

Winchester District Local Plan 2020-2040
Planning Policy
Winchester City Council
City Offices
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Winchester
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11 October 2024

Dear Sir / Madam,

RE: Winchester District Local Plan 2020-2040: Regulation 19 Consultation

These representations are prepared by David Lock Associates, on behalf of Buckland Development Ltd ('Buckland'), in response to the *Winchester District Local Plan 2020-2040: Regulation 19 Consultation*, published by Winchester City Council (WCC).

Background

Buckland are the master developer for Welborne, a 6,000-home scheme located to the east of Knowle, which abuts the authority boundary of WCC. The development is in the early implementation stage, following the grant of planning permission P/17/0266/OA in September 2021 by Fareham Borough Council (FBC), and is anticipated that the first homes will be occupied in early 2025.

In tandem with the submission of the outline planning application, a full planning application (ref: 17/01607/FUL) was submitted to WCC. This application sought to provide enhanced public access to Dashwood, enabling the woodland to serve as Suitable Alternative Natural Greenspace (SANG) for Welborne. This application which was granted planning permission in April 2019 (subsequently amended under application 20/00882/FUL, approved in September 2020). Buckland are currently in the process of implementing this amended planning permission, ahead of the first occupations at Welborne.

Following the approval of the outline planning permission, a cross-boundary application was submitted to and approved by WCC and FBC (ref: 23/01722/FUL and P/23/1004/FP respectively). This application sought to underground electricity pylons which span the Welborne site, commencing at pylons located to the south of Dashwood.

It is in this context that this response to this Regulation 19 Consultation is made. This response thus focuses on the main policies which affect Welborne or its environs, and do not focus on general matters such as the development strategy within the plan, spatial growth options or other policies within the plan.

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Policy NE7: Settlement Gaps

Buckland consider Policy NE7: Settlement Gaps to comply with the Duty to Cooperate, be legally compliant, and to be sound. However, we do have some observations surrounding the supporting text of the policy, which would merit adjustment for clarificatory purposes.

The supporting text of Policy NE7: Settlement Gaps at 7.60 refers to the Partnership for South Hampshire (PfSH) guidance for designation of gaps (*Policy Framework for Gaps, PUSH*), which was published in December 2008. PfSH has subsequently published several documents which supersede the details provided in the *Policy Framework for Gaps*, the most recent of which is the *Spatial Position Statement 2023*, which did not use the 2008 report as part of its evidence base. Buckland acknowledges that the position statement is not an upper tier plan with which future local plans needs to conform, however, it is considered that the most up-to-date evidence should be used to support the plan.

The supporting text further states at 7.64 that *'following adoption of the Welborne Plan by Fareham Borough Council in 2015 the boundaries of the gap within Winchester are confirmed'*. It is our view that this wording is unclear. Whilst the Welborne Plan confirmed the boundaries of Welborne, it did not confirm the 'boundaries of the gap within Winchester' as this text suggests, as FBC could only plan for areas within its own jurisdiction. As such, it is Policy NE7 (and policy map) which confirms the boundary of this Gap, not the Welborne Plan. This wording should be reviewed in this context.

Policy WK3: Welborne Open Space

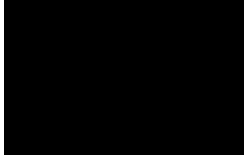
Buckland consider Policy WK3: Welborne Open Space to be legally compliant and complies with the Duty to Cooperate, however the Policy is not considered to be sound.


The name of the policy is unclear and imprecise, as the use of 'Open Space' would infer that the land functions in its entirety as space open to general public (including Welborne residents) for recreational uses. In reality however, only the SANG at Dashwood and the Meon Valley Trail is publicly accessible within this area, along with a limited number of Public Footpaths which span the area. The remainder of the land is within private ownership, and primarily used for agricultural purposes. Buckland therefore recommends that the policy be re-titled to more accurately and clearly define the purpose of the policy, for example the 'Knowle, Wickham and Welborne Settlement Gap'.

The supporting text of Policy WK3, states at 14.115 that *'it may be possible to accommodate some natural green infrastructure on land within Winchester district, provided it does not include buildings'*, however this reads as contradictory to other policies within the Local Plan (eg. Policy E10: Farm Diversification and Policy E11: Visitor-Related Development within the Countryside, which are designed to support the Rural Economy). Given the context set out above, with much of the land forming agricultural holdings, it is clear that some limited built development, where acceptable under other local plan policies, may be acceptable in this location. Further to this, there are some parcels of land within this area which, if developed, would not compromise the openness, integrity or role of this gap (and as such would meet the criteria set out in NE7 – Settlement Gaps). As such, this text should be removed.


We trust the above comments are helpful to inform your continued development of the Winchester District Local Plan 2020-2040. Buckland is grateful for the opportunity to set out its comments as above and would welcome ongoing dialogue with Winchester City Council, or contribute further to the local plan examination, if required.

Yours sincerely,




Senior Associate

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cc:  Buckland Development Ltd
Buckland Development Ltd
David Lock Associates