

Winchester District Draft Local Plan 2040

Regulation 19 Consultation

Consultation Response

Land at Ravenswood House, Knowle

Prepared on behalf of Homes England October 2024



Document control

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1.0 INTRODUCTION

- 1.1 This representation is prepared by Tetra Tech Ltd on behalf of Homes England in response to the Winchester City Council (WCC) Draft Local Plan Regulation 19 consultation.
- 1.2 The site at Ravenswood House, Knowle has previously been promoted for development and is subject to a live outline planning application which has delegated approval, subject to the signing of a 106 agreement. The WCC application reference is 18/01612/OUT.
- 1.3 We thank WCC for providing the opportunity to comment on this latest version of the plan. This representation focuses on proposed allocation Policy KN1 (Previously known as WK4) which allocates the site for 200 homes alongside significant community benefits including large areas of new public amenity space at the Meon Water Meadows and Knowle Triangle. Homes England are in support of the policy and this representation principally sets out a brief summary of the reasons why. It will also clarify a few points in the allocation policy and supporting text to make sure the policy is as accurate and clear as possible.



2 POLICY KN1 – RAVENSWOOD

- 2.1 Homes England SUPPORT allocation Policy KN1
- 2.2 The site benefits from an 'undetermined' outline application for the development of the site. The description of development reads as follows:
 - Community led proposal to develop 200 new homes including affordable housing, with associated access, landscaping, parking and open space.
- 2.3 The application has the delegated approval of Officer's at WCC subject to final agreement of the S106, with an expected positive decision in due course. The proposals align with each of the draft criteria of Policy KN1.
- 2.4 The proposals include:
 - Up to 200 homes including 40% affordable housing
 - Safe access from Knowle Avenue utilizing the existing roundabout
 - Pedestrian and cycle linkages to Mayles Lane and Knowle Village
 - Facilitates connection to the Mon Trail via the Meon Water Meadows
 - Provides for a strong landscape buffer to Ravenswood Hospital, Ravens
 Wood and Dash wood, protecting them from adverse impacts
 - Significant levels of Open Space and new Green Infrastructure to serve the development and wider community
 - Provides appropriate and justified contributions towards infrastructure to mitigate the effects of the development.
 - Protects the integrity of important ecology sites, including the Solent SPA.
 - Provides for a strong undeveloped gap between Knowle, the development site and the future Welborne development through the provision of Knowle Triangle as Green Infrastructure.



3 Proposed Minor changes

3.1 As above, Homes England support the policy but suggest some minor revisions to the criteria of the draft allocation policy wording to improve the policy's effectiveness, taking account of site requirements. The table below identifies the suggested changes and a brief explanation.

Change to Policy Wording	Explanation	
i. Provide a safe vehicle, pedestrian and cycle access in accordance with Policy T3 which minimizes the impact on existing residential properties;	As previously suggested, Homes England recommends WCC Delete criterion 1 – whilst the premise of the criterion is agreed (i.e. the provision of safe access for all), it is unnecessary given the provisions of draft Policy T3 and existing provisions in the NPPF.	
ix. Provide a connection to a the nearest point of adequate capacity in the sewerage and water supply network, in collaboration with the service provider.	Homes England have also previously suggested an alteration to Criterion 9. It is recommended that WCC remove the requirement to connect to the nearest connection point in order to provide some flexibility to connect to an alternative provider (given there is more than one provider in the locality).	
vi. Demonstrate how groundwater will be protected	Homes England recommends WCC Delete criterion 6 – whilst the premise of the criterion is agreed (the protection of groundwater in the area). This new policy point is deemed as unnecessary as guidance on this is laid out by the supporting text at 14.139 of the Regulation 19 plan which refers to the new Local Plan Policy NE16. Homes England have already adhered to this guidance following the Regulation 18 plan and have submitted a nutrient mitigation plan to ensure ground water protection for the area. In addition to this consultation comments from Natural England confirm they have no further concerns over groundwater protection (this has also been included in the planning application documents). The IIA report also reported this scheme to have a negligible effect on water resources, suggesting this policy is unnecessary.	



3.2 One amendment is also required to the supporting text at 14.140 in relation to education contributions. This was previously recommended, and wording has changed to suggest "a contribution towards a secondary expansion may be required". However, Homes England recommends this paragraph be deleted from the guidance as communication from Hampshire County Council, Children's Services Department has confirmed that in addition to primary education services not requiring a development or contribution, secondary services will also be able to accommodate the development without such. The relevant correspondence is attached at Appendix 2.



4 INTEGRATED IMPACT ASSESSMENT REPORT

- 4.1 As above, Homes England support the sites proposed allocation under Policy KN1. To help support the sites allocation, it is suggested that at the next stages of the plans development the significant amount of technical work to support the current application on the site are considered to inform the Integrated Impact Assessment Report (IIA).
- 4.2 This was previously recommended by Homes England as response to the Regulation 18 consultation however the summary of IIA findings has not changed between the regulation 18 and regulation 19 findings.
- 4.3 The extensive documents laid out alongside Homes England's Planning applications should provide sufficient evidence in consideration to the positive impacts of the scheme whilst the IIA findings suggest only negative or negligible impacts of the scheme.
- 4.4 Homes England would once again like to highlight the Meon Water Meadows and Knowle Triangle, a key benefit of the scheme that the technical plans provide detail on. The results of the IIA report do not seem to take the full extent of this scheme and its positives into its calculations as there are many positives as proven by provided consultation responses to the scheme. The IIA report acknowledges the positive effect on health and wellbeing but does not seem to acknowledge the potential impacts this scheme has on Climate Change Mitigation, Travel and Air Quality, landscape and the sites Historic Environment. The plans for the scheme provide evidence that not only does this scheme's proposals align with those set out in proposed policy KN1 and allow for better promotion and access to active sustainable travel, it also protects the land as required within policy KN1.
- 4.5 As already highlighted, Homes England has also provided sufficient evidence via consultancy on the protection of water resources and laid out a nutrient mitigation plan for the area. Homes England would therefore argue IIA12: Natural Resources should not be within the "significant negative effect likely" category.
- 4.6 Homes England recommends a review of the IAA report based on the provided evidence associated with the planning application. Consultations and officer reports confirm the benefits of the scheme and its suitability for adhering to the policies as set out in policy KN1 in the Regulation 19 Plan.



5 CONCLUSION

- 5.1 Homes England have welcomed the opportunity to participate in the WCC Draft Local Plan Regulation 19 consultation. We support Policy KN1 and the allocation of the site at Ravenswood, Knowle for 200 homes and associated community benefits.
- 5.2 Homes England would be happy to discuss the site and progress with the current planning application further if that would be of assistance.