly appropriate in the context of the above distribution of development and supported for the reasons given below.

Settlement Hierarchy and Residential Development at South Wonston

4.7 We agree with South Wonston's categorisation within the 2022 review of the settlement hierarch and the settlement's capacity to accommodate residential development.

- 4.8 The Settlement Hierarchy Review (September 2022) forms part of the evidence for the Local Plan 2040. It has resulted in some minor rescoring of settlements and in one instance led to the recategorization of a settlement, in no other cases has the review resulted in a recategorization of a settlement or indicated a different approach should be taken. South Wonston continues to be categorised as an intermediate rural settlement. This is due to scoring 20 in the scoring methodology. Notably 18 of these points are scored in the daily facilities category, which assesses settlements based on them containing key facilities and services across retail, education, public transport, superfast broadband, employment opportunities, recreation and open space, and facilities for communities to congregate. Winchester is the only settlement in the district to obtain a higher score for daily facilities.
- 4.9 Additionally, as presented in our previous representation, not only is South Wonston therefore a demonstrably sustainable settlement to accommodate residential development, but the allocation of additional housing will also help meet the identified needs of the parish. It has been established locally through the Verification of Housing Need report that there is a community need for the provision of market and affordable housing which this scheme would provide for. Thus, it is our view that the additional housing within South Wonston would realise local community aspirations.
- 4.10 For these reasons we agree with the Settlement Hierarchy Review and Regulation 19 plan that South Wonston is a sustainable location for residential development and moreover residential development at the settlement will help meet the recognised needs of the parish.

Suitability of the Subject Site

- 4.11 Following from the above, we support the site's allocation for residential development through Policy SW01 (which is stated in full above).
- 4.12 The Development Strategy and Site Selection Topic Paper provides further detail on the process by which the proposed allocations in the proposed submission (regulation 19) plan were arrived at. For South Wonston it states the following:

South Wonston

South Wonston is assessed as an intermediate settlement in the 2024 Settlement Hierarchy, with a moderate level of services and facilities. The 2023 SHELAA identified four sites adjacent to the settlement with a total estimated capacity of 291 dwellings. Each site was assessed against the sustainability criteria set out in the Integrated Impact Assessment (IIA). Full details of these assessments are available in Appendix F of the Integrated Impact Assessment to the settlement, but the headline assessments for those which fall within or adjacent to the settlement are set out in the table below. The criteria used, and categorisation of likely impacts is set out in paragraphs 5.3 and 5.4 of this report.

Site (IIA ref)	IIA1	IIA2	IIA4	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
SW01	-	-	+	-	0?	-	-?	0?	-	-	0
SW02	-	-	+	-	0?	-	0?	0?	-	0	0
SW03	-	-		-	0?	0	0?	0?	-	-	0
SW07	-	-		-	0?	0	-?	0?	-	-	0

Sites were considered in accordance with the methodology set out in section 5 of this document. Individual assessments of sites are set out in the SHELAA and IIA. Initial assessments of the impacts of proposed allocations upon the historic environment, transport (highways) and landscape form appendix 3 of this document. 6.45 It is considered appropriate to identify a new site to deliver about 40 dwellings. The details of the site are as follows –

Site name	Reference		Rationale for inclusion and any comments					
	2023 SHELAA	Draft Plan						
Land at West Hill Road North	SW07	SW01	Site is visually sensitive but offers the opportunity to deliver homes with pedestrian and cycling access to the centre of the village. Provision of open space on site will improve formal and informal recreation services in this area of the village.					

Other sites

Examination of the SHELAA sites in the vicinity of South Wonston indicated that there would be difficulties achieving suitable vehicular access on many of the sites. Site SW05 was also suggested as a possible allocation, however it is too remote from South Wonston and not sustainably located in relation to nearby settlements. 5.7 Although not specifically referenced in the 2022 Background Paper, the Regulation 18 Draft local Plan also included a boundary change at Chaucer Close ad this is included in the Proposed Submission Plan.

- 4.13 This allocation is fully supported at this location as it offers an opportunity for South Wonston to grow in a logical manner (providing a logical rounding-off of the built-up area) which is consistent with the existing settlement pattern of the village. In addition to this, development in this location will inherently support local services and facilities, particularly as it borders the existing built form and is in close walking distance to existing services and facilities, as recognised above.
- 4.14 The subject site sits towards the northwest of the village of South Wonston adjoining the village's settlement boundary. Whilst outside the existing settlement boundary, it is evident that this location is sustainable for residential development and offers a logical rounding off to the village with existing development on 3 of its 4 boundaries.

5. SUGGESTED AMENDMENT TO THE QUANTUM OF DEVELOPMENT PROPOSED IN POLICY SW01

- 5.1 Despite the general support for the allocation of the site for residential development, this representation seeks an amendment to the quantum of units proposed in policy SW01.
- 5.2 Policy D6 is also relevant in this instance, as relates to density and making the best use of land, it states that:

In order to ensure that development land within existing settlements is used most effectively, the local planning authority will prioritise development of previously developed land, **and expect higher densities where appropriate on sites which have good access to facilities and public transport**, particularly within the urban areas. **The development potential of all sites should be optimised**, consistent with the need to promote the delivery of high quality, well designed places. The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.

[Own Emphasis]

- 5.3 In this vein it is also considered that this policy can be further strengthened to better accord with the aims of the NPPF in making the most efficient use of land, below.
- 5.4 In terms of higher densities being appropriate on sites which have good access to facilities and public transport it has been demonstrated above that the site is located within walking distance of the high scoring daily facilities within South Wonston, and equally to public transport opportunities. The site is sustainably located and as per provisions of policy D6 warrants the optimisation of its development potential.
- 5.5 NPPF Chapter 11 is focussed on making an effective use of land, with paragraph 128 clear that decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it

5.6 In terms of paragraph 128 of the framework the following chapter demonstrates the need for the development in South Wonston and the lack of other suitable sites to accommodate it. Adding further weight to the notion that there should be an allowance for density of development at this site should be increased where possible.

- 5.7 At a density of 30dph the site, which is free of constraint, is capable of delivering 54 dwellings, whilst also providing the requisite amount of open space, landscaping and access points.
- 5.8 The site is allocated for "about 40 dwellings" in policy SW01, it is considered that this policy should be amended to read "a minimum of 40 dwellings" to better align with policy D6 (which itself could be strengthened) and NPPF guidance, particularly at paragraph 128.

6. **OBJECTION TO THE PROPOSED PHASING OF THE SITE**

6.1 Policy SW01 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.

- 6.2 This representation objects to the imposed phasing of the site as set out below.
- 6.3 In regard to the phasing of the plan's allocations paragraph 9.23

'The strategic allocations, along with new allocated sites and some windfall provision, will continue to be built out into the second half of the Plan period, but it is necessary to phase the greenfield allocations towards the latter parts of the Plan period so as to maintain a reasonable level of provision in these phases and prevent all housing provision from being built out in the early years of the Local Plan.'

6.4 Policy H2 of the RCP confirms:

Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by **holding back** <u>most</u> allocated greenfield sites until the later parts of the Plan period. The following sites will 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:.

[Own emphasis].

6.5 This representation contends that it is unreasonable to hold back the delivery of the site as there is a recognised unmet need currently in South Wonston, as well as the holding of sites to be contrary to national planning guidance.

Housing Need in South Wonston

- 6.6 It has been identified locally that there is a need for additional housing within the Parish as identified in recent survey work. The South Wonston Feedback Report (2019) identifies the subject site as a preference of the local community.
- 6.7 According to South Wonston Village Design Statement 2014 (SWVDS), the last significant growth in the village was during the 1980s when the settlement expanded in an easterly direction. Since this expansion, the only form of additional residential development has been isolated examples of developments in rear gardens and a small group of affordable houses (La Frenaye Place) built on a

rural exception site outside the settlement boundary in excess of 20 years ago. The Winchester City planning register indicates that there has been no further significant residential development since the publication of the SWVDS in 2014.

- 6.8 Furthermore, the table on page 483 of the Reg 19 plan confirms that Net Completions in or adjoining the settlement (2020 – 2023) have totalled just 4. Outstanding permissions (in 2023) total just 2. It is evident therefore that there has been a lack in the provision of new homes in the village in recent years.
- 6.9 Policy SW01 allocates the subject site for residential development for around 40 homes. The need for new residential development in this area has therefore been recognised and accepted by WCC. As above, it is evident however that WCC has proposed that the site should not be released for development until after 2030. Policy SW01 is the only residential allocation for the village. There are very few brownfield sites available within the village and none that would meet the existing affordable needs of the settlement. As such it is contended that the immediate identified need for residential development will be further delayed. Indeed, the parish housing needs were identified more than 8 years ago now.

National Planning Policy Guidance

- 6.10 As above, the Framework emphasises that the purpose of the planning system is to deliver sustainable development and boost the supply of housing. Throughout the Framework, emphasis is placed upon the necessity to deliver homes without delay. Paragraph 60 of the Framework sets out that the Government's objective is to significantly boost the supply of homes and it is important that a sufficient amount and variety of land can come forward where it is needed 'with permission developed without unnecessary delay'. Paragraph 70 confirms that medium-sized sites can make an important contribution to meeting the housing requirement of an area 'and are often built out relatively quickly'.
- 6.11 In respect of rural housing, paragraphs 82 and 83 confirm that planning policies should be responsive to local needs pointing out that new housing should be located where it will enhance or maintain the vitality of rural communities.
- 6.12 Much of the advice contained within the Framework is echoed in the PPG 'Rural Housing' (July 2019) which identifies that new housing can be important for the broader sustainability of rural communities.

Deliverability of the Site in the Short Term

6.13 Annexe 2 within the Framework defines 'deliverable' as the following:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."

6.14 The following demonstrates the site's deliverability as per the definition above.

Available

6.15 The site currently comprises undeveloped land. It is being promoted by Beechcroft Land Limited who have an option with the landowner to bring the site forward. There are no known legal, ownership or other constraints which would prevent the site from coming forward in a timely manner or limit development. The site can, therefore, be considered to be developable and available now.

Suitable

- 6.16 The site offers an opportunity for South Wonston to grow in a logical manner which is sympathetic of the existing settlement pattern of the village. In addition to this, development in this location will inherently support local services and facilities, particularly as it borders the existing built form and is in close walking distance to existing services and facilities.
- 6.17 With reference to access, it is considered that safe and suitable access can be achieved from West Hill Road North to serve the residential use being proposed. Furthermore, the site is located to a range of services and facilities, including a bus service which links the village to larger settlements.
- 6.18 The subject site is not subject to any flood risk.
- 6.19 The subject site sits within the apex of the existing village being bound to the south and east by existing development and to the north by Alresford Drove. The subject site's western boundary is open to the countryside but is defined by a strong historic hedgerow. The subject site, therefore, has a strong framework which would aid the development's integration with the existing village whilst upholding the character and appearance of the countryside beyond. Accordingly, the site is a suitable location for residential-related development and rounds off the existing settlement in a logical manner.
- 6.20 The subject site is therefore suitable in terms of its location for residential development at the current time and has no physical constraints to prevent or delay its development coming forward now.

Achievable

6.21 This site sits adjacent to and expands beyond an existing settlement boundary with facilities and services within walking distance. The allocation would enhance the vitality of South Wonston and inherently support nearby facilities and services. As demonstrated throughout this representation, residential use at the site represents a viable future use for the site and this can be delivered quickly on this site. There are no constraints which would hinder the development of this site. As such, the development of the site for new homes can be considered achievable within 5 years.

Conclusions on the Objection to the Proposed Phasing of the Site

6.22 There is an evidenced unmet need for new homes in South Wonston with national planning policy clear that to support the government's objective to significantly boost the supply of new homes it is important that a sufficient and variety of land can come forward and is developed without unnecessary delay. The site has been demonstrated to be deliverable in the short term and it is therefore considered that the rationale to delay any permission on site until 2030 is flawed and the imposed phasing should be removed.

7. CONCLUSIONS

- 7.1 This document has been prepared by Ridge and Partners LLP on behalf of our client, Beechcroft Land Limited, to support representations made to Winchester City Council's Regulation 19 Local Plan Consultation running until the 13th of October 2024.
- 7.2 The Regulation 19 has made site allocations to meet the identified need. One such site includes Land at West Hill Road North, South Wonston (hereby referred to as 'the subject site'). Policy SW01 of the emerging plan confirms that the site is allocated for "about" 40 dwellings, however, also states that the development is phased for the latter part of the Local Plan period, whereby planning permission for housing development will not be granted before 2030.
- 7.3 In response, this representation provides support for this allocation, however, makes the case that a higher quantum of development can be achieved at the site. This representation also objects to the late phasing of the proposed development and includes reasons as to why the development of the subject site should be brought forward for immediate release.
- 7.4 This allocation is fully supported at the site as it offers an opportunity for South Wonston to grow in a logical manner (providing a logical rounding-off of the built-up area) which is consistent with the existing settlement pattern of the village. In addition to this, development in this location will inherently support local services and facilities, particularly as it borders the existing built form and is in close walking distance to existing services and facilities. The subject site sits towards the northwest of the village of South Wonston adjoining the village's settlement boundary. Whilst outside the existing settlement boundary, it is evident that this location is sustainable for residential development and offers a logical rounding off to the village with existing development on 3 of its 4 boundaries.
- 7.5 The site is allocated for "about 40 dwellings" in policy SW01, it is considered that this policy should be amended to read "a minimum of 40 dwellings" to better align with policy D6 (which itself could be strengthened) and NPPF guidance, particularly at paragraph 128.
- 7.6 There is an evidenced unmet need for new homes in South Wonston with national planning policy clear that to support the government's objective to significantly boost the supply of new homes it is important that a sufficient and variety of land can come forward and is developed without unnecessary delay. The site has been demonstrated to be deliverable in the short term and it is therefore considered that the rationale to delay any permission on site until 2030 is flawed and the imposed phasing should be removed.





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