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FAO: Planning Department at Winchester City Council

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RE: WINCHESTER PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) 2020-2040

Objection to Policy NE.7 Gap Policy of the Local Plan

On behalf of Hampshire Chamber of Commerce including its Planning & Transport Business Strategy Group, and Winchester & District Business Strategy Group at Hampshire Chamber of Commerce we would like to provide the following comments in regards to the Winchester Proposed Submission Local Plan (Regulation 19).

The comments have been agreed by Ross McNally in his capacity as Chief Executive/Executive Chair at Hampshire Chamber of Commerce. We believe that NE.7 Gap Policy should be deleted. The Chamber objected to Policy NE7 at the previous stage of the Local Plan (Reg. 18).

The deletion has become much more significant given the new government's stated objective of substantially increasing the provision of housing. The new figure for Winchester is an increase of 62% from 432 dwellings per annum to 676 dwellings per annum.

The government has provided a provisional arrangement to proceed with previous housing figures if the Local Plan has reached the Regulation 19 stage. The City Council has decided to take advantage of this concession, but it is essentially an interim position. Once the Local Plan Reg. 19 has been examined by an Inspector and approved the Council must commence a new Local Plan and the new housing and other government requirements must be addressed.

Proposed Reforms of the National Planning Policy Framework and Other Changes to the Planning System

The new government published a draft version of the NPPF seeking views on its content. It also published Consultation document that discussed the Proposed Reforms, and it sought responses to a wide range of issues.

The Chamber has identified a number of the Reforms which, in its opinion, justified the deletion of the Gap Policy NE7 now. These extracts are quoted below:-

The new Government campaigned on a mandate of reforming the planning system to enable the building of 1.5M new homes, to deliver the affordable homes we need, and to provide the employment space and infrastructure which is essential to boost our economy.

To achieve this the new government has made this mandatory. Its states:-

a. make the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options;

The new targets will mean councils must boost housebuilding in areas most in need, helping more people buy their own homes, removing the largest barriers to economic growth, and getting Britain building again.

The government has advised that local authorities must plan for the higher figure. The government is reinforcing the “presumption” in favour of sustainable development. The Chamber supports this presumption, but it regards the “failsafe” as particularly important.

f. improve the operation of ‘the presumption’ in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply, by clarifying the circumstances in which it applies; and, introducing new safeguards, to make clear that its application cannot justify poor quality development;

The Chamber recognises that there is a shortage of affordable homes.

h. make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need on all housing development and that the planning system supports a more diverse housebuilding sector;

The Chamber believes that communities must be involved in shaping development, but it doesn’t believe that this is compatible with the use of ‘intervention powers’ to achieve it. This will create strife.

f. ensure communities continue to shape housebuilding in their areas, demanding universal local plan coverage from all local planning authorities, while making full use of intervention powers to build the houses we need if this is not achieved;

The Chamber is especially supportive of the objective to increase the use of brownfield land to achieve all forms of development. This accords with the government objective below:-

5. We have been clear that brownfield land must be the first port of call. We want to make clear that the principle of development should not be in question on brownfield land, and so we are consulting on an amendment to paragraph 124c out of the current NPPF, reinforcing the expectation that development proposals on previously developed

land are viewed positively. This makes clear that the default answer to brownfield development should be yes.

The Chamber supports the government's objective of increasing the provision of small sites. It is considered that the criteria should be modified, and, in addition, the Council should make specific allocations for small sites based upon the modified criteria.

Making the small site allocation mandatory

15. Small and medium sized builders are essential to meeting our housing expectations and supporting local economies. They also build out the majority of small sites. Their business models often rely on identifying and securing small sites and building them out quickly. The Government is concerned that SME housebuilders are not able to access the small sites that they need, and that local planning authorities are not bringing forward small sites in their plans to the level set out in the NPPF.

The Chamber has set out its support for the development of small sites in a separate comment to the Local Plan.

GAP Policy CP18 now NE7 in the emerging Local Plan

Hampshire Chamber of Commerce objected to Policy NE7 at the previous stage of the Local Plan. There have been some significant developments recently and the Council agreed that a site in Whiteley Lane, Whiteley for two dwellings did not affect the function of the Gap (24/01343/OUT).

An Inspector's Decision with regards to a site in School Lane, Kingsworthy for one dwelling also did not affect the function of the Gap (APP/L1765/W/22/3310078). The same reasoning should have applied to a site in Lower Chase Road, Swanmore ((APP/L1765/W/17/3174240). This appeal was dismissed on grounds of conflict with the infilling criteria (6 dwellings) and conflict with the Swanmore to Bishops Waltham Gap.

Can you clarify why Gaps are retained in these situations, and what is the meaning of not affecting the function of the Gap? And what then is the purpose of the Gap?

The principal objective of the Gap Policies is to prevent development, but it applies to settlements that are the most sustainable and it mainly affects small sites, the large sites are often supported to meet the housing requirement.

It is concluded that Gap Policy NE7 is an unjustified extra hurdle for the development of small sites and the Policy should be deleted.

For these reasons, the Local Plan is regarded as "unsound".

Yours sincerely



Chief Executive/Executive Chair
Hampshire Chamber of Commerce