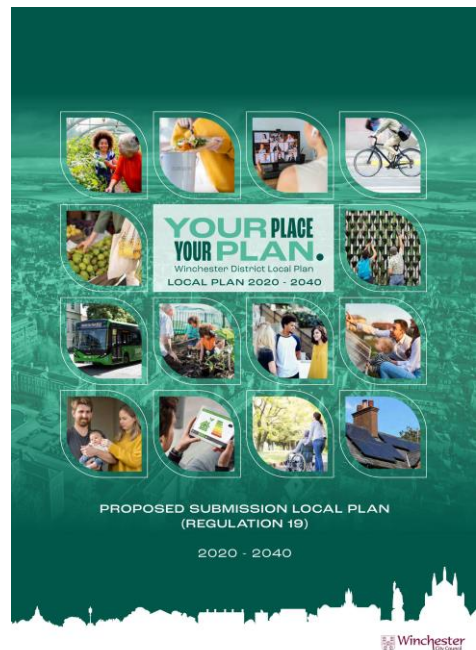


Winchester District
Local Plan: -
Regulation 19 Consultation



Land at Texas Drive
Oliver's Battery

On behalf of
Montare LLP & Weatherstone Properties Ltd

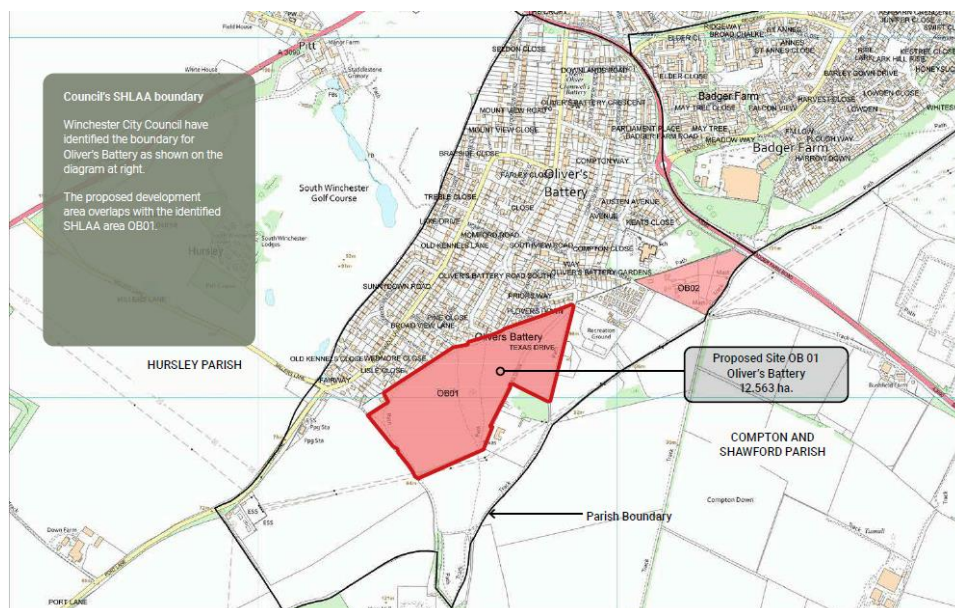
October 2024

1.0 Introduction

- 1.1 These representations are prepared jointly on behalf of Montare LLP & Weatherstone Properties Limited, as the land promoters/master developers and freehold owners of the site respectively. Our representations remain largely unchanged from the Regulation 18 stage, since the merits of the subject site as a development allocation continue to go unrecognised by the Local Plan Policy team.
- 1.2 These representations therefore object to the site's continued exclusion (up to and including this Regulation 19 version) as a potential logical and sustainable allocation for residential development and green space/biodiversity area at Olivers Battery. We also seriously question the rationale for not pausing the process at this point to take stock and due regard of the Government's new emerging NPPF's housing policies; definitions; targets; and standard methodology for housing delivery.
- 1.3 The subject site has been actively promoted by the owners since 2013, as supported by a whole range of specialist consultant inputs and appraisal reports over the years, including landscape; landscape/visual; ecology; sustainability and highways. The owner has teamed up with Montare LLP to further promote the land through development of an exemplary multi-disciplinary masterplan concept to deliver a sustainable vision for the site. Winchester City Council (WCC) Officers (both within Planning Policy & Housing) are aware of this ongoing work including Montare's engagement and dialogue with Olivers Battery Parish Council. A presentation was made to the Parish Council and local residents on 4th October 2022.

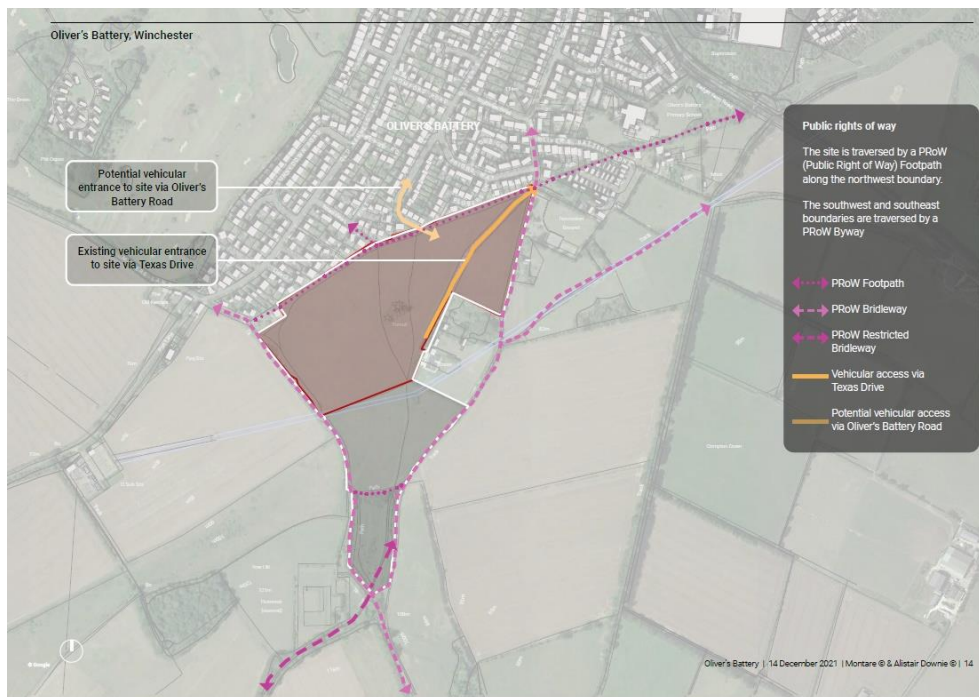
2.0 Site Context

- 2.1 The subject site is located on land at Texas Drive in Oliver's Battery, Winchester, approximately 3 miles south of Winchester City Centre. The site extends to approximately 18 hectares. Access to the site is principally from Compton Way onto Texas Drive, which cuts across a portion of the site, or is taken from Oliver's Battery Road South.



Site in the context of the Oliver's Battery Parish boundary

- 2.2 The north western boundary to the site is formed by existing residential properties within the defined settlement. A caravan park is situated to the north east of the site. Two residential properties are located to the east of the site accessed off Texas Drive which are screened by dense landscaping. The eastern and western borders of the site are bounded by undeveloped land.
- 2.3 A public footpath runs along the northern boundary of the site, adjacent to existing residential properties, and a bridleway runs along the eastern boundary of the site (see below). The Yew Hill Butterfly Reserve is located within the southern tip of the site.



Existing access, PRoW and bridleways

- 2.4 The site is well located in terms of its proximity to public transport links (both with the rail network and good local bus routes). Winchester railway station is approximately 3.5 kilometres to the northeast and Shawford railway station is also located nearby, providing services to Weymouth and London Waterloo.
- 2.5 A local commercial area is located nearby on Oliver's Battery Road South, some 600 metres to the north. This is defined as a Local Centre at Strategic Policy E3 (Town Centre Strategy & Hierarchy). There are also good and wide ranging educational and healthcare facilities available within the local area, as well as a number of sports and leisure facilities.



3.0 Rationale for Inclusion

- 3.1 There is a strong synergy between the conceptual development ideas for the subject site and many of the key themes of the Reg19 Plan, which are centred around achieving sustainable development; these themes are fully endorsed. Our initial conceptual layout plan, as presented to the Parish Council, is attached as Appendix 1. The reasons why we consider that the subject site should be allocated for residential development are set out below under the relevant theme headings:-

Creating a Vibrant Economy

- 3.2 Oliver's Battery (OB) is defined as a 'local centre' (see Strategic Policy E3), which recognises that there are a variety of uses accommodated and its role as an important community hub that provides the opportunity for residents to be able to shop locally for their day to day needs and avoid the need to travel. The plan accordingly also recognises that it is important to maintain uses within this centre (as within all local centres) to support their role and not to undermine the vitality and viability of the centre.
- 3.3 By going down a route of 'no change' for OB in the Plan, with no housing sites currently identified, WCC are not being consistent in the recognition of this status, and evidently not even attempting to address the local housing needs of the Parish. Neither are they following the previous Local Plan Inspector's advice (Inspector Nigel Payne's report of 31st January 2017) which agreed that there was scope for some new development in sustainable locations around the town and that his proposed early review exercise should include a full and comprehensive examination of the Winchester town/boundary areas (see para 20).
- 3.4 The settlement is clearly a sustainable location for accommodating some level of growth and housing development. By not selecting any potential new sites at OB, the settlement will eventually stagnate and gradually lose its vitality and viability. Alternatively, a route of accommodating some limited growth and appropriate additional new homes, with an injection of new lifeblood and associated increased expenditure into OB's local catchment area would enhance its overall critical mass and help to underpin the long-term viability of the centre's existing shops and services, as well as having the potential to serve as a catalyst to local economic growth in OB and Winchester generally.
- 3.5 In this regard, Montare would welcome discussions with the Council's Economic Development Officer to explore options for the inclusion of complementary uses within the scheme (eg. flexible commercial space at affordable rents). Notwithstanding, there is complementary locational relationship with the Bushfield Camp employment allocation (Policy W5) for high quality business and complementary uses to the east of OB. A residential development allocation at OB would have a synergy with this nearby employment allocation and ensure that there is no mis-match between employment and housing growth strategies at the local level. It is also noted that this development allocation sits within the same Winchester-Compton Street local gap designation as the subject site.

Providing Homes for All

- 3.6 The subject site has the potential to make a valuable contribution to the creation of sustainable mixed and balanced communities, including a fully policy compliant affordable housing scheme. One possible option is setting up a Community Land Trust; an initiative which Montare have experience in and they have duly offered their help and expertise to the Parish Council if the interest is reciprocated. There is also continued interest from WCC's Housing Department to explore the provision of Council Housing on part of the site.
- 3.7 With reference to Policy SP2 (Spatial Strategy & Development Principles) and Policy H3 (Spatial Housing Distribution), the Winchester Town Area (within which OB falls) continues to be overly reliant on the completion of the Kings Barton development (which has failed to deliver housing at the rates assumed by WCC in the past and is simply carried over from the previous Local Plan) and a high level of windfalls being delivered. These two components combined disproportionately account for over 45% of the total housing target set for this area at 5,643 homes, with new allocations providing for only 29%. This strategy is not robust or ambitious enough in our view, and does not reflect the Inspector's steer on looking towards sustainable locations around the town to accommodate some growth. Neither is it consistent with WCC's favoured blended development strategy, based largely around the approach of distributing development to a sustainable hierarchy of settlements, with this approach receiving the most support in the previous *'Strategic Issues and Priorities'* consultation. As an important local centre, OB should clearly not be ignored and should look to responsibly accommodate some degree of limited growth to meet with its local housing needs.
- 3.8 No doubt the ultimate housing numbers to be delivered will be subject to rigorous testing through the Local Plan Examination process, but it seems illogical not to embrace this particular opportunity as an allocation. This will be brought into even sharper focus upon the adoption of the new NPPF with its higher housing delivery targets and associated policy drive for achieving economic growth. Moreover, not to provide any housing requirement for any of the outlying neighbourhoods of Winchester, with the town clearly recognised as being the most sustainable settlement in the district, is contrary to the sustainable development themes which run throughout the entirety of the Plan itself. As currently drafted, there is therefore a mis-match between the allocations themselves and WCC's positive housing policies, particularly concerning the delivery of affordable housing and meeting objectively assessed local housing needs.

Achieving carbon neutrality & low carbon infrastructure

- 3.9 The draft Local Plan quite rightly puts carbon neutrality and sustainability issues both front and centre, with developers being required to demonstrate how they are addressing carbon and climate change issues, and with corresponding measures to be integrated into the design process at the planning application stage. This approach is fully endorsed by Montare and is already fully embedded in both their ethos and practice.
- 3.10 In respect of their masterplan work for the subject site at OB, it will incorporate the highest standards of sustainable design and construction, including the most appropriate renewable energy technologies, and consistent with best practice, a *'fabric first'* approach will be adopted. The objective to provide net zero carbon homes, across both the private and

affordable sectors, will be paramount. As such, an allocation at OB would result in complete alignment of WCC's sustainability policies and implementation of best practice on the ground.

Enhancing bio-diversity and the natural environment

- 3.11 The site would incorporate generous areas of open space and extension of the Yew Hill Butterfly Reserve, together with other bio-diversity benefits. This would create an attractive green setting for the new development, which would not only meet open space provision for the prospective residents but would also help to address other existing local shortfalls. The relationship of the site with the Butterfly Reserve is special and unique to this particular location, and together with the opportunity for a significant public open space offer to the local community, distinguishes it from any of the other competing edge of settlement sites.
- 3.12 The recent introduction of the Biodiversity Net Gain (BNG) mandatory requirement into planning legislation is an onerous one and many developers will inevitably find it difficult to satisfy it without relying on 'off-site' solutions. Due to the bespoke bio-diversity and open space provision being planned for the subject site as part of its blue & green infrastructure strategy, it is extremely well placed to go above and beyond the BNG requirement to be delivered 'on-site'.
- 3.13 In terms of open space provision, not only will the scheme be policy compliant (with reference to WCC's emerging policy NE11 – Open Space Provision for New Developments), it proposes to specifically offer designated public open space to the Parish Council as part of a bespoke Section 106 offer, securing it as a significant community benefit 'in perpetuity'.
- 3.14 In terms of landscape sensitivities, a previous criticism levelled at the site is that it falls within the 'Winchester/Compton Street' gap. With reference to WCC's emerging policy NE7 (Settlement Gaps), it is instructive to consider the guidance strategic criteria for such designations provided by The Partnership for South Hampshire (PFSH), as follows:-
- The open nature/sense of separation between settlements can not 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
- 3.15 Removing the developable extent of the subject land from this designation would be consistent with this guidance and would not compromise the integrity the gap. The Local plan review process should properly take the opportunity of a fine grain analysis to inform the site allocations.

Such analysis, in our view, would conclude that the site plays no particular role in preventing the coalescence of settlements, given that;-

- the nearest settlement is the scattered linear village of Compton Down located some 1km to the south
- the site is visually contained by natural landform and vegetation
- a sensitive and robust landscaping strategy would ensure that there would be no visual impact from the north of Compton Down.

As such, the land does not play any significant role in the visual or physical separation of the settlements of Winchester and Compton Down; nor does it make an important contribution to the setting of Winchester and its identity.

3.16 Additionally, it is important to note that the evolving masterplan is being informed by specialist landscape architects, incorporating the following principles:-

- Retention and enhancement of existing landscape features, assisting visual integration of the development by strengthening boundary planting.
- Retention; enhancement and management of existing hedgerows with associated verges
- Provision of internal site landscape structure and ecological corridors
- Protection; extension and enhancement of butterfly reserve reflecting its high ecological value and visibility
- Incorporation of development exclusion zones reflecting site sensitivities
- Incorporation of sympathetic external materials palette that will respond to local vernacular and character

3.17 With reference to the masterplan's landscape principles, as illustrated at Appendix 1, it can therefore be seen that the visual envelope of the developable areas will be relatively limited in the context of the entire site area and that overall the scheme will be beneficial (rather than harmful) in terms of landscape and bio-diversity net gains. The current local gap designation is not a justified ground for opposition to the proposals and as referenced earlier it is noted that the Bushfield Camp employment allocation is similarly located within it.

Conserving and enhancing the Historic Environment

3.18 The initial masterplan has been developed cognisant of the potential for buried archaeological remains in the area and the location of the two Scheduled Monuments (prehistoric burial mounds). A geophysical survey has been undertaken to further explore the potential for buried archaeological remains and the results suggest limited interesting remains within the possible development footprint.



3.19 Consistent with the Council's view (under Policy NE9) that designated and protected features should not be seen as a constraint to change, but as a catalyst for regeneration and diversification, bringing economic, cultural and educational benefits, the scheme seeks not only minimise or avoid adverse impacts, but to '*celebrate*' the presence of the scheduled burial mounds and enhance the experience of the monuments in the landscape. This is fully consistent with WCC's emerging policy HE6 (Scheduled Monuments and nationally important non-designated assets) in that the development proposals will seek to preserve the important parts of their setting.

Promoting Health & Wellbeing

3.20 This earlier theme in the initial consultation draft is now embraced by the 'High Quality Well-Designed Places and Living well' chapter and there is clearly a strong cross over with the Sustainable Transport objectives (as below). In this regard, the masterplan will include interactive spaces with strong visual connections across the site which will link both to the existing village and the surrounding countryside beyond. It will incorporate extensive footpath and cycle path links, as well as a trim trail and play space.

3.21 The provision of significant areas for public open space is a key offering of the development proposals recognising the importance of this issue to the both the Parish Council and local community generally. Recreational benefits for both existing and prospective residents alike will therefore result from the development to be secured through the proposed Section 106 provisions.

Promoting Sustainable Transport & Active Travel

3.22 SLR are appointed as our Sustainable Transport consultants who promote the concept of a 15 minute neighbourhood for the site through maximising opportunities for walking and cycling as far as possible.

3.23 It should be noted that earlier pre-application discussions with the County Highway Authority indicated that any development proposals could include an improvement to Stagecoach service No2 (or other bus service as appropriate) as a sustainable transport benefit facilitated by bringing the site forward. Montare is keen to work together with the County Council in

helping to deliver such sustainable transport initiatives as part of their proposals. The use of car clubs will also be explored as a possible measure to reduce reliance on private cars.

- 3.24 It is also important to note that that the Highway Authority raised no objections to the principle of development on highway grounds. This included discussions with them concerning the implications of possible improvements to the junction of Badger Farm Road and Oliver's Battery Road South. A highways scheme was duly prepared at that time and could now be re-assessed for potential inclusion as part of a wider package of scheme benefits. The view of the local community will be sought on this matter.

4.0 Conclusion and Way Forward

- 4.1 It is difficult to see how the alignment of the Local Plan's overarching themes and policies could possibly be any closer to the principles adopted by the site specific masterplan concept for Oliver's Battery. These synergies provide significant and distinct advantages that it has over other competing sites in the District, particularly in terms of its open space and bio-diversity offering.
- 4.2 The site's selection could easily be aligned with the Council's direction of travel on their emerging growth strategy by identifying Oliver's Battery, a recognised sustainable neighbourhood and local centre within the Winchester Town area, as an opportunity for appropriate growth to meet local needs. This would also align with the previous Local Plan Inspector's advice to consider sustainable locations for development around the edge of Winchester, which is now even more pertinent in the context of the Government's emerging NPPF.
- 4.3 Before proceeding to submit the Plan to the Secretary of State, in our opinion, the responsible approach in terms of delivering local housing needs would be to pause the process to allow the Plan to adapt to, and fully embrace, the emerging NPPF housing policies, which would undoubtedly require more site allocations to be identified. This would future proof the Plan's robustness and longevity, rather than '*rushing it*' through now under rules and guidance that will very soon be replaced, and putting the Council in a position whereby upon adoption (should this version be found 'sound') they would almost certainly need to review the whole Local Plan process again within an extremely short space of time.
- 4.4 Through the landscape-led approach adopted, the concept masterplan work to date has demonstrated that a scheme could be developed that would have limited impact on the landscape, which to a large degree would be mitigated by the disposition and arrangement of generous public open space associated with the new housing. The land does not play any significant role in the visual or physical separation of the settlements of Winchester and Compton Down; nor does it make an important contribution to the setting of Winchester and its identity. It has been shown conceptually that the site can be developed with no adverse visual or landscape character impacts involved.
- 4.5 Furthermore, it is important to continue to stress that the subject site:
- is available now and deliverable in all respects
 - offers a sustainable location for development

- has the potential to make a valuable contribution to the creation of sustainable mixed communities; and
 - provides excellent prospects for housing to be delivered on the land within 5 years.
- 4.6 The masterplan concept would deliver against all three strands of sustainable development:- social; economic; and environmental. Moreover, a residential allocation at the subject site would provide a logical and sustainable extension of the existing settlement and would assist WCC in delivering a robust and deliverable housing strategy.
- 4.7 We therefore strongly advocate, especially in the light of the draft NPPF, that the site's potential selection should be carefully re-considered and would re-iterate our previous offers to open up a dialogue with Officers, through a Planning Performance Agreement (PPA) to explore the development potential of the site. This would enable the progression of the concept masterplan on a '*without prejudice basis*' to be dovetailed with the Local Plan process, which itself should be stalled to allow the Plan to be adapted to satisfy the housing requirements of the emerging new NPPF.
- 4.8 The opportunity is to advance a residential led mixed use scheme that adopts best practice and exemplar sustainability principles and design features, through an integrated multi-disciplinary approach. Recognising the importance of community involvement in the planning system, it is important to stress that the promoter would look to involve the Parish Council at all stages of any future discussions.
- 4.9 We look forward to receiving your feedback.

Appendix 1: - Conceptual Masterplan document (as presented to OBPC)