



Winchester District Council
Local Plan 2020-2040

Regulation 19 Consultation

October 2024



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Winchester District Council Local Plan Regulation 19 consultation.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has been involved throughout the plan preparation process of the emerging Local Plan, having previously submitted representations on the Strategic Issues and Priorities consultation in 2021 and the Regulation 18 consultation in December 2022.

1.1.3 Gladman Developments are promoting land east of Main Road, Otterbourne through the emerging Local Plan. The site is a proposed residential site allocation for the delivery of 55 dwellings alongside open space. Gladman have provided detailed considerations of the site and Policy OT01, alongside further site submission information at Appendix 1.

1.1.4 Due to comments raised in this representation, Gladman seek the opportunity to discuss many of these points through the Local Plan examination in due course.

2 NATIONAL PLANNING GUIDANCE

2.1 National Planning Policy Framework

2.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Requiring plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

2.1.2 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

2.1.3 In particular, Paragraph 16 of the Framework (2023) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

2.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Winchester District Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

2.2 Planning Practice Guidance

- 2.2.1 The planning practice guidance (PPG), published by the Government, provides clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes the PPG relate to defining housing need, housing supply and housing delivery performance.

2.3 Emerging National Planning Policy Framework

- 2.3.1 On 30th July 2024, the Government published its proposed reforms to the National Planning Policy Framework for consultation until the 24th September 2024. The proposed revisions include reversing some of the changes introduced by the current December 2023 iteration and the inclusion of new policies. Paragraphs 226-233 of the consultation version of the NPPF propose new transitional arrangements for emerging local plans that are currently in preparation. Due to the plan-making stage the Council is currently at with its emerging Local Plan, Gladman recommends that this consultation and its potential implications on plan-making are considered. The Government is also consulting on a new standard method for calculating housing need, using a stock-based model to support its target of delivering 1.5 million homes over the next five years.
- 2.3.2 Alongside the proposed changes, a Written Ministerial Statement (WMS)¹ was made by Angela Rayner, Deputy Prime Minister and Secretary of State (SoS) for Housing Communities and Local Government, on 30th July 2024 entitled "Building the homes we need". The clear terms of the WMS are a statement of the Government's policy regarding the use and development of land. The WMS reaffirms that the country is in "the most acute housing crisis in living memory". There is a clear tone in the Government's messaging to improve affordability and a commitment to building the 1.5 million homes it aims to deliver over the next five years.
- 2.3.3 These representations have been drafted with reference to the December 2023 NPPF and the associated updates that were made to the PPG; however, it is important to acknowledge the wider potential changes to the planning system in the short to medium term.

3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

- 3.1.1 The Duty to Co-operate, as a legal test, has now been rescinded by the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023. However, engagement with prescribed bodies on relevant strategic and cross boundary matters remains an important part of the plan making process.
- 3.1.2 Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters.
- 3.1.3 Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.4 Gladman welcome WCC's decision to meet some of the unmet housing need arising in the South Hampshire Sub Region, although we're concerned the level of shortfall is not adequately addressed.
- 3.1.5 However, the Integrated Impact Assessment (IIA) and the alternative options considered within the IIA do not include the requirement to include unmet needs from other areas. Options that have been considered include a higher requirement than required, making it unclear as to whether this was responding to unmet need or an outcome of the spatial strategies creating a buffer between the housing need and supply.
- 3.1.6 Gladman seek clarification on WCC's intentions behind the created buffer and whether it is to incorporate some unmet housing need from neighbouring Councils.

¹ PPG Reference ID: 61-001-20180913

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 3.2.2 Gladman support the current iteration of the Winchester District Local Plan Regulation 19 Integrated Impact Assessment which clearly justifies the policy choices and undertakes a comparative and equal assessment of each reasonable alternative.

4 WINCHESTER DISTRICT LOCAL PLAN REGULATION 19

4.1 Background

4.1.1 The Winchester District Local Plan consists of Part 1: Joint Core Strategy (adopted March 2013) which sets out the long-term strategic vision, objectives and the key policies needed to achieve sustainable development up to 2031 and Part 2: Development Management & Allocations (adopted April 2017) which provides detailed development management policies and no strategic site allocations.

4.1.2 The Council commenced work on a new Local Plan in 2018 to account for the future needs of the district and accommodate the Council's climate change agenda.

4.1.3 In general, Gladman are supportive of the Local Plan Regulation 19 document and supporting evidence base. However, it is considered that there are few elements that require amendments or clarification in order to demonstrate a clear and sound strategy in line with Paragraph 35 of the Framework.

4.1.4 The sections that follow below include specific comments from Gladman on the Regulation 19 document and highlight areas that need addressing to deliver a sound and up to date Local Plan.

4.2 Strategic Policy SP2: Spatial Strategy and Development Principles

4.2.1 Gladman support the spatial strategy for growth within Winchester, growth has been distributed equally accordingly between Winchester Town and South Hampshire Urban Areas, while a significant level of growth has also been directed to Market Towns and Rural Areas with 3,850 new homes being proposed. The distribution has allowed sustainable settlements to accommodate growth in line with the proposed settlement hierarchy.

4.2.2 Gladman support the range of development principles that support policy SP2 and deliver high quality homes that are designed to be sensitive to the character and setting of the development sites' local area.

4.2.3 Further to this Gladman acknowledge WCC is working increasingly hard to tackle Climate Change and its associated challenges faced within the District. With this in mind, Gladman delivers highly sustainable developments through incorporating energy efficient design principles throughout development sites as well as ensuring sites are accessible to nearby

services, facilities and employment through an array of public transport options, improved cycling routes and integrated pedestrian routes.

4.3 Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions

- 4.3.1 In principle, Gladman support the Council's aspirations to achieve carbon neutrality and the subsequent associated energy efficiency standards in new developments.
- 4.3.2 However, it is considered that several elements of Policy CN3 require further testing through the Local Plan Viability Assessment in order to ensure that they are justified and effective.
- 4.3.3 The policy sets out a policy requirement for all new residential dwellings to demonstrate net-zero operational carbon. The Net Zero Carbon Targets Evidence Base report by Elementa, Currie & Brown and Etude stated the assumed extra-over costs are 5.8% for these housing schemes.
- 4.3.4 Gladman note the clear sensitivity around the cost increase for such developments and suggest the need for further sensitivity testing as part of the viability study. With costs that vary significantly more than the aforementioned figures, further consideration of its impact on viability will need to be assessed.
- 4.3.5 It is vital for the Local Plan to be compliant with national policy. The written ministerial statement (WMS) published on the 13th of December 2023 states in order to meet deliverable net zero homes, additional costs are needed into building new homes which adds complexity and undermines the economies of scale.
- 4.3.6 The WMS then goes on to mention that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale.
- 4.3.7 Gladman therefore suggest in order to comply with the WMS requirements that further evidence is required to show how these developments will be viable and not restrict the Council's ability to deliver a sufficient supply of market and affordable homes.

4.4 Policy CN4: Water Efficiency Standards in New Developments

4.4.1 Gladman note that Policy CN4 seeks to employ a requirement whereby developments will be required to meet a high standard of water efficiency and for residential developments to be designed to achieve a maximum water capacity use of 100 litres per person, per day. It is noted that this a higher standard than currently required in the adopted development plan and aligns with Southern Water's 'T100 Target'.

4.4.2 While the policy is aspirational and seeks to support supply across a water stressed area, it is not apparent how such measures would be implemented and managed. Further guidance in the form of an SPD might help support and provide clarity on such a policy requirement.

4.4.3 The Solent and South Downs (SSD) Position on Water Efficiency and Planning which was published in 2023 states authorities within the SSD area should '**incorporate policies within their local plans that provide for new residential developments to at least reach an average water consumption of 110 litres per person per day (l/p/d).**' The document further goes on to additionally '**support local plan policies that go beyond 110 l/p/d.**' While development over 110 lpppd is supported, 100 lpppd appears quite a stringent target.

4.4.4 With the increased costs associated with Policy CN4, it is important to note that costs will be further increased to retrofit developments to increase water efficiency standards.

4.4.5 The viability assessment explains the restriction to 100 litres per person per day on the basis that the Council can appropriately demonstrate that the district is within an area of water stress. The report further demonstrates the overall cost impact for this requirement to be **nominal** meaning no explicit cost assumptions are required as of yet.

4.4.6 Gladman suggest further evidence to be provided demonstrating the viability of development with a water efficiency below 100 lpppd and so to ensure development is not to be restricted.

4.5 Policy CN8: Embodied Carbon

4.5.1 Gladman recognises the Council's ambitions around climate change and agree for proposals to undertake an embodied carbon assessment following the RICS Whole Life Carbon Assessment for the Built Environment or through using another nationally recognised assessment.

4.5.2 Gladman suggests the need for flexibility until there is greater accuracy regarding data across different building material types and their embodied carbon.

4.5.3 The results from the above assessments will then be used as a guide to demonstrate what actions have been implemented in the design process to best address embodied carbon.

4.6 Strategic Policy D1: High Quality, Well Designed and Inclusive Places

4.6.1 Gladman appreciates design solutions are to be informed by a contextual survey and analysis of the development site's constraints and opportunities. Gladman takes a creative approach to design to deliver developments that are memorable to both its residents and the wider community.

4.6.2 Gladman takes a contextual approach that involves taking different architectural styles from the local area and creating its own mix of building styles that maintain and enhance the character of the local area. This process avoids development copying its surrounding buildings and enables original developments to come forward.

4.6.3 The National Design Guide: Planning practice guidance for beautiful, enduring & successful places (January 2021), the recently adopted National Planning Policy Framework (2023) and National Model Design Code (updated October 2021) set the framework for the characteristics for creating beautiful, high quality sustainable places.

4.6.4 Gladman endorse the design-led approach to create healthy, safe, green, environmentally responsive, sustainable and distinctive beautiful places, and actively encourage a joined-up coordinated approach between the key disciplines especially landscape, ecology, drainage and masterplanning, and in close liaison with key stakeholders. A range of different disciplines across sectors are involved at an early stage to produce a range of ideas, interventions and solutions to help shape future development.

4.7 Strategic Policy D4: Design Principles for Market Towns and Rural Villages

4.7.1 As stated above Gladman support Policy D1 and the importance of delivering High Quality, Well Designed and Inclusive Places through a design-led approach for development throughout the settlement hierarchy including Market Towns and Rural Villages.

- 4.7.2 Gladman ensures community engagement is undertaken to gather feedback on initial design plans and subsequently incorporate into the final design.

4.8 Policy D7: Development Standards

- 4.8.1 Gladman support the requirements for all developments to comply with national statutory standards relating to environmental quality and the submission of a statement showing how requirements have been met in the design of the development site.

4.9 Strategic Policy T1: Sustainable and Active Transport and Travel

- 4.9.1 Gladman support the requirement for planning applications for development to prioritise a genuine choice of sustainable and active travel modes, alongside the reduction of the reliance on cars. Private cars are the least sustainable form of transport and by promoting more sustainable methods of travel this will help reduce the carbon footprint within the district.

- 4.9.2 The site being promoted by Gladman as shown in Appendix 1 sits within an intermediate rural settlement 'Otterbourne'. Many rural areas lack the option of regular public transport and sustainable travel options therefore relying on private cars as stated in Policy T1. Otterbourne however, is a sustainable rural area that provides a regular bus service every 15 minutes into Winchester City Centre with a journey total of 23 minutes from the site into the centre.

- 4.9.3 The above policy states the Local Plan is to **'focus new development in the most sustainable locations with high quality infrastructure to promote active travel and access to public transport, buses and trains.'** Gladman supports this policy, and the allocation made at Otterbourne for 55 dwellings. However, we suggest the removal of the site from Policy H2 which prevents the development coming forward until 2030 as the settlement has the infrastructure to provide sustainable methods of travel and take on the needed growth in the short term to medium term.

4.10 Strategic Policy NE1: Protecting and enhancing Biodiversity and Natural Environment

- 4.10.1 Gladman recognise the importance of this policy and the need to ensure that an environment is left in a measurably better state than found prior to development. The

statutory requirement to ensure at least a 10% biodiversity net gain on developments was implemented earlier this year.

- 4.10.2 Gladman understand WCC is examining the matter of allocating a new Green Belt in the District. While we understand the need to protect areas of the countryside in the District from development it is already very constrained with the South Downs National Park to the southeast. Further to the National Park there are settlement gaps designated throughout Winchester to prevent settlements from merging and then designated countryside on land excluding the National Park throughout the District. Therefor Gladman believes it is unnecessary to put further development constraints when there are sufficient policies in place as of now.
- 4.10.3 Policy NE1 states the Local Plan is responsible for allocating sites up until 2040 in sustainable areas. Gladman supports the allocation of Policy OT01 on Land East of Main Road for 55 dwellings and the Council's acknowledgment of the site being in a 'sustainable area,' which ensures all aspects of the natural environment and biodiversity are protected and enhanced.

4.11 Policy NE4: Green and Blue Infrastructure

- 4.11.1 The site promoted by Gladman in Otterbourne would meet policy NE4 with its well-planned green infrastructure integrated throughout. Our proposal for the site offers the Woodland Walk in the western part of the site which is connected to the wider development site by a proposed footpath.
- 4.11.2 Further to this the eastern side of the development site can be retained as green and blue infrastructure, there is a PRow travelling through the green space that offers a larger area of green infrastructure which incorporates the existing areas of greenspace and biodiversity.
- 4.11.3 Gladman ensures developments Green and Blue Infrastructure (GBI) networks are accessible to all and ensures they're multi-functional in promoting healthy and active lifestyles for new residents as well as existing residents in the local community.

4.12 Policy NE6: Flood Risk and the Water Environment

4.12.1 Gladman supports policy NE6 and its requirement for new development to appropriately manage flood risk and ensure it's not directed elsewhere. The site in Otterbourne will incorporate a sustainable urban drainage system with the inclusion of an attenuation pond in the northeastern corner of the site. The attenuation pond allows run off water to be stored in times of peak rainfall to reduce the risk of flooding.

4.12.2 The SuDs features incorporated into the site's design will create new habitats and enhance existing ones in turn further increasing the biodiversity net gain on the site.

4.13 Policy NE7: Settlement Gaps

4.13.1 Gladman understand the use of policy NE7 is to maintain the separate identities between communities. The settlement gap is used as a spatial planning tool to prevent development merging nearby settlements together and diluting the individual characters of the areas.

4.13.2 It is important for the plan to adhere to the sub-regional guidance and the Partnership for South Hampshire (PfSH) Framework. The PfSH states in its criteria for Councils designating settlement gaps in '**defining the extent of the gap, no more land than necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.**'

4.13.3 We therefore support the use of a settlement gap in the plan to the north of Otterbourne which separates the settlement from the South Downs development in Shawford. The gap is not excessive in scale and performs its purpose effectively.

4.14 Strategic Policy H1: Housing Provision

4.14.1 Strategic Policy H1 seeks to deliver a housing provision of around 15,115 dwellings between 2020-2040 through prioritising the approach of distributing development to a sustainable hierarchy of settlements.

4.14.2 Within southern Hampshire the draft plan acknowledges there are several authorities that appear to be unable to meet their housing requirement, the PfSH has published a Spatial Position Statement to address these shortfalls. The partnership is taking a two stage approach which involves Winchester exceeding their requirement.

- 4.14.3 Gladman support the use of an unmet needs allowance in aid of supporting its neighbouring authorities, and believe the plan is positively prepared. Nonetheless, the housing provision is based on the standard method from the adopted NPPF, and the emerging NPPF takes a stock-based approach to determine housing requirements. The proposed changes would increase the requirement to 1,099 dwellings per annum as opposed to the adopted requirement of 676 dwellings per annum.
- 4.14.4 Gladman understands the emerging NPPF is not currently at the point of adoption, however, suggest sites in Policy H2 phased supply be brought forward to ensure the Council continues to meet their housing land supply targets.
- 4.14.5 As the housing requirement is increased to reflect Winchester's neighbouring authorities, Gladman consider that the Council should identify and plan for additional housing supply (provision) above their housing need figure. At present the Council have identified enough housing provision to meet the housing need figure, however this is inclusive of an 1,895 dwelling contribution from windfall development.
- 4.14.6 Windfall sites by definition are unidentified and while the Council has provided some evidence justifying the proposed allowance, there is a potential that such sites may not come forward, particularly if market signals and circumstances present viability issues. In addition, given the scale of strategic development and brownfield sites within the emerging Local Plan there is potential for delivery issues to occur (these are discussed further in relation to Policy H2).

4.15 Strategic Policy H2: Housing Phasing and Supply

- 4.15.1 The above policy seeks to manage the delivery of residential sites to maintain a reasonable level of provision across the plan period and prevent all housing from being built out in the early years of the Local Plan.
- 4.15.2 Policy H2 seeks to prioritise the delivery of Previously Developed Land (PDL) and phases these sites towards the earlier parts of the plan period. The policy also places phasing restrictions on allocated greenfield sites to prevent their delivery until later in the plan period. These sites will not be permitted in advance unless they are needed to overcome a district-level housing land supply shortfall or specific local need.

- 4.15.3 The phasing policy presents an indicative phasing schedule to development sites being restricted to post April 2030. It is for this reason the policy H2 cannot be determined to represent a justified or effective strategy in line with the 'tests of soundness' in Paragraph 35 of the Framework. Gladman consider it is necessary for the Council to outline the number of homes that are anticipated to be delivered across the brownfield sites alongside the provision of a detailed site delivery trajectory which outlines the sites that will contribute to phases of delivery.
- 4.15.4 While brownfield sites and previously developed land are prioritised to phasing towards the earlier part of the plan period, brownfield sites often have a long delivery lead time as supported in paragraph 9.24. This appears to be a conflicting approach and Gladman consider that housing delivery on greenfield site allocations should be encouraged in the immediate to medium term to support housing provision across the period.
- 4.15.5 Indeed, the development of brownfield sites is complex and often subject to delay and deliverability issues due to unexpected physical constraints and contamination which requires significant remediation. There are proposed brownfield residential allocations which will be subject to significant demolition and clearance alongside major infrastructure requirements that are currently not phased to the latter part of the plan period, however are most likely to have a delayed building out period.
- 4.15.6 Furthermore, many of the proposed brownfield sites are not subject to any planning applications or are at the early stages meaning that they are unlikely to deliver homes until later in the plan period.
- 4.15.7 Gladman are in general support of the delivery of PDL and it is recognised that greenfield sites will be permitted ahead of their specified phasing where there is a district or locally identified level of housing supply shortfall. However, it is considered that the current phasing strategy may lead to an imbalance of housing provision over the plan period, with more housing delivered post-2030 than currently anticipated. The pressure for housing will be heightened post adoption of the emerging NPPF with the new increased housing requirement for WCC. Beyond a broad statement highlighting the prioritisation of PDL, there appears to be little justification of the proposed approach which conflicts with the

Government's objective to significantly boost the supply of housing and that land is developed without unnecessary delay³ .

4.15.8 An alternative mechanism should be utilised to support the delivery of PDL that does not seek to restrict available and deliverable greenfield sites that have been deemed suitable for residential development and allocation. Indeed, these sites can contribute immediately to the identified housing needs of the districts, rather than having to rely on sites that are likely to experience delay in delivery.

4.15.9 This phasing requirements highlighted in this policy will be further discussed in relation to Policy OT01: Land East of Main Road.

4.16 Strategic Policy H3: Spatial Housing Distribution

4.16.1 Gladman support the proposed spatial distribution of housing across the district which ensures the future sustainability and prosperity of all settlements in the hierarchy.

4.16.2 Otterbourne has been allocated 77 dwellings between 2020-2040, with 55 dwellings allocated to Policy OT01: Land east of main Road. Gladman welcome this allocation which reflects Otterbourne's sustainability and the context that the settlement was not directed development within the adopted Local Plan.

4.17 Strategic Policy H4: Development within Settlements

4.17.1 Strategic Policy H4 highlights defined settlements boundaries and how they are a key tool to indicate where built development is.

4.17.2 Gladman acknowledge the interactive policy map shows in the Regulation 19 the settlement boundary to have been extended around Otterbourne to include the new site allocation OT01- east of Main Road.

4.17.3 Additionally, within the Regulation 19 plan the settlement boundaries shown on page 478 on the map of Otterbourne includes the new site allocation OT01 to be within the proposed settlement boundary.

³ NPPF (2023) Paragraph 60

4.17.4 Gladman support the above policy as a result with the allocation of new housing now included within the settlement boundary and therefore consistent across policies in the wider plan.

4.18 Strategic Policy H5: Meeting Housing Needs

4.18.1 Gladman support 'dwelling size and tenure' provisions in Policy H5 which are supported by the SHMA document and the 2024 update.

4.18.2 Gladman welcome the flexibility in the wording of Policy H5 which includes on sites of 50 or more dwellings to allow a minimum of 6% self-build plots which have been unsuccessfully marketed for 12 months to be made available on the open market or built out and sold by the developer.

4.19 Policy OT01: Intermediate Rural Settlements Otterbourne

Land East of Main Road

4.19.1 Gladman welcome and support the proposed allocation of the Land East of Main Road for the delivery of 55 residential dwellings and associated open space in Policy OT01.

4.19.2 Land East of Main Road was assessed within the Strategic Housing and Economic Land Availability Assessment (SHELAA) produced in 2023, the site promoted under the SHELAA was referred to as OT03: Land off Main Road, Otterbourne.

4.19.3 OT03 was identified for having the capacity for 106 dwellings over the 6.4 ha site, alongside being available and capable of delivery within the next 5 years.

4.19.4 A number of constraints including protected trees and Countryside Policy MTR44 were identified, however two previous planning applications on the site have shown that these policy considerations and designations can be included and enhanced within a deliverable and viable scheme.

4.19.5 Gladman note the role that Otterbourne Parish Council have had in the selection of potential site allocations within their boundary. Gladman have previously worked proactively with the Parish Council to demonstrate that site could be brought forward in a manner which allows housing needs in the village to be met while also respecting the Parish Council's wishes to retain the eastern parcel of land within the site boundary as open space

for the benefit of the community. Gladman fully support the resulting potential allocation of the land and look forward to further engagement as the site is brought forward.

- 4.19.6 However, noting the potential increase in housing requirement in the near future within Winchester. Gladman suggest that the site is capable of accommodating in excess of the 55 dwellings proposed whilst retaining land beyond the PROW through the site and significant elements of open space. We are requesting a change to the plan in terms of increased flexibility in terms of the final masterplan for the development of the site.
- 4.19.7 Gladman highlight that the site is also available and achievable with a realistic prospect that the site could be delivered within five years from adoption of the Local Plan. However, the current policy wording sets a phasing restriction whereby permission for housing development will not be granted before 2030. As highlighted in response to Strategic Policy H2, Gladman do not consider that the current phasing strategy is effective or justified in line with Paragraph 35 of the NPPF and an alternative mechanism should be utilised to support the delivery of PDL that does not seek to restrict available and deliverable greenfield sites that have been deemed suitable for residential development and allocation.
- 4.19.8 The policy wording in paragraph 14.163 in the Regulation 19 plan has remained the same to paragraph 14.121 from the Regulation 18 draft plan. Gladman would request that the policy wording is amended to make explicit that any requirement for net biodiversity gain, either through policy NE1 or legislation, can be provided within the area offset for open space. This reflects the discussions which we have been held with the Parish Council for the eastern side of the site to be retained ensuring plentiful green space so that it is open and accessible to the public as the policy states.
- 4.19.9 As stated in the above response to policy H2, greenfield sites which can contribute immediately to the identified housing needs of an area should be supported and in turn this will support the Council in bringing forward PDL which is often subject to unexpected delays in delivery. The policy constraint phases the OT01 allocation to not be delivered until post 2030, Gladman believe this should be removed in order to provide flexibility and ensure WCC achieve a five-year housing land supply.
- 4.19.10 Appendix 1 of this submission provides further detail on the proposals for Land East of Main Road, Otterbourne and the commitment to deliver the site for residential development.

5 CONCLUSIONS

5.1 Summary

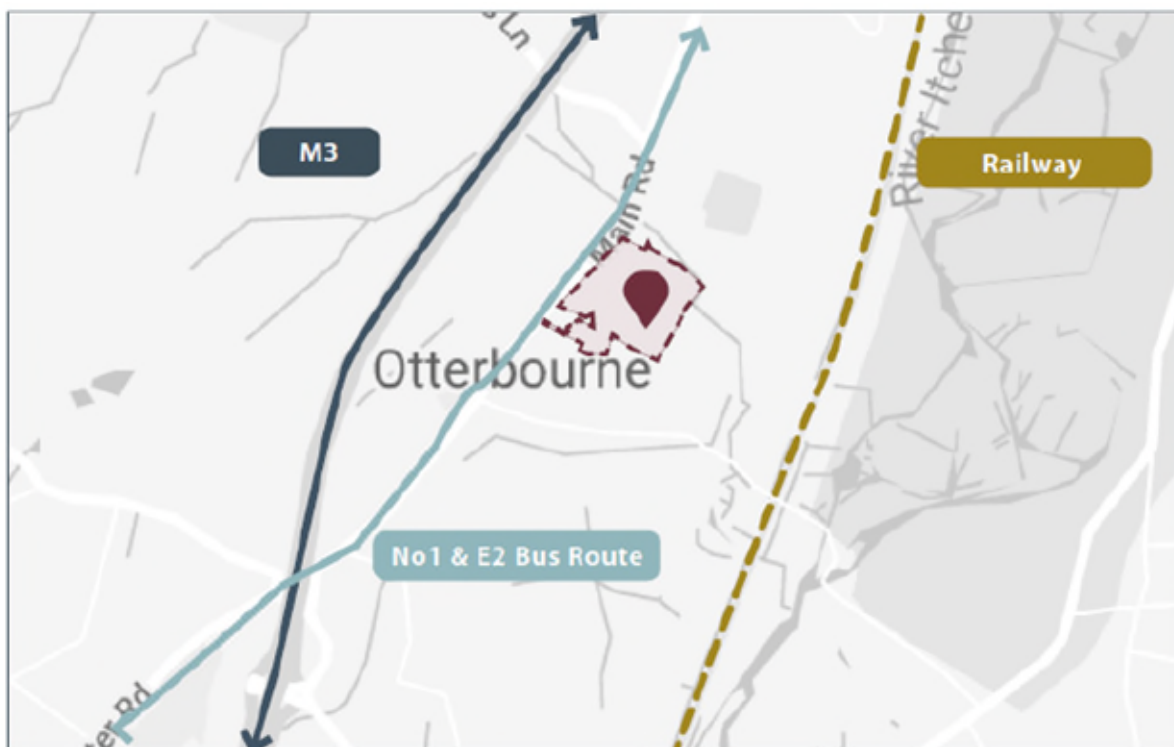
- 5.1.1 Gladman welcomes the opportunity to comment on the Winchester District Council's Regulation 19 Local Plan. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 5.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 5.1.3 It is considered that the current phasing schedule, whereby proposed greenfield site allocations are restricted from coming forward until later in the plan period, while complex brownfield sites that are likely to experience long lead in times are expected to be delivered early in the plan period, is unsound. It is likely that this phasing schedule will lead to an imbalance in delivery of housing, and it might prevent available and deliverable homes coming forward now to meet identified housing needs.

APPENDICES

Appendix 1: Land East of Main Road, Otterbourne Site Submission

The Settlement

Otterbourne lies approximately 4km to the north of the centre of Eastleigh and Chandler's Ford and 6.5km to the south of Winchester city centre. The Settlement is sustainably located to accommodate residential growth.



Transport Links

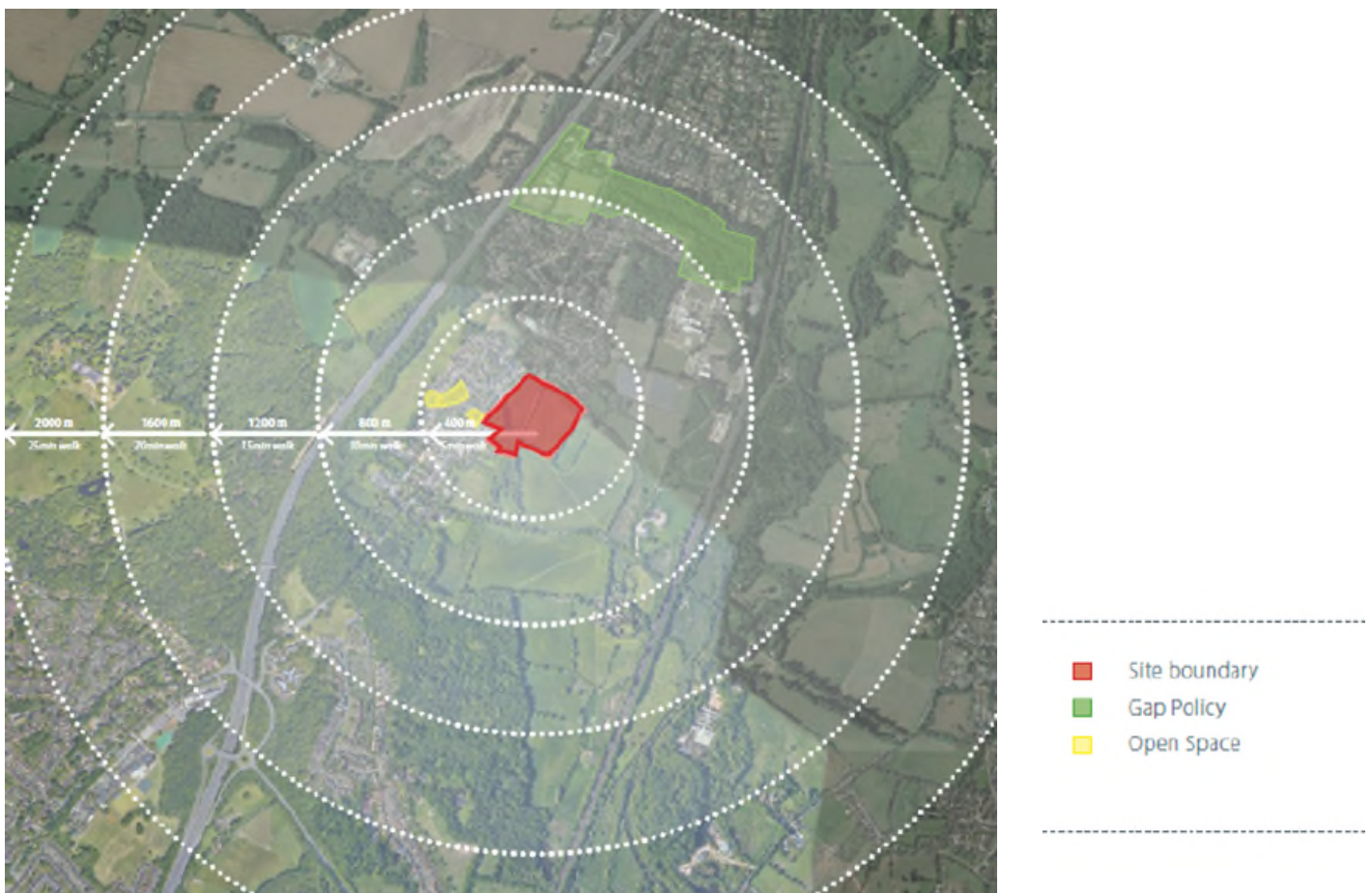
Benefitting from good public transport links to wider destinations by both bus and rail, alongside being closely located to Junction 12 of the M3 there is a genuine choice of transport modes available to future residents of a new housing development.

Main bus routes offer services to Winchester and Southampton every 15 minutes and the nearby Shawford Railway Station offers services to several easily accessible destinations including London via Winchester and Portsmouth.

A range of employment opportunities in a variety of sectors are accessible within a number of settlements in close proximity such as Winchester and Eastleigh. Further afield opportunities for employment include Portsmouth and Southampton both of which are commutable via public transport options.

The Site and its Surrounding Settlement

As shown in the image below with the restrictions of open space designation, gap policy and proximity of the M3 to the west of the settlement, growth will need to be east of Otterbourne. Otterbourne was not directed growth in the adopted plan. The site being promoted sits east of the settlement and subsequently supports a logical extension for growth of the sustainable settlement.



Access to Facilities from the site

As demonstrated in the below map, several services and facilities are located within a 10- minute walk to the site. Services further afield can be accessed using the public transport options available in Otterbourne



Key:

- | | | |
|---------------|----------------|-----------------|
| Site boundary | Football Club | Surgery |
| Gap Policy | Primary School | Railway Station |
| Open Space | School | Hospital |
| Pub | Shops | |

SHELAA 2023

The land at Main Road, Otterbourne has been assessed in the 2023 SHELAA under reference OT03.

The gross area of the SHELAA assessment site is identified as 6.4 hectares with a capacity of 106 dwellings at 30 dph due to its countryside location. It is acknowledged that the site is not owned by the promoter, however, have full consent of the landowners that the site is immediately available for development. As such, it is deemed the land is available within a five-year period.

The following constraints were identified in the SHELAA:

- TPO- The site has several protected trees which will remain on the site with sufficient root boundary protection from any new development proposal.
- Countryside (Policy MTRA₄)- Residential areas of the site are proposed to be removed from the countryside and sit within the settlement boundary of Otterbourne. Densities of the scheme will match the appropriate scale set out by existing development in the existing settlement.

There have been two previous outline applications submitted on the site one in 2016 and one in 2019. While both were previously refused the applications demonstrated the above policy consideration and protected designations can be included into a deliverable and viable development sensitive to its surroundings.

Indicative Framework Plan



Site Opportunities

The site offers the opportunity to provide:

- Around 55 residential dwellings (including a policy compliant level of affordable housing of 40%);
- Structural landscape planting and the retention and positive management of key landscape features;
- Significant areas of formal and informal open space including a large strategic open space which can be transferred to the Parish Council as part of the S106 for any future planning application;
- Improved connectivity to the existing Public Right of Way network;
- New access arrangements including an informal footpath/cycle link and highway improvements to Main Road; and a comprehensive surface water drainage scheme;
- A range of house sizes and tenures including 2-3 bedroom houses; and
- Potential opportunity to create a woodland walk within existing woodland area.



