

Planning Policy Team
Winchester City Council
City Offices
Colebrook Street
Winchester
Hampshire
SO23 9LJ

11/10/2024

Our Ref:23023
Your Ref:

Dear Sir / Madam,

Formal Representations to Winchester District Local Plan 2020 – 2040 Proposed Submission Local Plan (Regulation 19)

These representations are made in response to the Winchester Proposed Submission Local Plan 2020 – 2040 (Regulation 19) on behalf of Cala Homes (Southern) and comprise this letter and the enclosed Vision Statement (October 2024).

Our client has previously made representations in response to the Regulation 18 Local Plan, which was published for consultation in November 2022. Our client has land interests in Land West of Courtenay Road, Winchester which is identified as a residential allocation under Policy W4 of the Regulation 19 Draft Local Plan. This site is fully within our client's control and there are no legal or viability issues to prevent this site coming forward in the next 5 years.

Notwithstanding our client's land interests these representations have been prepared in recognition of the prevailing planning policy and guidance, in particular the National Planning Policy Framework, 20th December 2023, Planning Practice Guidance (PPG). Consideration is also given to the draft NPPF (July 2024) as this is of relevance to the Government's response to the housing crisis and expectation for Local Authorities to 'make every effort to allocate land in line with their housing need as per the standard method'¹.

These representations provide a response to the following policies of the Winchester Proposed Submission Local Plan (Regulation 19).

- **Policy W4 Land West of Courtenay Road**
- **Policy H2 Housing Phasing and Supply**

¹ Written Ministerial Statement 30.07.24

The enclosed Vision Statement provides our client's vision for a new sustainable neighbourhood and also serves as a strategic planning document. The Statement provides information in support of the proposed site allocation (Policy W4 Land West of Courtenay Road) alongside the extensive range of evidence prepared by the Council. The Statement has been informed by site masterplanning and a range of technical assessments relating to transport, ecology / biodiversity, landscape, utilities, drainage and noise. This range of work confirms the sustainability and deliverability of the site and refines the Council's assessment of site capacity. This range of work confirms that the site allocation can come forward for 160 dwellings, rather than 'about' 150 dwellings stated in the current draft Policy W4. This will also make a greater contribution to unmet housing need in the area including the Partnership for South Hampshire (PfSH) area.

These representations highlight a need for amendments to policies W4 and H2 of the Submission Local Plan to deliver a higher level of housing with phased delivery during the first half of the plan period. I consider that the proposed changes would improve the soundness of the Plan.

Paragraph 35 of the NPPF states that, for a Plan to be found 'sound' it must show that it is:

- *Positively prepared – providing 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;*
- *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

Response to Winchester Proposed Submission Local Plan (2020 – 2040) (Regulation 19)

Policy W4 Land West of Courtenay Road

Cala Homes support the residential allocation of Policy W4 'Land West of Courtenay Road'. Winchester is the largest settlement in the district and the main focus for growth in the Local Plan settlement hierarchy. Winchester is a hub for many services and facilities, which benefit residents and businesses in the district and beyond. The site is sustainably located on the settlement edge of Winchester and within walking and cycling distance to primary and secondary schools, public open spaces / play facilities, leisure facilities, health facilities, local shops, Winchester Town Centre, public houses and other community facilities. ²The site is also located directly adjacent to the Kings Barton strategic allocation and benefits from accessibility to a range of key services and facilities including primary school, foodstore, health facilities, community building and strategic open space.

The site is well contained and forms a natural extension to the settlement boundary in this location and maintains the integrity of the Kings Worthy / Headbourne Worthy Settlement Gap. It is bounded to the east and west by existing and future housing forming Courtenay Road and the Kings Barton

² Land West of Courtenay Road Vision Statement, I-Transport Accessibility Plan (October 2024).

development respectively. This is confirmed through the Council’s Landscape Gap Study undertaken to inform the Local Plan³ and through the Landscape Assessment⁴ undertaken by Green Landscape Studio (on behalf of Cala Homes) as set out in the submitted Vision Statement.

Vehicular access to the site is served from Courtenay Road via Stoke Road. The Winchester to London railway line runs adjacent to the western boundary with a foot/cycle connection beneath providing permeability with the Kings Barton development. The site is also well connected to the regional road network from Winchester including the M3 and M27.

Our client is supportive of draft Policy W4 subject to amendments that are required to the policy to ensure it is ‘sound’ and to reflect the latest technical work undertaken by Cala Homes. The following objections are raised to the policy as currently drafted:

We object to the Council’s assessment of site capacity for ‘about’ 150 dwellings. Master Planning prepared for the site and submitted as part of the Vision Statement demonstrates that 160 dwellings can be provided for while complying with Policy W4 criteria and delivering a policy compliant housing mix at an appropriate density. We support the use of the wording ‘about’ or ‘approximately’ to provide necessary flexibility at development management stage.

We object to the proposed phasing of the site from 2030. This approach is not justified and fails to take account of flexibility in housing supply required in the next 5 years to take account of potential delays in the implementation of strategic sites, non-implementation of planning permissions and in order to effectively address unmet housing need in the Winchester and wider PFSH regional area.

We object to the site boundary which includes an eastern corridor on the northern edge of the settlement boundary to Worthy Road. A revised settlement boundary⁵ has been submitted as part of these representations which should replace the site boundary included in the local plan policies map and the allocation policy Site Plan and wider context maps.

A transport feasibility assessment has been undertaken for the site, which concludes that appropriate cycle access can be established to the east via Courtenay Road / Stoke Road, linking to the Kings Worthy to Winchester cycleway and there is benefit in this being clarified in the supporting text to the policy. The following amendments are proposed to Policy W4 to improve the soundness of the Plan (changes in bold italic):

Policy W4 Land West of Courtenay Road
Land west of Courtenay Road, Winchester, as shown on the Policies Map, is allocated for the development of about 1560 dwellings and public open space. Planning permission will be granted provided that detailed proposals accord with the Development Plan and meet the following specific development requirements:
Nature & Phasing of Development
i. The development is phased for the <i>first half of the plan period (2020 – 2030)</i> . latter part of the Local Plan period and permission for housing development will not be granted before 2030;
Access

³ Settlement Gap Review, Winchester City Council, Land Use Consultants (July 2024)

⁴ Landscape Assessment, Green Landscape Studio (August 2024) as set out in the West of Courtenay Road Vision Statement (October 2024).

⁵ As set out in the submitted Vision Statement (October 2024)

- ii. Provide for safe vehicular access from Courtenay Road and improve pedestrian and cycle access, including crossing facilities on Worthy Road as necessary;
- iii. Contribute to any other off-site junction improvements as necessary.

Environmental

- iv. Provide on-site flexible, multi- functional accessible informal green spaces (amounting to at least 1.5 hectares) so as to help separate housing from the railway line on the western site of the site, create an attractive and accessible environment and retain the openness of the settlement gap.
- v. Undertake a noise assessment and provide appropriate mitigation to prevent excessive disturbance to the planned residential development from the adjoining railway line; and

Other Infrastructure

- vi. Provide 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.

Supporting Text:

This site adjoins the built-up area of Winchester and totals approximately 5.7 hectares. It is bounded by housing to the east, allotments to the south, and the railway line and Barton Farm (Kings Barton) development to the west, so it is well- related to the facilities and services being provided within Barton Farm.

To the north is an important tree belt for bats and beyond this the Barton Meadows Nature Reserve which was provided in conjunction with development at Barton Farm. The Barton Meadows Nature Reserve is an important corridor for wildlife and creates a wider landscape in which wildlife can travel, contributing to the Nature Recovery Network. Due to the proximity of this site to the Nature Reserve, the scope to enhance the Reserve and manage access to it should be investigated. The site is within the currently defined Winchester to Kings Worthy / Headbourne Worthy settlement gap. However, it is well-contained and suited to development and development would not extend the built-up area beyond its current northern boundary, helping to retain the openness of the settlement gap.

Due to the built-up nature of the surrounding area and to help retain the openness of the site as part of the design process, the design and layout will need to incorporate flexible, multi-functional accessible informal community green spaces (amounting to at least 1.5 hectares). This will help to retain the openness of the settlement gap, separate the housing from the railway line and create an attractive and accessible environment. There is a need to retain and strengthen planting around the site and provide landscaping within it.

Access to the site is from Courtenay Road and pedestrian and cycle access should be provided and improved as necessary to the west (to the Barton Farm development) and to the east, to cross Worthy Road and link with the Kings Worthy to Winchester **cycleway via Courtenay Road / Stoke Road**. The site is located on a principal aquifer and development will need to avoid contamination to this aquifer.

~~In accordance with Policy H2,~~ **The** development of this greenfield site will be phased to take place in the **first second** half of the Local Plan period **(2020 – 2030) (2030 onwards)**. ~~This is particularly~~

~~relevant given the importance of prioritising brownfield sites, including Sir John Moore Barracks, and the fact that much of the Barton Farm development remains to be built.~~

The site lies within the catchment areas of Kings Worthy Primary and Henry Beaufort School. Early discussions should take place with HCC Education in order to establish the need for school provision.

This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council's Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion.

In summary, the proposed new neighbourhood is sustainably located and is deliverable in terms of suitability, availability and achievability, as detailed in the enclosed Vision Statement. However, a range of technical assessments have identified the site allocation could come forward for about 160 dwellings in a policy compliant form. Furthermore, the Plan should include a small change to the allocation boundary and sufficient flexibility in its phasing to allow development delivery within the first five years of the Plan in order to address potential unmet housing need and improve the 'soundness' of the Plan.

Policy H2 – Housing Phasing and Supply

We support the allocation of Policy W4 'Land West of Courtenay Road'. The site is sustainably located on the settlement edge of Winchester and accessible to key services and facilities including primary and secondary schools, retail, health, community and leisure facilities. The site is also well connected to the adjacent Kings Barton strategic allocation and associated range of facilities as set out in our response to Policy W4.

We object to Policy H2 and the proposed phasing of greenfield allocation sites as it is not justified or effective. The draft policy increases the risk of the Local plan housing requirement not being provided for during the plan period, a failure to maintain a 5-year land supply and for unmet housing needs to be effectively addressed. Policy H2 and allocation Policy W4 should be amended with a higher residential capacity of 'about' 160 dwellings phased in the first half of the Plan period.

Policy H2 'Phasing and Supply' sets out the phasing of allocated greenfield sites to the second half of the Plan period 2030 – 2040 unless they are needed to come forward earlier to overcome a district housing land supply shortfall.

The draft Plan states that the rationale for phasing new allocations to come forward post 2030 relates to the need for a balanced housing trajectory across the Plan period and in view of housing supply from completions, commitments and windfall in the first half of the plan period (2020 – 2030). However, this does not take account of potential delays to the delivery of strategic sites and a non-implementation rate for planning permissions requiring further housing supply from greenfield sites which can be delivered without delay in the first 5 years of the Plan period. The draft NPPF (July 2024) is also of relevance which sets out the Government's response to the housing crisis and the expectation for Local Authorities to 'make every effort to allocate land in line with their housing need as per the standard method'. In addressing the housing crisis, providing for LHN and effectively addressing unmet housing need, greenfield allocations should be phased in the first half of the Plan period to ensure housing needs are met.

The draft NPPF also proposes changes to the standard method which will significantly increase the level of unmet housing need in the area. The Regulation 19 Draft Local Plan makes provision for 1,900 dwellings to contribute towards unmet housing need, but this does not address definitive unmet need in the area or the increase in unmet need as a result of proposed changes to the standard method.

There is a substantial unmet housing need from neighbouring authorities including Havant, Portsmouth, Southampton and Gosport Councils which has not been provided for in Winchester district or in neighbouring authority areas. It is anticipated that there will also be unmet housing need from the South Downs National Park in relation to landscape constraints and past rates of housing delivery.

Following the proposed revised NPPF and changes to the standard method there is also significant potential for unmet housing need to arise from Basingstoke and Deane Borough Council, East Hants District Council, New Forest District Council and Test Valley Borough Council. There is also the potential for Eastleigh and Fareham Councils to have difficulty in meeting their needs as part of their Local Plan reviews.

Therefore, there is a need for the Regulation 19 Draft Local Plan to bring forward sufficient greenfield allocations in the first 5 years to provide for Winchester District LHN and to better address unmet housing needs of neighbouring authorities.

It is critical that the Local Plan identifies sufficient housing supply to provide for local housing need (LHN) (derived from the standard method) with an appropriate buffer and to maintain a 5-year housing land supply. There is a need for medium sized greenfield allocations such as Land West of Courtenay Road to come forward in the first 5 years of the plan to maintain a 5-year housing land supply and to contribute to unmet housing need from neighbouring authorities and within the PfSH area. It is precisely sites such as Courtenay Road, which are immediately deliverable and being promoted by an established housebuilder, that are best positioned to address chronic unmet need arising from both Winchester CC and the wider PUSH authorities. The submitted Vision Statement demonstrates that the site is suitable, available and achievable and deliverable in the next 5 years.

I would be grateful if you could confirm receipt of these representations, including attached Vision Statement for Land West of Courtenay Road at your earliest convenience.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

[Redacted signature]

[Redacted name]

Associate
Luken Beck mdp Ltd

[Redacted contact information]