



# Winchester Proposed Submission Local Plan 2020 - 2040 (Regulation 19)



October 2024

Prepared by [REDACTED], BSc (Hons), MA Dip UD, MRTPI

Respondent Reference: TBC

**LUKEN**  **BECK**

Management | Development | Planning

## CONTENTS

1. Introduction	3
2. Response to Winchester Proposed Submission Local Plan (Regulation 19)	6
3. Conclusions	39

## APPENDICES

1. Land at Mill Chase - Site Accessibility Plan	44
2. Land at Mill Chase – Settlement Gap Analysis	45
3. Bishops Waltham, Sutton Scotney & South Wonston Key Facilities Assessment	47
4. Land at Mill Chase – Proposed Site Allocation Policy	48

## 1. INTRODUCTION

- 1.1 These representations are made in response to the Winchester Proposed Submission Local Plan 2020 – 2040 (Regulation 19) on behalf of Landacre Developments Limited. Our client has land interests in Land at Mill Chase, Winchester Road, Bishops Waltham (SHELAA site BW11). This site is fully within our client’s control and there are no legal issues to prevent this site coming forward in the next 5 years.
- 1.2 Notwithstanding our client’s land interests this statement has been prepared in recognition of the prevailing planning policy and guidance, in particular the National Planning Policy Framework, 20<sup>th</sup> December 2023 and the 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’*<sup>1</sup>.
- 1.3 These representations provide a response to the following policies of the Winchester Proposed Submission Local Plan (Regulation 19).
- **Policy H1 – Housing Provision**
  - **Policy H2 – Housing Phasing and Supply**
  - **Policy H3 – Spatial Housing Distribution**
  - **Policy H4 – Development within Settlements**
  - **Policy NE7 – Settlement Gaps**
  - **Policy BW4 – Land North of Rareridge Lane, Bishops Waltham**
  - **Policy SU01 – Land at Brightlands, Sutton Scotney**
  - **Policy SW01 – Land at West Hill Road North, South Wonston**

---

<sup>1</sup> Written Ministerial Statement 30.07.24

1.4 This statement highlights a need for amendments to the following policies:

- **Policy H1** to provide for a higher level of housing growth in the District to make a more significant contribution to unmet housing needs in the area which have not been provided for.
- **Policy H2** to include ‘Land at Mill Chase’, Bishops Waltham phased in the first half of the Plan period to ensure that the housing requirement is provided for, a 5-year housing land supply maintained and a greater contribution made to unmet housing needs.
- **Policy H3** to be amended to allocate ‘Land at Mill Chase’, Bishops Waltham for residential development consistent with the settlement hierarchy.
- **Policy H4** to be amended to include ‘Land at Mill Chase’ within the settlement boundary for Bishops Waltham.
- **Policy NE7** to be amended to exclude Land at Mill Chase, Bishops Waltham from the Bishops Waltham – Waltham Chase settlement gap.
- **Policy BW4** Land at Rareridge Lane, Bishops Waltham to be removed from the Plan or reduced in site capacity due to significant adverse impacts on the South Downs National Park.
- **Policy SUO1** Land at Brightlands, Sutton Scotney to be removed from the Plan or reduced in site capacity as the proposed allocation is inconsistent with the settlement hierarchy and deliverability is uncertain due to local constraints.
- **Policy SWO1** Land at West Hill Road North, South Wonston to be removed from the Plan or reduced in site capacity as the proposed allocation is inconsistent with the settlement hierarchy and deliverability is uncertain due to local constraints.

1.5 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 and other statements of national policy where relevant.*

## 2. RESPONSE TO WINCHESTER PROPOSED SUBMISSION LOCAL PLAN (2020 – 2040) (REGULATION 19)

### Policy H1 – Housing Provision

- 2.1 We object to Policy H1 which is not justified, effective or consistent with national policy. Policy H1 sets out the proposed distribution of the Plan housing requirement which includes the provision of about 3,825 dwellings in the Market Towns and the Rural Area. The proposed distribution of development is not in accordance with the settlement hierarchy and a higher level of growth should be directed to the Market Towns rather than less sustainable rural settlements such as Sutton Scotney and South Wonston. The Market Town of Bishops Waltham is a sustainable location with good site options capable of accommodating a higher proportion of growth than currently identified in the Local Plan.
- 2.2 The proposed allowance of 1,900 dwellings towards unmet housing need from neighbouring authorities is insufficient to address definitive unmet housing need in the area which currently stands at 25,113 dwellings and rises to at least 33,521 dwellings with the proposed revised standard method. The policy should be amended to identify additional green field sites to address this need in accordance with the settlement hierarchy including adjacent to the Market Town of Bishops Waltham.
- 2.3 Paragraph 11 of the NPPF sets out the Presumption in favour of sustainable development. For plan-making this means that:
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>, unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

2.4 Paragraph 20 of the NPPF states that, ‘strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) Housing (including affordable housing), employment, retail, leisure and other commercial development....’*

2.5 Paragraph 60 of the NPPF also states that, ‘to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community’.

2.6 The current standard method housing figure for Winchester City Council (March 2024) is 676 dpa<sup>2</sup> and over the Plan period to 2040 and the total local housing need (LHN) is 13,565 dwellings. In the Regulation 19 Plan the standard method has been calculated on an annual basis from 2020/21 to 2023/24 and then 676dpa has been applied for the remainder of the Plan period from 2024 – 2040. Overall, Policy H1 proposes to provide for about 15,115 dwellings (net) (excluding the South Downs National Park Area) over the Plan period to 2020 - 2040. The housing requirement

---

<sup>2</sup> Outcome of the standard method, March 2024, Ministry of Housing Communities and Local Government.

includes a contribution of 1,900 dwellings towards unmet housing need in the area but does not include a buffer for flexibility.

- 2.7 It is considered that the 1,900 allowance towards unmet housing need from neighbouring authorities is not justified as this does not contribute sufficiently towards addressing definitive unmet housing need from neighbouring authorities and within the Partnership for South Hampshire (PFSH) area. It also does not contribute sufficiently to the level of unmet housing need in the area that will arise from the revised NPPF and proposed changes to the standard method. It is considered that neighbouring authorities will not be able to contribute towards unmet housing needs due to challenges they face in providing for their own LHN based on the revised standard method.
- 2.8 The PFSH Spatial Position Statement (SPS)<sup>3</sup> does not set out an effective strategy for addressing current definitive unmet housing need in the area. The SPS (Table 1) includes an assessment of unmet housing need in the South Hampshire PFSH area. The SPS identifies an assessed need for 78,500 homes to 2036 and a housing supply shortfall of 11,771 dwellings. It is considered that this is a significant underestimate of current unmet housing need which will also rise significantly with proposed changes to the NPPF and revised standard method.
- 2.9 To address unmet housing need in the longer term, the SPS identifies Broad Areas of Search for Growth, as identified in Strategic Principle SP8. Collectively the Broad Areas of Search in the PFSH area are capable of delivering approximately 9,700 dwellings. The current Broad Areas of Search in the PFSH area are unlikely to be able to provide for unmet need and particularly in relation to the Government’s proposed changes to the NPPF and standard method.

---

<sup>3</sup> Partnership for South Hampshire Spatial Position Statement (December 2023)



- 2.10 A Broad Area of Search has been identified in Winchester District (East of Botley). The Winchester Local Plan is not proposing allocations within this area of search. Therefore, unmet housing need from neighbouring authorities will need to be accommodated in accordance with the settlement hierarchy including on sustainable sites adjoining the settlement boundaries of higher order settlements including the Market Town of Bishops Waltham.
- 2.11 The current position of neighbouring authorities in relation to Local Plan preparation and ability to provide for their LHN derived from the standard method is set out below. This demonstrates that there is a significant level of unmet housing need in the area that is unprovided for and in order to comply with the NPPF Duty to Co-operate and reduce the risk of being found ‘unsound’ the Winchester Local Plan is requested to make a greater contribution to address this unmet need.

#### Basingstoke and Deane Borough Council

- 2.12 Basingstoke and Deane consulted on a Regulation 18 Local Plan in early 2024 which proposes to deliver 851dpa which equates to 16,180 homes over the Plan period from 2021- 2040 which provides for LHN based on the current standard method. However, the Government’s proposed changes to the Standard Method would increase LHN from the 828 dpa to 1,137 dpa, which may result in unmet housing need in the Borough.

#### East Hampshire District Council

- 2.13 East Hampshire District Council consulted on a draft Local Plan (Regulation 18) in March 2024. The Local Plan identifies a housing requirement of 478dpa and 9,082 dwellings over the plan period (2021 – 2040). This takes a disaggregated approach to calculate OAN by excluding the part of the District within the National Park while also accommodating some unmet need from the National Park.

2.14 The Council currently plans to deliver LHN (standard method) based on a disaggregated approach. However, the Government’s proposed revised standard method would raise OAN to 1,074 dpa in the district and it is currently uncertain how this would be provided for. Therefore, there is a significant prospect that East Hampshire will have unmet housing need in relation to the revised standard method.

#### Eastleigh Borough Council

2.15 Eastleigh Borough Council is at an early stage in the review of their Local Plan and undertook a call for sites consultation in September 2023. The SPS identifies that Eastleigh is an authority that should be able to meet or exceed its standard method-based housing need. However, the Government’s proposed changes to the Standard Method would increase LHN from 645 dpa to 902 dpa and this may result in unmet housing need in the Borough.

#### Fareham Borough Council

2.16 Fareham’s Local Plan was recently adopted and provides about 900 dwellings more than its housing requirement, of which 800 dwellings are allocated to help meet Portsmouth City Council’s unmet need. An early review is planned but this has not yet commenced or established an updated housing need. The Government’s proposed changes to the Standard Method would increase LHN from the current 498 dpa to 794 dpa which may result in unmet housing need in the Borough.

#### Gosport Borough Council

2.17 Gosport Borough Council consulted on a Regulation 18 Local Plan in late 2021 and the current plan period is 2021 – 2038. The Council’s published local development scheme schedules a Regulation 19 consultation for October 2024. The emerging local plan proposes to deliver at total of 3,500 dwellings equating to 205 dpa. This is significantly below current Standard Method of 339 dpa which rises to 465 dpa with the

Government’s proposed changes to the NPPF. Therefore, there is a significant level of definitive unmet housing need from Gosport which has not been provided for in the local area.

#### Havant Borough Council

2.18 The Council consulted on a Regulation 18 Local Plan and Call for Sites in 2022 ‘Building a Better Future (2025 – 2040). At this stage standard method was identified at 516 dpa with an unmet housing need figure of 4,309 dwellings. The PfSH Spatial Position Statement confirms that Havant is unlikely to be able to meet its standard method-based housing need. Havant has undertaken updated housing capacity work as part of its Local Plan preparation, which has confirmed a substantial shortfall. Havant Borough Council has since written formally to Winchester City Council to request assistance in meeting an expected unmet need of 4,309 dwellings.

2.19 The Government’s proposed changes to the Standard Method would increase from 508 dpa to 874 dpa which will significantly increase unmet housing need in the Borough.

#### New Forest District Council

2.20 New Forest District Council are at an early stage in their preparation of their Local Plan. The Local Plan will need to provide for standard method in the revised NPPF, which is currently 1,465 dpa. In relation to constraints in the District it is anticipated that the Council will have significant unmet housing need that has not been provided for by adjoining authorities.

#### Portsmouth City Council

2.21 Portsmouth City Council has recently consulted on their Pre-Submission Local Plan (Regulation 19). The Submission Plan proposes a housing requirement of 680 dpa

which equates to 13,603 dwellings over the Plan period 2020 - 2040. The PfSH Spatial Position Statement confirms that Portsmouth is unlikely to be able to meet its standard method-based housing need. Portsmouth has produced a Housing and Economic Land Availability Assessment (HELAA) which indicates that it is likely to have a shortfall of 4,377 homes against its 2023 Standard Method need figure. A contribution of 800 homes has been made in the Fareham Local Plan which leaves a residual unmet need of 3,577 dwellings. The housing outstanding shortfall in the Portsmouth Local Plan is currently unprovided for.

- 2.22 The revised standard method figure for Portsmouth increases from 897dpa to 1,098dpa.

#### Southampton City Council

- 2.23 Southampton City Council is currently preparing a new local plan 'Southampton City Vision' and the consultation a Regulation 18 Plan has been undertaken. The SPS confirms that Southampton has a substantial shortfall as a result of the Government's 35% urban centres uplift. The NPPF confirms that the urban uplift 'should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place'. The agreed approach in the SPS is for Southampton City Council to accommodate its own needs.
- 2.24 The Regulation 18 Local Plan proposes to deliver a total of 16,800 dwellings over the plan period 2022 – 2040 which equates to 16,800 dwellings at 933dpa. This equates to an unmet housing need of 9,714 dwellings against the current standard method figure of 1473 dpa.
- 2.25 The Government's proposed changes to the standard method would result in a decrease in LHN from 1,473 dpa to 1,295 dpa. It is anticipated that this would still result in a substantial housing shortfall which will now need to be met by neighbouring



authorities since the revised NPPF abolishes the policy approach for the urban centres uplift.

### South Downs National Park

2.26 The Statement of Common Ground between Winchester City and the South Downs National Park Authority<sup>4</sup> identifies a housing requirement of 350 dwellings for the part of Winchester District falling within the South Downs National Park which should be provided for in the South Downs National Park Local Plan.

2.27 The Council has stated that the 1,900 dwellings unmet need allowance will contribute to any unmet need in the National Park should it arise. The SDNP are at an early stage in the preparation of their Local Plan but in relation to past housing delivery and landscape constraints it is anticipated that the National Park will have unmet housing need.

### Test Valley Borough Council

2.28 Test Valley Borough Council consulted on a draft Local Plan (Regulation 18) Stage 2 in the spring of 2024 proposes a housing requirement of 550 dpa and an overall requirement of 11,000 homes which can provide for LHN based on the current standard method. However, the Government's proposed changes to the standard method increase LHN to 921 dpa. It is understood that the Council will not be in a position to submit their Local Plan before the deadline in the revised NPPF and will need to provide for the new standard method figure. The Council is anticipated to shortly publish a revised LDS to reflect the updated timescale for preparing the local plan and responding to the new NPPF. It is anticipated that the Council will face significant challenges in providing for the new standard method figure which may result in unmet housing need in the Borough.

---

<sup>4</sup> Statement of Common Ground between Winchester City Council and the South Downs National Park Authority (August 2024)

### Summary of Current Unmet Housing Need

2.29 For the PFSH area the Spatial Position statement identifies a total unmet housing need of 11,771 dwellings. Our assessment of current definitive unmet need is set out in the table below.

**Table 1: Assessment of Unmet Housing Need**

Local Authority Area	Plan Period	Plan Making Stage	Standard Method figure Current / Proposed	Local Plan Proposed Housing Requirement	Current Standard Method Unmet Need	Revised Standard Method Unmet Need
Basingstoke and Deane Borough Council	2021 - 2040	Regulation 18	828 / 1,137	16,180	0	TBC
Eastleigh Borough Council	TBC	Initial call for sites	645 / 902	TBC	TBC	TBC
East Hampshire District Council	2021 - 2040	Regulation 18	575 / 1,074	9,082	0	TBC
Fareham Borough Council	TBC	Early Stage	498 / 794	TBC	TBC	TBC
Gosport Borough Council	2021 - 2038	Regulation 18	339 / 465	3,500 (205dpa)	2,263	4,405
Havant Borough Council	2025 - 2040	Regulation 18	508 / 874	TBC	4,309	9,799
New Forest District Council	TBC	Early Stage	729 / 1,465	TBC	TBC	TBC
Portsmouth Borough Council	2020 - 2040	Regulation 19	897 / 1,098	13,603 (680dpa)	3,577	7,557
Southampton City Council	2022 - 2040	Regulation 18	1,473 / 1,295	16,800	9,714	6,510

<b>South Downs National Park</b>	TBC (15 Years Minimum)	Early Stage	350 dpa (within WCC District)	TBC	5,250	5,250
<b>Test Valley Borough Council</b>	2020 - 2040	Regulation 18 (Stage 2)	550 / 921	11,000	0	TBC
<b>Totals</b>					<b>25,113</b>	<b>33,521</b>

### Conclusions on Unmet Need

- 2.30 There is currently definitive 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. Unmet housing need for these authorities currently totals 25,111 dwellings which rises to 33,521 dwellings with the proposed revised standard method.
- 2.31 Following the proposed revised NPPF and changes to the standard method there is significant potential for unmet housing need to arise from Basingstoke and Deane Borough Council, East Hants District Council, New Forest District Council, Test Valley Borough Council, Eastleigh and Fareham.
- 2.32 The Proposed Submission Draft Local Plan identifies a supply of 1,900 homes to contribute to unmet need. However, there is no effective strategy in place with neighbouring authorities to provide for the definitive unmet need from Havant, Portsmouth, Southampton and Gosport Councils or anticipated unmet need from other adjoining and PFSH authorities. The Winchester Local Plan and Policy H1 should be amended to provide a higher level of housing to help address unmet housing need. This can be delivered in accordance with the settlement hierarchy including within sustainable settlements such as the Market Town of Bishops Waltham.

### Housing Supply Buffer

- 2.33 It is standard practice in the preparation of Local Plans in the area to provide a 10% buffer over and above LHN to provide flexibility in supply to ensure that housing needs are met during the Plan period. This takes account of factors such as changes in timescales for the delivery of strategic site allocations. The Plan does not propose to apply a buffer as the Council consider that there is sufficient certainty on housing



delivery with 64% of the District requirement met by dwellings that have either been completed or have planning consent and 25% of the housing supply is from new allocations. It is considered that the Council's approach is not justified or effective and an appropriate buffer should be applied to take account of non-implementation of planning permissions and potential change in timeframes for the delivery of strategic sites.

## **Policy H2 – Housing Phasing and Supply**

- 2.34 We object to Policy H2 and the proposed phasing of green field allocation sites as it is not justified or effective. The draft policy may result in the housing requirement not being provided for during the Plan period and affect the ability to maintain a 5-year land supply. Furthermore, it does not identify sufficient sites to address unmet housing need or include the most sustainable sites that are suitable, available, achievable and consistent with the settlement hierarchy.
- 2.35 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.
- 2.36 The Local Plan states that the justification 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 green field sites which can be delivered without delay in the first 5 years of the Plan period.
- 2.37 The revised NPPF also proposes changes to the standard method which will significantly increase the level of unmet housing need in the area. The Winchester

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 NPPF and standard method.

- 2.38 There is definitive 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.
- 2.39 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, Test Valley Borough Council, Eastleigh Borough Council and Fareham Borough Council.
- 2.40 Therefore, there is a need for the local plan to bring forward sufficient green field allocations in the first 5 years to provide for Winchester District LHN, maintain a 5-year land supply and better address unmet housing needs of neighbouring authorities.

#### Nutrient Neutrality and Deliverability of Allocations

- 2.41 There is also a need to include sufficient greenfield sites in the Plan that are deliverable in the first 5 years of the Plan period and not constrained by the need for nutrient neutrality phosphorus mitigation requirements. The following table sets out the river catchment areas and mitigation requirements for the greenfield allocations currently set out in Policy H2 in relation to nitrogen and phosphates (as identified in the Regulation 19 HRA report<sup>5</sup>):

---

<sup>5</sup> Winchester Local Plan Regulation 19 Habitats Regulations Report (July 2024)

**Table 2: Policy H2 Housing Allocations – Nutrient Mitigation Requirements**

Local Plan Allocation	River Catchment	Mitigation Requirements	Nutrients Budget (HRA source) (Kg/TN/Yr / Kg/TP/Yr) + 20% buffer	
			Nitrogen	Phosphorus
W4 – Courtenay Road, Winchester (150 dwellings)	River Itchen	Nitrogen and Phosphates	57.45	15.45
BW4 – North of Rareridge Lane, Bishops Waltham (100 dwellings)	East Hampshire	Nitrogen	173.30	0
NA3 – Alresford Neighbourhood Plan, New Alresford (100 dwellings)	River Itchen	Nitrogen and Phosphates	90.87	65.94
CC2 – Colden Common Farm, Colden Common (45 dwellings)	River Itchen	Nitrogen and Phosphates	58.09	4.10
CC3 – Land at Main Road, Colden Common (35 dwellings)	River Itchen	Nitrogen and Phosphates	22.7	2.22
CC4 – Land adj 85 Church Lane, Colden Common (10 dwellings)	River Itchen	Nitrogen and Phosphates	16.99	1.32
DEN1 – Denmead Neighbourhood Plan, Denmead (100 dwellings)	East Hampshire	Nitrogen	87.48	0
WK5 – Mill Lane, Wickham (40)	East Hampshire	Nitrogen	45.45	0

dwelling)				
WK6 – Southwick Road / School Road, Wickham (60 dwellings)	East Hampshire	Nitrogen	45.45	0
OT01 – Land East of Main Road, Otterbourne (55 dwellings)	River Itchen	Nitrogen and Phosphates	0	10.32
SW01 – Land at West Hill Road North, South Wonston (40 dwellings)	River Itchen	Nitrogen and Phosphates	41.26	4.62
SU01 – Brightlands, Sutton Scotney (60 dwellings)	River Test	Nitrogen	189.35	0

2.42 Of these green field allocations, 7 sites are within the River Itchen catchment with a combined residential capacity for about 435 dwellings. These sites are required in accordance with Local Plan Policy NE16 of the Submission Plan to achieve nutrient neutrality in relation to nitrogen and phosphates.

2.43 A nutrient neutrality topic paper<sup>6</sup> has been prepared by the Council and published alongside the Proposed Submission Draft Local Plan to set out the Plan strategy for achieving nutrient neutrality. In relation to phosphates the topic paper identifies a programme for the upgrading of Council owned waste-water treatment works (WWTW's) to package treatment works to generate a reduction in phosphorus. The Council have completed the upgrades for the first two waste-water treatment works to provide phosphorus mitigation in the short term. The initial improvements generated 10.55Kgs/TP/Yr this is enough to unlock the current backlog of planning applications and meet the nutrient mitigation demand for the Local Plan allocations

<sup>6</sup> Winchester District Local Plan 2040 Nutrient Neutrality Topic Paper (July 2040)



in the first year of the Plan period. The Council has an ongoing programme of improvements to council owned waste-water treatment works which is anticipated will generate further nitrogen and phosphates credits. However, there remains an outstanding phosphorus load for the 7 sites identified where further mitigation is required and this may delay the delivery of some of these sites until significantly later in the Plan period (Beyond 2030). This will affect housing supply, the ability to maintain a 5-year housing land supply and potentially the delivery of the housing requirement within the Plan period.

- 2.44 In conclusion there is a need to ensure that the Plan housing requirement is met through a greater contribution towards unmet housing needs in the area. This will require the identification of additional greenfield sites in accordance with the settlement hierarchy which do not require mitigation for phosphorus in relation to the River Itchen. This should include sites adjoining the most sustainable settlements including Bishops Waltham. Land at Mill Chase is relatively unconstrained, sustainably located in Bishops Waltham and capable of delivering about 50 homes in the first 5 years of the Plan period. The site is deliverable and does not require mitigation for phosphorus. The site should be allocated in the local plan and included within Policy H2 (phased in the first half of the plan period) to provide flexibility in housing land supply.

### **Policy H3 – Spatial Housing Distribution**

- 2.45 We object to Policy H3 which is not justified or consistent with the Local Plan settlement hierarchy. Policy H3 ‘Spatial Housing Distribution’ sets out the proposed overall distribution of the Policy H1 housing requirement for the Plan period (2020 – 2040). The policy currently directs a disproportionate level of growth to lower order and less sustainable rural settlements including lower intermediate rural settlements. This includes the proposed allocations in Sutton Scotney (SUO1 Land at Brightlands, 50 – 60 dwellings) and South Wonston (SWO1 Land at West Hill Road

North, 40 dwellings). A higher proportion of growth should be directed to the most sustainable settlements in the hierarchy including within the Market Town of Bishops Waltham. It is sustainable to deliver a higher level of growth in this location in relation to available services, facilities, local constraints and suitable, available and achievable site options.

2.46 Land at Mill Chase provides an opportunity to deliver about 50 dwellings on land adjoining the settlement boundary of Bishops Waltham. Allocation of this site in the Plan is consistent with the settlement hierarchy and is a more sustainable approach than directing growth to constrained intermediate rural settlements that lack the key facilities to support growth.

2.47 An assessment of the suitability, availability and achievability of Land at Mill Chase, Bishops Waltham is set out below which provides justification to allocate the site in the Local Plan and include in Policy H3. Further details are provided in the submitted Vision Statement.

#### Land at Mill Chase

##### Site Location and Local Amenities

2.48 The site (c. 3.4ha) is located approximately 650m south of Bishops Waltham Town Centre and is immediately adjacent to the settlement boundary. There are a number of bus stops within comfortable walking distance including main bus routes from the centre of Bishops Waltham within a 10 minute walk. Also, within a 10-minute walk (800m) from the site access are multiple amenities such as schools, places of worship, medical care, and community centres. Supermarkets including Hylands, Co-op, and Sainsbury's Local, as stated in the Vision Statement.

### Flood Risk and Drainage

- 2.49 The site is located in flood zone 1 and is at the lowest risk of flooding. The development will include a sustainable drainage solution (SuDs) combining surface water attenuation with biodiversity enhancement.

### Highways and Access

- 2.50 A transport assessment was undertaken for the site by Pell Frischmann in November 2023 to assess the sustainability of the site in relation to accessibility to local services / facilities and to assess site access arrangements.
- 2.51 The site is connected to Bishops Waltham town centre by the Winchester Road (B2177). The site is also well connected to the town centre by walking and cycling routes including via existing footways. The site is also well served by public transport with bus stops located on the northern site boundary providing connections to Hedge End, Winchester, Fareham and Eastleigh. Site access is deliverable via a new junction off the Winchester Road.
- 2.52 Appendix A sets out an accessibility plan which compares accessibility to the town centre and other key facilities from Land at Mill Chase, existing allocations and currently proposed site allocations. This demonstrates that the site is sustainably located and within walking and cycling distance of the town centre and key facilities.

### Heritage

- 2.53 A Heritage Statement has been prepared in January 2024 to inform the site master plan. Development of the site will not result in significant harm to heritage assets including the Bishops Waltham Conservation Area and nearby listed buildings. The Bishops Waltham Conservation Area and Scheduled Bishops Palace are located some distance to the north-west of the site and the proposed development will not result

in harm to their setting. The provision of a landscape and heritage buffer adjacent to the site prevents harm to the setting of nearby listed buildings, as stated in the Vision Statement.

### Biodiversity

- 2.54 A habitat survey and Biodiversity Net Gain Assessment was undertaken for the site in November 2023. The site consists of a roughly diamond-shaped field formed of paddocks with trees and scrub. The site is not part of any strategic wildlife corridor or ecological designation. The Moors Site of Special Scientific Interest (SSSI) and Local Nature Reserve are located to the east of the site, beyond Winchester Road.
- 2.55 The proposal includes the enhancement of grassland woodland, scrub and hedgerows and 10% BNG can be achieved in accordance with local policy requirements, as detailed in the Vision Statement.

### Landscape Impact

- 2.56 The Site is not covered by any statutory landscape designation. The South Downs National Park (SDNP) encompasses the landscape to the north and east of Bishop's Waltham, extending to the northern side of the B2177 Winchester Road. The site is well screened by an existing mature tree belt along the Winchester Road which limits the intervisibility between the site and the National Park and provides a robust separation between the SDNP and the site.

### Settlement Gap

- 2.57 The Local Plan defines settlement gaps in the district which includes the Bishops Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap. The site is located adjacent to the southern settlement boundary and the northern edge of the Bishops Waltham and Waltham Chase settlement gap.

2.58 Local Plan Policy NE7 defines the criteria for the selection of locations for the designation of gaps which include:

- The open nature/sense of separation between settlements cannot be retained by other policy designations;
- The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;
- In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.

2.59 Policy NE7 sets out that within local gaps development will be permitted that does not undermine the function of the gap and its intended role to define and retain the separate identify of settlements. The policy goes on to state that any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.

2.60 A Settlement Gap Review has been undertaken by LUC on behalf of the Council in July 2024<sup>7</sup> to inform preparation of the Local Plan. The study concludes that the gap between Bishops Waltham and Waltham Chase is relatively strong, with gap size and the presence of significant woodland or tree cover contributing to gap separation.

2.61 The Gap Study states that the following features are important in retaining a sense of separation between Bishop’s Waltham and Waltham Chase:

- The tree cover along the River Hamble linking through to The Moors SSSI, forming a southern limit to expansion of Bishop’s Waltham, and undeveloped valley landform around it.
- The integrity of the Park Lug as a boundary to south-western expansion of Bishop’s Waltham.
- Maintenance of a gap between linear development along the B2177 and the edge of Waltham Chase.

---

<sup>7</sup> Settlement Gap Review, Winchester City Council, LUC, July 2024.

- The small-scale field pattern with well-treed boundaries.

2.62 The site is located on the northern edge of the settlement gap and maintains the integrity and current strength of the Bishops Waltham and Waltham Chase settlement gap. In accordance with Policy NE7 development of the site will retain the separate identity of Bishops Waltham and Waltham Chase, avoid coalescence and maintain the generally open and undeveloped nature of the gap.

2.63 Development of the site will also maintain the key gap features as identified in the LUC settlement Gap Study. The site is located to the north of the River Hamble and does not impact on the tree cover along the river corridor. The site does not impact upon the integrity of Park Lug on the south-western edge of Bishops Waltham. Development of the site will also maintain a gap between linear development along the B2177 and the edge of Waltham Chase.

2.64 Furthermore, there are existing urban influences on the settlement edge where the site is located, and the proposed development will not have an adverse impact on the local character. In conclusion, the site does not result in significant harm to landscape character and maintains the integrity of the local gap. Appendix B includes a plan to accompany this response and to illustrate the limited impact on the Bishops Waltham – Waltham Chase settlement gap.

#### Arboriculture

2.65 An arboricultural constraints assessment was undertaken in October 2023 to inform the preliminary layout, taking proper account of tree constraints. The proposed development will retain significant trees to minimise impacts on biodiversity and to protect the landscape character screening views into and out of the site.



## Conclusions

- 2.66 The proposed distribution of development in Policy H3 is not justified and the proportion of growth directed to lower order settlements (including Sutton Scotney and South Wonston) is not consistent with the settlement hierarchy and in view of suitable, available and achievable site options in Bishops Waltham.
- 2.67 Bishops Waltham is identified as a Market Town in the local plan settlement hierarchy and a focus for growth in the district outside of Winchester City and the South Hampshire Urban Areas. Growth should be primarily directed to the higher order settlements in the settlement hierarchy.
- 2.68 Land at Mill Chase provides the opportunity to deliver c50 dwellings in the Market Town of Bishops Waltham. The site is of modest scale in this sustainable location would be deliverable in terms of suitability, availability and ‘achievability’.
- 2.69 The site is well connected by public transport services to Winchester, the rest of Hampshire and within comfortable walking distance of a range of key services and local facilities that would help support a sustainable community.
- 2.70 The site does not have a significant impact on landscape character and is not located within or adversely affect ecological sites of international, national or local ecological importance. The site will maintain the integrity of the Bishops Waltham and Waltham Chase settlement gap.
- 2.71 Therefore, in accordance with the settlement hierarchy, Local Plan evidence and local constraints, land at Mill Chase should be allocated in the local plan and included within Policy H3 Spatial Housing Distribution. It can also be delivered within the next 5 years and provides a valuable contribution towards the local plan housing requirement and current shortfall in relation to unmet housing need in the area. A proposed allocation policy for the site is set out in Appendix 4.

## **Policy H4 – Development within Settlements**

- 2.72 We object to Policy H4 which is not justified as the proposed settlement boundary for Bishops Waltham does not include Land at Mill Chase which is a sustainable site for allocation in the local plan and inclusion within the settlement boundary. Our response to Policy H3 sets out the full justification for allocating the site in the local plan and inclusion within the Bishops Waltham settlement boundary.
- 2.73 In summary, Land at Mill Chase provides the opportunity to deliver c50 dwellings in the Market Town of Bishops Waltham. The site is of modest scale and is deliverable in terms of suitability, availability and ‘achievability’.
- 2.74 The site is accessibility to local services / facilities and public transport providing connections to Winchester and the rest of Hampshire. The site relates positively to the settlement edge and is relatively unconstrained in relation to landscape, settlement gap, heritage, ecology and BNG, flood risk and transport impacts.
- 2.75 The site can be delivered within 5 years and will make a significant contribution to the local plan housing requirement and provide a greater contribution towards definitive unmet housing need in the area which is currently not provided for.

## **Policy NE7 Settlement Gaps**

- 2.76 Through the preparation of the Local Plan, a review has been undertaken of the District settlement gaps as set out in the Settlement Gap Review 8. We object to the extent of the Bishop’s Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap as defined by Policy NE7.

---

<sup>8</sup> Settlement Gap Review, Land Use Consultants, (2024).

- 2.77 The proposed gap is not justified or consistent with national policy and should exclude Land at Mill Chase (SHELAA, BW11). Our response to Policy H3 sets out the justification for the allocation of the site and exclusion from the settlement gap. Appendix 2 of these representations also demonstrates that allocation of the site will not affect the integrity of the local gap and complies with the NPPF and Policy NE7.
- 2.78 Policy NE7 defines a number of local gaps in the district which comprise generally undeveloped and open land which help to define and retain the separate identify of settlements. Settlement gaps have been established within the district in accordance with the Partnership for South Hampshire (PFSH) criteria for designation ‘Policy Framework for Gaps’ (December 2008).
- 2.79 The NPPF states that local plans will identify the location of gaps and include policies to set out the types of development which will be permitted, based on the following principles:
- It would not diminish the physical and/or visual separation of settlements; and
  - It would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.
- 2.80 The Local Plan and Policy NE7 defines a number of settlement gaps which includes the Bishop’s Waltham – Swanmore – Waltham Chase – Shedfield – Shirrell Heath gap.
- 2.81 The exclusion of Land at Mill Chase from the local gap is consistent with the NPPF and Policy NE7 in not undermining the function of the gap and its intended role and retaining the separate identify of Bishops Waltham and Waltham Chase. The exclusion of the site from the gap will also maintain the generally open and undeveloped nature of the gap as a whole and avoid coalescence.

## **Policy BW4 – Land North of Rareridge Lane, Bishops Waltham**

2.82 We object to the proposed allocation of this site which is not justified or consistent with national policy. The Council’s justification for the site allocation is set out in the Development Strategy and Site Selection Topic Paper<sup>9</sup>. In their site assessment the Council conclude that impact on the South Downs National Park can be mitigated through design and layout (including restricting development to the south of the site). However, the South Downs National Park Authority (SDNPA) have objected to the site in the Regulation 18 draft Local Plan due to impact on the National Park. Their concerns (as detailed below) have not been overcome (as confirmed in the latest Statement of Common Ground (SOCG)<sup>10</sup>. Furthermore, the Regulation 19 SA site assessment is not justified or legally compliant as the site assessment for BW17 fails to identify the landscape impact on the SDNP.

2.83 It has also been established through our Feasibility Biodiversity Net Gain Assessment<sup>11</sup> that 10% Biodiversity Net Gain (BNG) is not achievable on the Rareridge Lane site, and it is not clear how this will be delivered. Therefore, in relation to BNG the site is not consistent with the NPPF or draft Local Plan Policy NE5.

### National Landscape Impact - South Downs National Park

2.84 We object to the allocation of ‘Land North of Rareridge Lane’ in relation to the significant adverse impact on the South Downs National Park (National Landscape). The SDNP have formally objected to the allocation of the site, and we support this objection.

2.85 The SDNP boundary follows the northern edge of the Bishop’s Waltham settlement boundary. The site is adjacent to, and within the setting of, the SDNP.

---

<sup>9</sup> Development Strategy and Site Selection (July 2024)

<sup>10</sup> Statement of Common Ground between Winchester City Council and the South Downs National Park Authority (August 2024)

<sup>11</sup> As set out in the ‘Mill Chase New Neighbourhood Vision Statement (January 2024).

2.86 The site comprises a young mature woodland (75%) and regenerating scrub/woodland (25%). The site and its surroundings have a strong rural character with existing Public Right of Way (PRoW) and various permissive paths on raised land to the north.

2.87 In their objections the SDNPA have identified the following impacts of the proposed allocation:

- a) Development would create an uncharacteristic, fragmentary, settlement extension, and development on this site has potential to be visually intrusive;
- b) Development would adversely affect the tranquillity of the area; and
- c) Development would adversely affect the recreational enjoyment of the PRoW to the north. It is, therefore, considered that development would be harmful to the setting of the SDNP.

2.88 At the Regulation 18 stage the SDNPA formally objected to the proposed allocation and concluded it would adversely affect the setting of the National Park and would be visually disruptive to the existing settlement pattern. The SDNPA also concluded that 100 dwellings would not be achievable on the site without adversely impacting the National Park.

2.89 A Statement of Common Ground between Winchester City Council and the SDNPA which addresses Rareridge Lane was signed in August 2024. The agreed position concludes that the SDNPA still has an ‘in principle’ concern about the allocation of the site in relation to the proposed development quantum and how this could be successfully achieved through a landscape led design.

#### BW17 Land North of Rareridge Lane Reg 19 Sustainability Appraisal

2.90 An Integrated Impact Assessment Report<sup>12</sup> incorporating SA has been undertaken for the Regulation 19 Local Plan including site assessments. The appraisal for site BW17

---

<sup>12</sup> Winchester District Proposed Submission Local Plan (Regulation 19) Integrated Impact Assessment Report (LUC, July 2024).

is not justified or legally compliant as it fails to identify the landscape impacts on the National Park. The appraisal of the site under objective IIA10: Landscape identifies only a ‘minor-negative concern’ and concludes that the site has ‘medium or higher overall landscape sensitivity’.

#### Land at Mill Chase Comparative Landscape Impact

- 2.91 In terms of site selection and landscape impact, ‘Land at Mill Chase’ is a preferential ‘Land at Rareridge Lane’. Land at Mill Chase is located adjacent to the south-east settlement edge of Bishops Waltham where views into and out of the site are screened by woodland and existing residential development. The Land at Mill Chase Vision Statement should be referred to in respect of landscape impact.

#### Landscape Conclusions

- 2.92 NPPF paragraph 182 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. Paragraph 182 also states that development in the setting of National Parks should be sensitively located and designed to avoid or minimise adverse impacts on designated areas. The SDNPA have confirmed through their representations and latest SOCG that the proposed allocation of 100 homes will have a significant adverse impact on the National Park and these effects cannot be adequately mitigated through a landscape led approach. Therefore, the proposed allocation is contrary to national policy and should be removed from the draft Local Plan or the capacity for development reduced to ensure landscape impacts on the setting of the National Park are appropriately addressed.



### Biodiversity Net Gain (BNG)

2.93 The proposed allocation at Rareridge Lane is not consistent with national policy and will be unable to deliver a 10% net gain in BNG. The proposed development would result in the loss of a portion of the grassland, woodland and scrub. A Feasibility Biodiversity Net Gain Assessment has been undertaken for Land at Mill Chase and Land North of Rareridge Lane as part of a comparative assessment set out in the Mill Chase New Neighbourhood Vision Statement. This assessment demonstrates that a development of 100 dwellings would not be able to deliver a 10% net gain in BNG. To achieve 10% BNG on the Rareridge Lane site the development potential would need to be reduced from 100 to approximately 50 dwellings.

### **Policy SU01 – Land at Brightlands, Sutton Scotney**

2.94 We object to the proposed allocation of ‘Land at Brightlands, Sutton Scotney’ for 50 – 60 dwellings, which is not justified or effective. The proposed allocation is not consistent with the settlement hierarchy in view of reasonable alternative site options in higher order settlements such as Bishops Waltham. There is also significant uncertainty regarding the deliverability of the site in relation to constraints including waste-water infrastructure.

2.95 Sutton Scotney is defined in the Local Plan settlement hierarchy as an ‘intermediate rural settlement’ which sits below the more sustainable ‘Market Towns’ and ‘Larger Rural Settlements’ in the Policy H3 Settlement Hierarchy. Consistent with national policy and the settlement hierarchy, it is more sustainable to direct a higher level of growth (than currently identified in the Local Plan) to Market Towns including Bishops Waltham.

- 2.96 A Settlement Hierarchy assessment<sup>13</sup> has been undertaken by the Council which provides an up-to-date assessment of settlements in the District to determine their place in the settlement hierarchy and to inform the Local Plan spatial strategy. Bishops Waltham scores highly in the Council’s assessment of daily facilities and services with only the settlement of Winchester City scoring higher. A comparative assessment of key services and facilities between Bishops Waltham, Sutton Scotney and South Wonston is set out in Appendix 3.
- 2.97 Sutton Scotney is not a sustainable location to accommodate significant population growth and lacks an appropriate range of key facilities. The settlement lacks a regular public transport service, primary school, appropriate range of health facilities and retail facilities to meet day to day needs.
- 2.98 Bishops Waltham is a sustainable Market Town appropriate to accommodate a higher level of growth than currently identified in the Local Plan. The settlement has a regular public transport service, Post Office, full range of healthcare facilities, a range of convenience and other retail, pre-school and primary school, excellent community facilities and a range of employment opportunities.

#### Land at Brightlands - Site Constraints

- 2.99 Sutton Scotney has significant constraints in the capacity of the local waste-water network which has resulted in daily tankering to dispose of wastewater. In response to the Regulation 18 consultation the Parish Council and Ward Members have expressed their strong concern regarding an allocation in Sutton Scotney due to sewerage capacity issues.
- 2.100 It is understood that Southern Water have commenced the construction of a new pipeline between Sutton Scotney and South Wonston which would link to the Harestock Road Waste-Water Treatment Plant in Littleton. However, it is uncertain

---

<sup>13</sup> Settlement Hierarchy Background Paper, WCC, August 2024.

whether the pipeline will provide sufficient capacity to accommodate the proposed allocation. Furthermore, there is uncertainty regarding the delivery of further infrastructure waste-water infrastructure improvements that are required in South Wonston to support the development.

2.101 The Regulation 19 SA identifies that the site is within an area of high archaeological potential, and it is likely that archaeological remains will be encountered. Records also show that a Roman building of some status was reported at or near this location. Therefore, the site may not be deliverable in relation to archaeological sensitivity.

2.102 In relation to noise the majority of the site is within an area where noise levels at night from roads and railways are above 50 dB or the noise levels as recorded for the 16-hour period between 0700 – 2300 are above 55 dB. Therefore, it is uncertain if the site is entirely deliverable when appropriate noise buffers are applied.

2.103 Therefore, in relation to site constraints regarding wastewater infrastructure, noise and archaeology there is a lack of clear evidence that the site is deliverable, and it should be removed from the draft Local Plan or its capacity reduced to mitigate impacts.

### Conclusions

2.104 The proposed allocation at Sutton Scotney is not justified or effective and should be removed from the Local Plan. The proposed allocation is not consistent with the settlement hierarchy and lacks key services to support growth. The site is also highly constrained and deliverability during the Plan period is uncertain. Bishops Waltham is a more sustainable location to accommodate a higher level of growth. Land at Mill Chase is a suitable, available and achievable site option on the settlement edge of Bishops Waltham that should be allocated in place of the Land at Brightlands allocation.

## Policy SW01 – Land at West Hill Road North, South Wonston

2.105 We object to the proposed allocation of Land at West Hill Road, South Wonston for 40 dwellings, which is not justified or consistent with the settlement hierarchy and the sustainability of the settlement in relation to available key facilities. There are reasonable alternative site options in the Market Town of Bishops Waltham which are more sustainable to accommodate a higher proportion of growth.

2.106 South Wonston is defined in the Local Plan settlement hierarchy as an ‘intermediate rural settlement’ which sits below the more sustainable ‘Market Towns’ and ‘Larger Rural Settlements’ in the Policy H3 Settlement Hierarchy. Consistent with national policy and the settlement hierarchy, it is more sustainable to direct a higher level of growth (than currently identified in the local plan) to Bishops Waltham.

2.107 A Settlement Hierarchy assessment<sup>14</sup> has been by the Council which provides an up-to-date assessment of settlements in the District to determine their place in the settlement hierarchy and to inform the Local Plan spatial strategy. Bishops Waltham scores highly in the Council’s assessment of daily facilities and services with only the settlement of Winchester City scoring higher. A comparative assessment of key services and facilities between Bishops Waltham, South Wonston and Sutton Scotney is set out in **Appendix 3** of these representations.

2.108 South Wonston is not a sustainable location to accommodate this level of growth and lacks an appropriate range of key facilities. The settlement lacks a regular public transport service, health facilities and employment opportunities.

2.109 Bishops Waltham is a sustainable Market Town appropriate to accommodate a higher level of growth than currently identified in the Local Plan. The settlement has a regular public transport service, Post Office, full range of healthcare facilities, a range

---

<sup>14</sup> Settlement Hierarchy Background Paper, WCC, August 2024.

of convenience and other retail, pre-school and primary school, excellent community facilities and a range of employment opportunities.

#### Land at West Hill Road North – Site Constraints

- 2.110 The Council’s Development Strategy and Site Selection Topic Paper 15 includes an appraisal of Land at West Hill Road North. The assessment identifies that site is in a prominent location and visible over a wider area in viewpoints to the north, including the Drove public right of way, Stainers Lane, Wonston Lane and Christmas Hill. The assessment concludes the site is in an area of high landscape sensitivity, contributes to the distinctive setting and identify of the village and protection from development is the preferred option.
- 2.111 South Wonston is affected by issues concerning water supply and wastewater infrastructure capacity. It is understood that the Council has engaged with Southern Water regarding a programme of infrastructure improvements in the area. However, there is uncertainty whether necessary improvements (to be delivered by Southern Water) providing sufficient capacity to accommodate development will be in place by 2030. Delays to WWTW improvements may also affect the ability to achieve nutrient neutrality in terms of nitrogen and phosphorus pollution of the River Itchen.
- 2.112 At Regulation 18, Hampshire County Council (transport) has raised concerns in relation to transport impact and highways safety. HCC has raised concerns regarding the ability to achieve safe and suitable site access that will not worsen highways safety issues on Alresford Road. Therefore, it is uncertain whether the site is deliverable in transport terms.

---

<sup>15</sup> Development Strategy and Site Selection Proposed Submission Plan, Appendix 3 – Initial Technical Appraisals

## Conclusions

2.113 In conclusion, the proposed allocation at South Wonston is not justified or effective and should be removed from the Local Plan. The proposed allocation is not consistent with the settlement hierarchy and the availability of key services to support growth. The site is also highly constrained and deliverability during the plan period is uncertain. Bishops Waltham is a more sustainable location to accommodate a higher level of growth



### 3. CONCLUSIONS

#### **Policy H1 Housing Provision**

- 3.1 Policy H1 is not justified, effective or consistent with national policy. The allowance of 1,900 dwellings towards unmet housing need from neighbouring authorities is insufficient to address definitive unmet housing need in the area which currently stands at 25,113 dwellings and rises to at least 33,521 dwellings with the proposed revised standard method. Furthermore, it is highly likely that unmet need will increase further in the area in relation to the impact of the revised standard method.
- 3.2 There is no effective strategy in place in the PFSH area to address current and future unmet housing need. Winchester City Council is in a position to make a greater contribution towards unmet need in relation to the availability of Land at Mill Chase in the higher order settlement of Bishops Waltham.
- 3.3 Policy H1 should be revised to include further greenfield sites to better address definitive unmet housing need in the area including the allocation of sustainable site options in the market Towns including Bishops Waltham. Furthermore, an appropriate buffer should be added to the housing requirement to ensure the housing requirement is provided for during the plan period taking account of potential delays in the delivery of strategic sites.

#### **Policy H2 – Housing Phasing and Supply**

- 3.4 Policy H2 is not justified or effective and may result in the Local Plan housing requirement not being provided for during the plan period or a continuous 5-year land supply maintained. Furthermore, it does not identify sufficient sites to address unmet housing need or include the most sustainable sites that are developable and consistent with the settlement hierarchy.

- 3.5 The Policy should be amended to bring forward sufficient greenfield sites in the first half of the Plan period. This will need to include suitable, available and achievable sites in the most sustainable settlements in the district including the Market Town of Bishops Waltham. Land at Mill Chase is relatively unconstrained, sustainably located in Bishops Waltham and capable of delivering about 50 homes in the first 5 years of the Plan period. The site is deliverable and does not require mitigation for phosphorus. The site should be allocated in the Local Plan and included within Policy H2 (phased in the first half of the plan period) to provide flexibility in housing land supply.

### **Policy H3 – Spatial Housing Distribution**

- 3.6 Policy H3 is not justified and is inconsistent with the Local Plan settlement hierarchy. The policy currently directs a disproportionate level of growth to lower order and less sustainable rural settlements (larger rural settlements and intermediate rural settlements). This includes the proposed allocations in Sutton Scotney (SUO1 Land at Brightlands, 50 – 60 dwellings) and South Wonston (SW01 Land at West Hill Road North, 40 dwellings).
- 3.7 A higher proportion of growth should be directed to the most sustainable settlements in the hierarchy including within the Market Town of Bishops Waltham. It is sustainable to deliver a higher level of growth in this location in relation to available services, facilities, local constraints and availability of good sites.
- 3.8 Land at Mill Chase provides the opportunity to deliver c50 dwellings in this sustainable location. The site is deliverable in terms of 'suitability, availability and achievability'.
- 3.9 The site is well connected by public transport services to Winchester, the rest of Hampshire and within comfortable walking distance of a range of key services and local facilities that would help support a sustainable community.
- 3.10 The site does not have a significant impact on landscape character and is not located within or adversely affect ecological sites of international, national or local

ecological importance. The site will maintain the integrity of the Bishops Waltham and Waltham Chase settlement gap.

3.11 Therefore, in accordance with the settlement hierarchy, Local Plan evidence and local constraints, land at Mill Chase should be allocated in the Local Plan and included within Policy H3 Spatial Housing Distribution. It can also be delivered within the next 5 years and provides a valuable contribution towards the housing requirement and current shortfall in relation to unmet housing need in the area.

3.12 The proposed allocations SUO1 and SWO1 should be deleted from the local plan as they are inconsistent with the settlement hierarchy and local constraints affect deliverability.

#### **Policy H4 – Development within Settlements**

3.13 Policy H4 is not justified as it does not include the sustainable site option of Land at Mill Chase within the proposed Bishops Waltham settlement boundary. Our response to Policy H3 sets out the full justification for allocating the site in the Local Plan and inclusion within the Bishops Waltham settlement boundary.

#### **Policy NE7 Settlement Gaps**

3.14 We object to Policy NE7, and the settlement gap as defined between Bishops Waltham and Waltham Chase. The proposed gap is not justified or consistent with national policy and should be amended to exclude Land at Mill Chase (SHELAA, BW11). Our response to Policy H3 sets out the justification for the allocation of the site and exclusion from the settlement gap.

3.15 The exclusion of Land at Mill Chase from the gap is consistent with the NPPF and Policy NE7 in not undermining the function of the gap and its intended role and retaining the separate identify of Bishops Waltham and Waltham Chase. The exclusion of the site from the gap will not impact on the integrity of the gap or lead to the coalescence of the settlements.

### **Policy BW4 – Land North of Rareridge Lane, Bishops Waltham**

- 3.16 We object to the proposed allocation of this site which is not justified or consistent with national policy. Furthermore, the Regulation 19 SA site assessment is not justified or legally compliant as the site assessment for BW17 fails to identify the landscape impact on the National Park.
- 3.17 The South Downs National Park Authority (SDNPA) have objected to the site at Regulation 18 due to impact on the National Park and their concerns have not been overcome as confirmed in the latest Statement of Common Ground. Therefore, the site is not suitable and should be deleted from the Local Plan.
- 3.18 Land at Mill Chase’ is suitable, available and achievable and does not have a significant impact on the setting of the National Park. The site is located adjacent to the south-east settlement edge of Bishops Waltham where views into and out of the site are prevented or screened by woodland, its low lying and flat topography and existing residential development.

### **Policy SU01 – Land at Brightlands, Sutton Scotney**

- 3.19 We object to the proposed allocation of ‘Land at Brightlands, Sutton Scotney’ for 50 – 60 dwellings which is not justified or effective and should be removed from the Local Plan. The proposed allocation is not consistent with the settlement hierarchy and the village lacks the key facilities to support growth. There is also significant uncertainty regarding the deliverability of the site in relation to constraints including waste-water infrastructure. There are more sustainable reasonable alternative options to support growth in higher order settlements including Bishops Waltham.

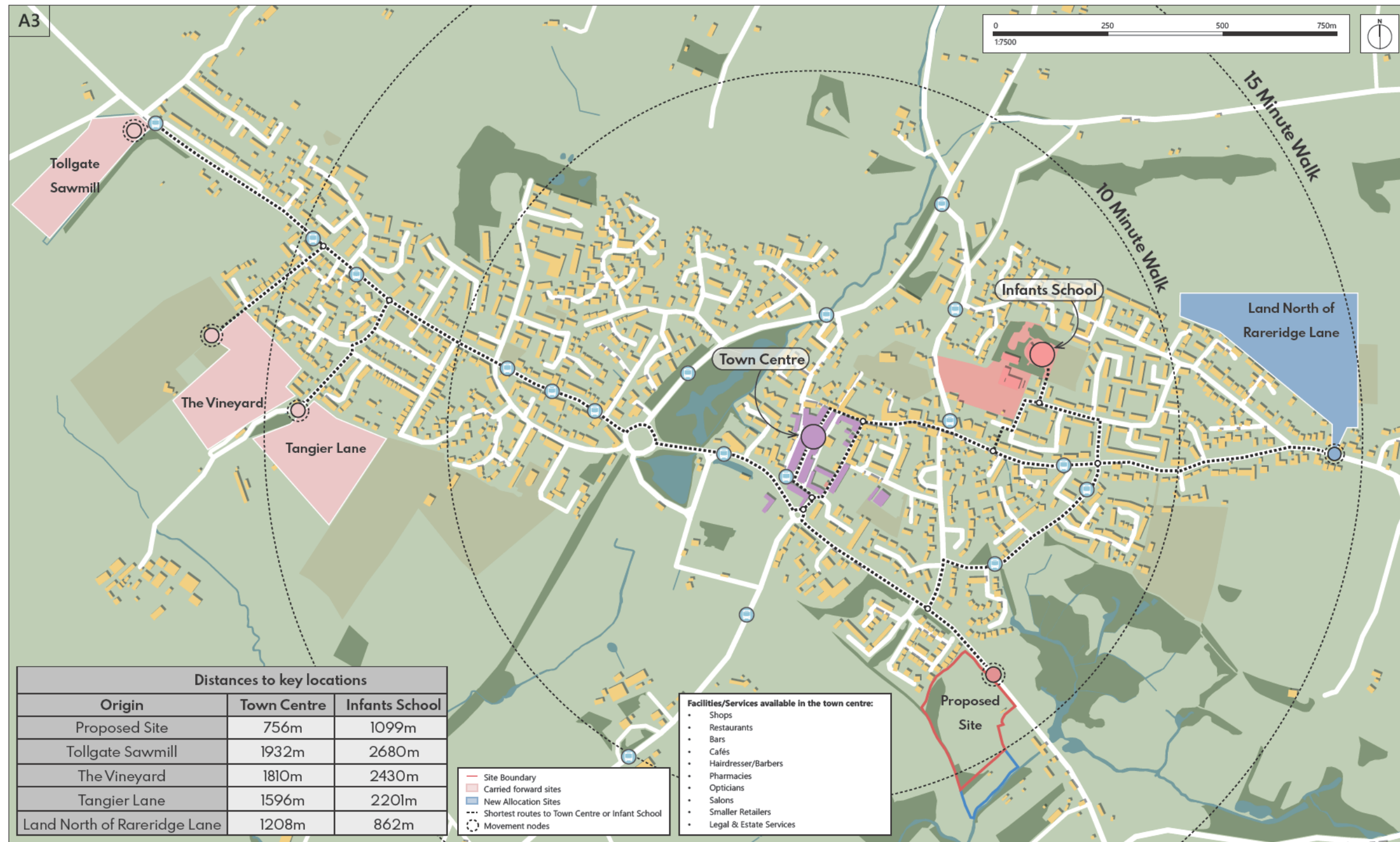
### **Policy SW01 – Land at West Hill Road North, South Wonston**

- 3.20 We object to the proposed allocation of ‘Land at West Hill Road North, South Wonston’ for 40 dwellings which is not justified or effective and should be removed from the Local Plan. The proposed allocation is not consistent with the settlement

hierarchy and the village lacks the key facilities to support growth. The site is highly constrained in landscape terms which makes it unsuitable for development as concluded in the Council’s evidence. There is also significant uncertainty regarding the deliverability of the site in relation to constraints including waste-water infrastructure. There are more sustainable reasonable alternative options to support growth in higher order settlements including Bishops Waltham.



**APPENDIX 1 LAND AT MILL CHASE - ACCESSIBILITY PLAN**



Romsey T: 01794 367703  
 Portishead T: 01275 407000  
 London T: 01794 367703

[www.thrivearchitects.co.uk](http://www.thrivearchitects.co.uk)

This drawing is the copyright of Thrive Architects Ltd. All rights reserved. Ordnance Survey Data © Crown Copyright. All rights reserved. Licence No. 100007359. Permission is granted to scale from this drawing for the purposes of Local Authority Planning Applications only. For all other purposes DO NOT scale from this drawing. Contractors, Sub-Contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect. Where applicable this drawing is to be read in conjunction with the Consultants' drawings / Clients' Construction Specification.

Rev	Description
P1	Preliminary Issue
P2	Additional Information Added

Date	Au	Ch
06.09.24	GR/AC	GR
23.09.24	GR/AC	GR

Project Land at Chase Mill, Bishops Waltham

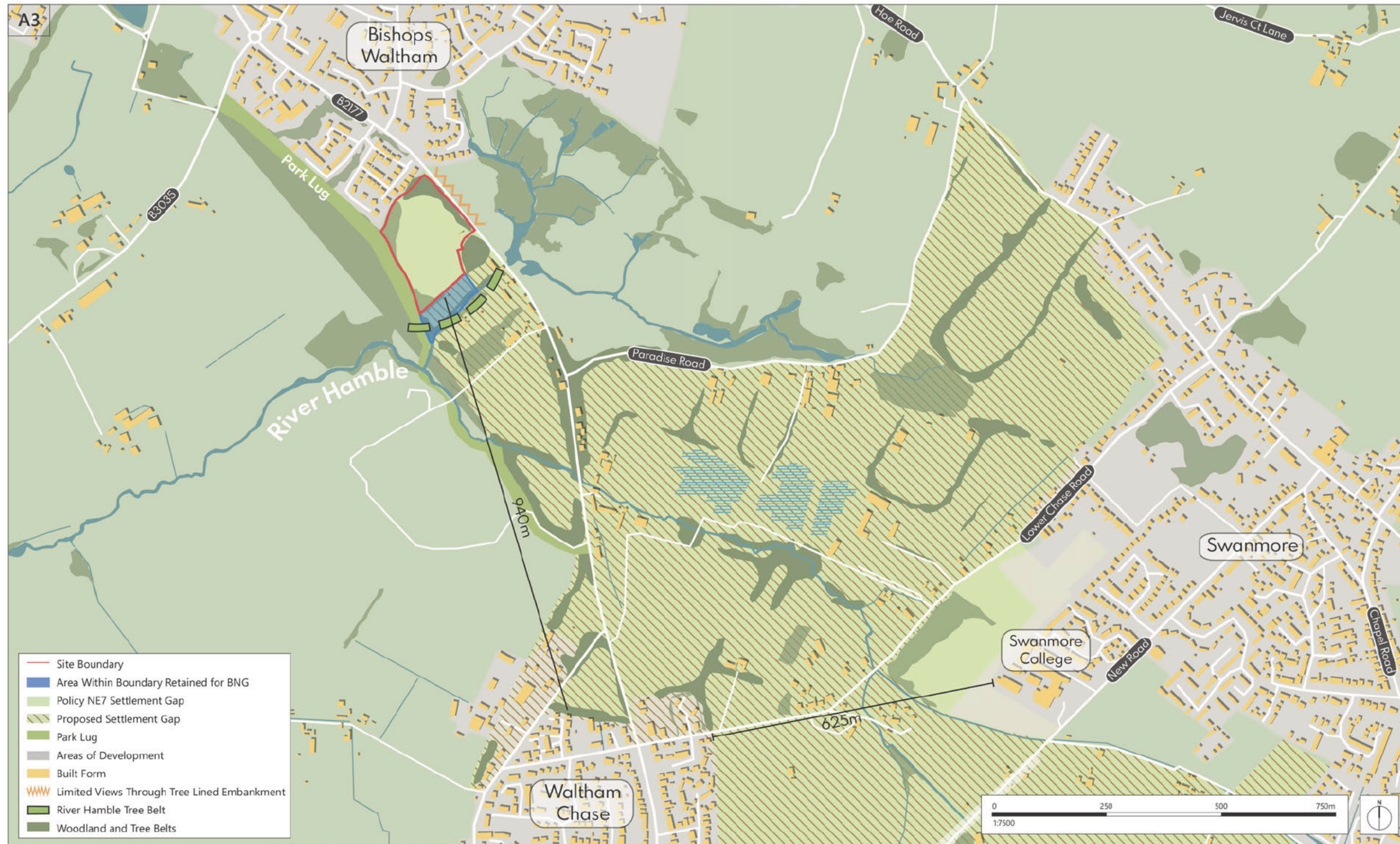
Drawing Development & Key Amenities Plan 01

Client	Landacre Developments
Job no.	LAND230816
Dwg no.	DKAP
Author	GR/AC
Status	Planning
Client ref.	-
Date	06.09.24
Rev.	P2
Scale	1:7500@A3
Office	Romsey





**APPENDIX 2 LAND AT MILL CHASE - SETTLEMENT GAP ANALYSIS**



Romsey T: 01794 367703  
 Portishead T: 01275 407000  
 London T: 01794 367703

[www.thrivearchitects.co.uk](http://www.thrivearchitects.co.uk)

This drawing is the copyright of Thrive Architects Ltd ©. All rights reserved. Ordnance Survey Data © Crown Copyright. All rights reserved. Licence No. 100007359. Permission is granted to scale from this drawing for the purposes of Local Authority Planning Applications only. For all other purposes DO NOT scale from this drawing. Contractors, Sub-Contractors and suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect. Where applicable this drawing is to be read in conjunction with the Consultants' drawings / Clients' Construction Specification.

Rev	Description	Date	Au	Ch
P1	Preliminary Issue	09.09.24	GR/AC	GR
P2	Revised Scale & Graphical Style	23.09.24	GR/AC	GR

Project Land at Chase Mill, Bishops Waltham

Drawing Settlement Gap Features

01

Client	Landacre Developments		
Job no.	LAND230616	Date	09.09.24
Dwg no.	SGF-01	Rev.	P2
Author	GR/AC	Checked	GR
Status	Planning	Scale	1:7500@A3
		Office	Romsey

Client ref. -







Romsey T: 01794 367703  
 Portsmouth T: 01275 407000  
 London T: 01794 367703

www.thrivearchitects.co.uk

This drawing is the copyright of Thrive Architects Ltd. All rights reserved. Ordnance Survey Data © Crown Copyright. All other drawings, text, or images are the property of their respective owners. Permission is granted to use this drawing for the purposes of local authority planning applications only for all other purposes (including any other drawings) without the prior written consent of Thrive Architects Ltd. Any reproduction or use of this drawing for any other purpose without the prior written consent of Thrive Architects Ltd is prohibited. Any dispute shall be referred to the arbitration of the Architects' Act 1997. This drawing is not to be used in conjunction with the Client's drawings or specifications.

Rev	Description	Date	By	Ch
P1	Preliminary Issue	19.06.24	GRAC	GR
P2	Added Information	23.09.24	GRAC	GR

Project Land at Chase Mill, Bishop's Waltham  
 Drawing Chase Mill Gap Features  
 01

Client	Landacre Developments		
Job no.	LAND202095	Date	16.08.24
Drawn by	GRAC	Rev	P2
Author	GRAC	Checked by	Scale 1:5000@A4
Status	Planning	Office	Romsey
Client ref			



**APPENDIX 3 BISHOPS WALTHAM, SUTTON SCOTNEY AND SOUTH WONSTON FACILITIES ASSESSMENT**

Settlement	Post Office	Healthcare			Other Facilities				Recreation and Open Space				Transport				Retail		Education				Community Facilities	High Speed Broadband	Employment			
		Doctors	Dentist	Opticians	Library	Petrol Station	Chemist	Bank	Children's Play Areas	Parks and Publicly Accessible Open Space	Outdoor Sports Facilities	Built Leisure	Daily Bus Services (hourly)	Daily Bus Services (Infrequent)	Weekly Bus Services	Main Line Train Station	Convenience	Other Convenience	Pre School	Primary School	Secondary School	Other Education			Church, Pub, Community Hall, Café, Restaurant	Access to superfast broadband	Access to any employment opportunity	2/3 Employment
<b>Bishops Waltham</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	N/A	N/A	No	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes
<b>Sutton Scotney</b>	Yes	Yes	No	No	No	Yes	No	No	Yes	Yes	Yes	No	No	Yes	N/A	No	Yes	No	Yes	No	No	No	Yes	Yes	Yes	Yes	Yes	
<b>South Wonston</b>	Yes	No	No	No	No	No	No	No	Yes	Yes	Yes	No	No	Yes	N/A	No	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	Yes	No	

**Conclusions**

**Sutton Scotney**

Sutton Scotney is not a sustainable settlement to accommodate growth and lacks an appropriate range of key facilities. The settlement lacks a regular public transport service, primary school, appropriate range of health facilities and retail.

**South Wonston**

South Wonston is not a sustainable settlement to accommodate growth and lacks an appropriate range of key facilities. The settlement lacks a regular public transport service, health facilities and employment opportunities.

**Bishops Waltham**

Bishops Waltham is a sustainable Market Town appropriate to accommodate significant growth. The settlement has a regular public transport service, Post Office, full range of healthcare and other facilities, a range of convenience and other retail, pre-school and primary school, excellent community facilities and a range of employment opportunities.



## APPENDIX 4 LAND AT MILL CHASE – PROPOSED SITE ALLOCATION POLICY

<b>Land at Mill Chase, Winchester Road, Bishops Waltham</b>
<p>Land at Mill Chase, Winchester Road as shown on the Policies Map, is allocated for about 50 dwellings. Planning permission will be granted provided that details accord with the Development Plan and meet the following specific requirements:</p> <p><b>Nature and Phasing of Phasing of Development</b></p> <ul style="list-style-type: none"><li>i. The development must be informed by a landscape-led masterplan which considers the existing built form, heritage assets, landscape character, topography and key public views.</li><li>ii. The development is phased for the first half of the plan period before 2030;</li></ul> <p><b>Access</b></p> <ul style="list-style-type: none"><li>iii. Provide for safe vehicular access via a new junction off the Winchester Road including secondary pedestrian access;</li><li>iv. Provide satisfactory attractive and legible pedestrian and cycle links to Bishops Waltham centre.</li><li>v. Provide improved access to the existing PROW network including those adjacent to the southern and eastern site boundary;</li><li>vi. Provide small parking area to enable access to PROW network and South Downs National Park;</li><li>vii. Provide or contribute to improved bus stop waiting facilities for new residents including new seating and if appropriate a covered shelter to support public transport usage;</li><li>viii. Provide or contribute to the reduced speed limit to 30mph and a new village gateway on Winchester Road to the south of the site.</li></ul> <p><b>Environmental</b></p> <ul style="list-style-type: none"><li>ix. Provide appropriate landscaping to create a new settlement edge, local gap boundary (in accordance with Policy NE7) and to mitigate the impact upon the nearby listed buildings to the south;</li><li>x. Avoid unacceptable impacts on the historic significance of the Park Lug. Undertake necessary assessments to define the extent and significance of the Park Lug and to reflect this in the proposals;</li><li>xi. Assess and mitigate the impact upon nearby listed buildings to the south.</li><li>xii. Protect, retain and reinforce existing treed boundaries and hedgerows including tree belt along Park Lug;</li><li>xiii. Minimise the impact of the access points on the Moors Site of Special Scientific Interest (SSSI);</li></ul> <p><b>Other Infrastructure</b></p> <ul style="list-style-type: none"><li>xiv. Provide open space to serve the development in accordance with Policy NE3; and</li><li>xv. Identify and contribute to infrastructure needed to make the development acceptable in planning terms.</li></ul>

**LUKEN  BECK**

Management | Development | Planning

W: [lukenbeck.com](http://lukenbeck.com)

T: 01962 672 560

59 Tower Street  
Winchester  
SO23 8TA