



Winchester City Council
Proposed Submission Local
Plan Update 2020-2040

Regulation 19 Consultation

October 2024

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1.0 Introduction

- 1.1. Foreman Homes welcome the opportunity to comment on Winchester City Council’s pre-submission stage (Regulation 19) consultation on the Winchester District Local Plan 2020-2040. These representations are made in the context of our land interest at Colden Common Farm, shown in Appendix 1.

2.0 Land at Colden Common Farm

- 2.1. The site is located in Colden Common, to the east of the B3354 Main Road. There is existing access to the site, which currently comprises Colden Common farm and its buildings. The site is in the countryside and extends some distance from the Main Road toward the South Downs National Park area further to the east.
- 2.2. The site has been assessed through the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA) under reference CC02 and is allocated in the Pre-Submission Plan under Policy CC2.

3.0 Strategic Policy H2

<i>Relevant Chapter, Policy, Figure or Paragraph:</i>	Strategic Policy H2 ‘Housing Phasing and Supply’ Paragraph 9.24		
<i>Do you consider the policy and supporting text are:</i>	<i>Legally Compliant</i>	<i>Sound</i>	<i>Complies with Duty to Co-operate</i>
	No	No	No

- 3.1. Strategic Policy H2 proposes a phased trajectory for greenfield allocations, whereby development of 795 dwellings on greenfield site allocations is restricted until the latter half of the plan period, including Site Allocation CC2, Colden Common Farm. Paragraph 9.23 explains that this is to maintain a reasonable level of provision in these phases and prevent all housing provision being built out in the early years of the plan.

Strategic Policy H2

Housing Phasing and Supply

Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. The following sites will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time:

- W4 – Courtenay Road, Winchester (150 dwellings)
- BW4 – North of Rareridge Lane, Bishops Waltham (100 dwellings)
- NA3 – Alresford Neighbourhood Plan, New Alresford (100 dwellings)
- CC2 – Colden Common Farm, Colden Common (45 dwellings)
- CC3 – Land at Main Road, Colden Common (35 dwellings)
- CC4 – Land adj 85 Church Lane, Colden Common (10 dwellings)
- DEN1 – Denmead Neighbourhood Plan, Denmead (100 dwellings)
- WK5 – Mill Lane, Wickham (40 dwellings)
- WK6 – Southwick Road / School Road, Wickham (60 dwellings)
- OT01 – Land East of Main Road, Otterbourne (55 dwellings)
- SW01 – Land at West Hill Road North, South Wonston (40 dwellings)
- SU01 – Brightlands, Sutton Scotney (60 dwellings)

- 3.2. The plan conflicts with paragraph 75 of the NPPF as it is unsupported by any detailed trajectory on housing delivery over the period to 2040 and associated evidence to justify that the brownfield sites and quantum would be developable in the first half of the plan period. Paragraph 9.24 of the plan rightly acknowledges that Brownfield sites often have a long lead in time in terms of delivery. The development of brownfield sites is generally complex, with greater constraints including demolition, site contamination and remediation for example. This therefore conflicts with the approach in H2 to phase these towards the earlier parts of the plan period.
- 3.3. The proposed approach is wholly inconsistent with the Government’s objective to significantly boost the supply of housing and with NPPF paragraph 60 which requires that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Restricting new development in the first half of the plan period to those existing allocations and brownfield sites prevents an even distribution of growth across the district and does not allow for a range and choice of available, suitable and deliverable sites to come forward in line with paragraph 69 of the NPPF.
- 3.4. The Written Ministerial Statement of July 2024 confirms the existence of acute housing needs and a national crisis of housing, which must be addressed now. The phased approach in H2 has not been

positively prepared to align with Government’s clear direction of travel to increase the delivery of homes. There should not be barriers placed on the delivery of housing on sites that are immediately available, suitable and can be built out quickly.

- 3.5. The Plan should encourage the delivery of brownfield sites whilst not artificially restricting the delivery of available and suitable greenfield sites, which are capable of delivering homes, including affordable homes, immediately and in greater numbers.

Summary/Recommendations

The phased housing trajectory is not justified or positively prepared to achieve sustainable development.

4.0 Policy CC2 Colden Common Farm

Relevant Chapter, Policy, Figure or Paragraph:	Policy CC2 ‘Colden Common Farm Paragraphs		
Do you consider the policy and supporting text are:	Legally Compliant	Sound	Complies with Duty to Co-operate
	Yes	No	No

- 4.1. FHL support the allocation of Colden Common Farm through Policy CC2, however, we strongly object to the inclusion of a phasing restriction under criterion (i).
- 4.2. All settlements should be allowed to naturally expand, particularly in an area designated as a ‘larger rural settlement’ described as being a ‘thriving village’ such as Colden Common. Colden Common scored highly in terms of ‘Daily Facilities/Services’ and ‘Other Facility or Service’ in the Council’s Settlement Hierarchy Review¹ and therefore represents a sustainable location for future growth. Despite this fact, Policy CC2 Colden Common Farm, Policy CC3 Land at Main Road and Policy CC4 Land adjoining 85 Church Lane are all subject to this same phasing restriction. It is not sound to artificially restrict a sustainable settlement’s growth in this way.

¹ WCC Review of Settlement Hierarchy 2022 < <https://www.winchester.gov.uk/assets/attach/33297/Settlement-Hierarchy-Review-2022-September-2022-Update-Final.pdf>>

- 4.3. The only allocation within Colden Common that is not subject to the 2030 phasing is Clayfield Park (Policy CC1). This allocation has been carried over from the Winchester District Local Plan Part 2 – Development Management and Site Allocations (LPP2) which was adopted in 2017. Existing commercial uses on the site as well the potential for the requirement for remedial measures as a result of current uses and historic use of the Clayfield site as a brick works mean that this isn't a straightforward site to bring forward for development and yet it is included in the Council's five-year housing land supply with development anticipated to commence in 2027/28². No evidence has been provided to demonstrate why this site, which has benefited from an allocation since 2017, is now considered deliverable in the first five years of the plan. For this reason, other sites in Colden Common should be able to be brought forward earlier, including land at Colden Common Farm.
- 4.4. As detailed in our response to Policy H2, the phasing restriction is unsound and wholly inconsistent with the Government's objective to significantly boost the supply of housing in line with Paragraph 60 of the NPPF. Furthermore, the Written Ministerial Statement of July 2024 confirms the existence of acute housing needs and a national crisis of housing, which must be addressed now. The phased approach to Policy CC2 has not been positively prepared to align with Government's clear direction of travel to increase the delivery of homes. There should not be barriers placed on the delivery of housing on sites that are immediately available, suitable and can be built out quickly.

Summary/Recommendations

The phased housing trajectory is not justified or positively prepared to achieve sustainable development.

5.0 Conclusion

- 5.1. Colden Common represents a highly sustainable location for future growth within Winchester District and as such FHL wholly support the allocation of Land at Colden Common Farm. However, we consider that the phasing restriction in criterion (i) is unjustified and unsound and should be removed from both Policy H2 and CC2.

² WCC Authorities Monitoring Report 2022-2023 Appendix < <https://www.winchester.gov.uk/assets/attach/37632/AMR-2022-2023-Appendix.pdf>>

Appendix 1: Site Location Plan

