

Planning Policy Team
Winchester City Council

10 October 2024

SENT BY EMAIL

Dear Sir/Madam

Subject: Winchester Local Plan 2020-2040 – Regulation 19 Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Regulation 19 Winchester Local Plan 2020-2040. The National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act 2023, requires all relevant bodies – including Winchester City Council (WCC) – to seek to further the purposes of the South Downs National Park (SDNP). The National Park purposes are:

- 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

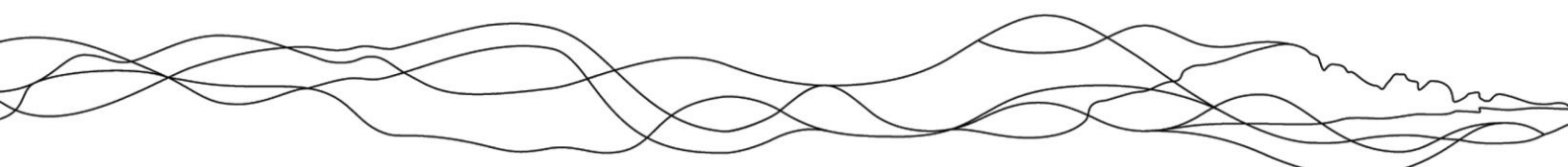
Duty to Cooperate (DtC)

We support WCC's continuing liaison with neighbouring authorities - including the SDNPA - to ensure that cross-boundary strategic priorities are fully addressed. A Statement of Common Ground was signed in August 2024 between the SDNPA and WCC.

Comments on the Regulation 19 Plan

Housing Provision, Table H2, Strategic Policy H1 (p215-218), and Paragraph 14.2 (p387)
As set out in the Statement of Common Ground, there is currently uncertainty over the scale of housing development expected within the SDNP part of Winchester District, due to the early stage of the South Downs Local Plan review. As per the latest South Downs Local Development Scheme, the review is anticipated for Reg 18 in early 2025, Reg 19 in early 2026, Submission in 2026, and Adoption in 2027. At present, WCC estimates that about 350 dwellings (2020-2040) could be delivered in the SDNP part of Winchester District, whereas the SDNPA currently estimates about 250 dwellings. This delivery is subject to satisfactory mitigation for phosphates as the area is affected by nutrient neutrality.

It is agreed that both WCC and the SDNPA will work together to seek to meet the housing needs of the area where this is compatible with the purposes of the National Park. WCC's approach towards providing an 'unmet needs allowance' to help contribute towards unmet needs elsewhere, if possible, is supported by the SDNPA. The authorities agree that part of



this could be used, if necessary given current uncertainty, to resolve potential shortfalls in provision within the SDNP part of Winchester District.

Policy NE4 – Green Infrastructure (p143-145)

We welcome the illustration of strategic blue and green corridors and spaces in Map 9 which includes the SDNP part of Winchester District. This – along with the policy wording and reference to non-motorised travel routes – will ensure that green infrastructure is considered holistically and beyond planning authority area boundaries. We also support Criterion VII given the references to, and protection and support for the uses of, the South Downs Way, Meon Valley Trail, and Watercress Way. This compliments Policy SD20 (Walking, Cycling & Equestrian Routes) in the Adopted South Downs Local Plan.

Policy NE8 - South Downs National Park (p159-160).

We welcome the retention of this policy and its update to include references to conserving and enhancing the intrinsic quality of the South Downs International Dark Sky Reserve. However, to ensure that the policy is effective and consistent with national policy, we request that:

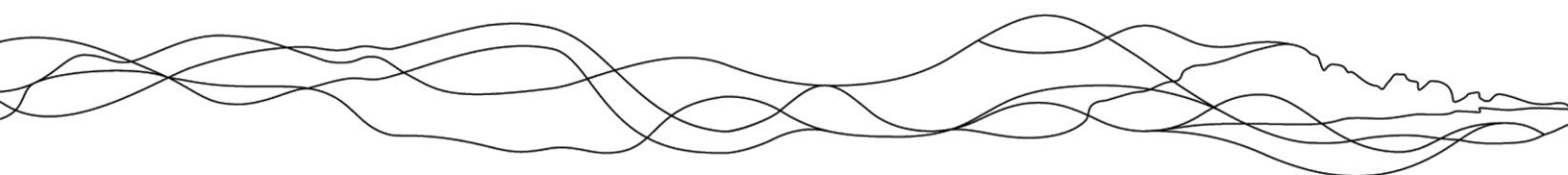
- Paragraph 7.68 and the policy wording is updated in light of the enactment of Section 245 of the Levelling Up & Regeneration Act 2023 and its strengthened wording; and
- The policy wording is amended to replace “*close proximity*” with “*the setting of*” to align with NPPF Paragraph 182.

Policy W5 – Bushfield Camp (p331-336)

The site is in the setting of the SDNP and is an existing strategic allocation in the Winchester Local Plan Part 1 (Joint Core Strategy), under Policy WT3. The principle of development has been established and Policy W5 proposes to carry forward the allocation into the Winchester Local Plan 2040. In comparing the policy wording and supporting text of the adopted and proposed policies, the policy has been updated and strengthened. In terms of the final master-planning and detailed matters of development, this will be addressed through the planning application process. As part of this, the SDNPA is committed to working with WCC to bring this strategic site forward in a way which avoids or minimises any potential adverse impacts of the SDNP as per NPPF Paragraph 182.

Policy BW4 – Land north of Rareridge Lane, Bishops Waltham (p401-404)

As set out in the Statement of Common Ground, the SDNPA has ‘in principle’ concerns 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. The SDNPA is committed to working with WCC and the site promotor to bring this site forward in a way which avoids or minimises any potential adverse impacts of the SDNP as per NPPF Paragraph 182, subject to the site being found sound at Examination. The SDNPA supports the amended policy wording and supporting text which sets out the need for a landscape-led design for the development.



Policy KW2 – Land adjoining the Cart & Horses PH, Kings Worthy (p443-446)

As set out in the Statement of Common Ground, the SDNPA has no “in principle” concerns about this allocation and is content with the detailed wording of the policy.

Other Allocations

We support the criteria in **Policies W10(VII), CC2(VIII), and CC3(II and VIII)** about the relationship with, views from, and provision of landscape buffers to, the SDNP. We request that reference to the SDNP’s setting is included in the above policies, and that similar criteria are included in **Policies W6, W9, BW3, WK1, WK5, WK6, and OT01** – as these are all in the setting of the SDNP - to ensure they are effective and consistent with national policy.

Inset Maps, Site Plans, and Wider Context Plans

We request that the boundary of SDNP is added to the inset maps, site plans and wider context plans for Policies **W5, W6, W9, W10, BW3, BW4, KW2, CC2, CC3, WK1, WK5, WK6, and OT01**. This will assist applicants and case officers in understanding the relationship of the settlement and/or site within the setting of the SDNP.

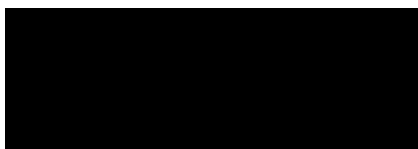
Summary

The SDNPA is supportive of WCC’s open dialogue about cross-boundary strategic matters and considers the Pre-Submission Winchester Local Plan 2040 to be justified. However, to ensure that the emerging local plan is found to be positively prepared, effective, and consistent with national policy, we have raised comments above for consideration and action.

Moreover, we can confirm that the SDNPA is committed to working with WCC on strategic planning matters and bringing sites forward in a way which avoids or minimises any potential adverse impacts of the SDNP as per NPPF Paragraph 182.

We wish you well in the submission and examination of the Winchester Local Plan 2040.

Yours faithfully,



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