

**Representations to
Winchester City Council's
District Local Plan 2020 -
2040 Regulation 19
Consultation**

[Land at Southwick Road,
Wickham](#)

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Client: Croudace Homes

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Southern Planning Practice Ltd

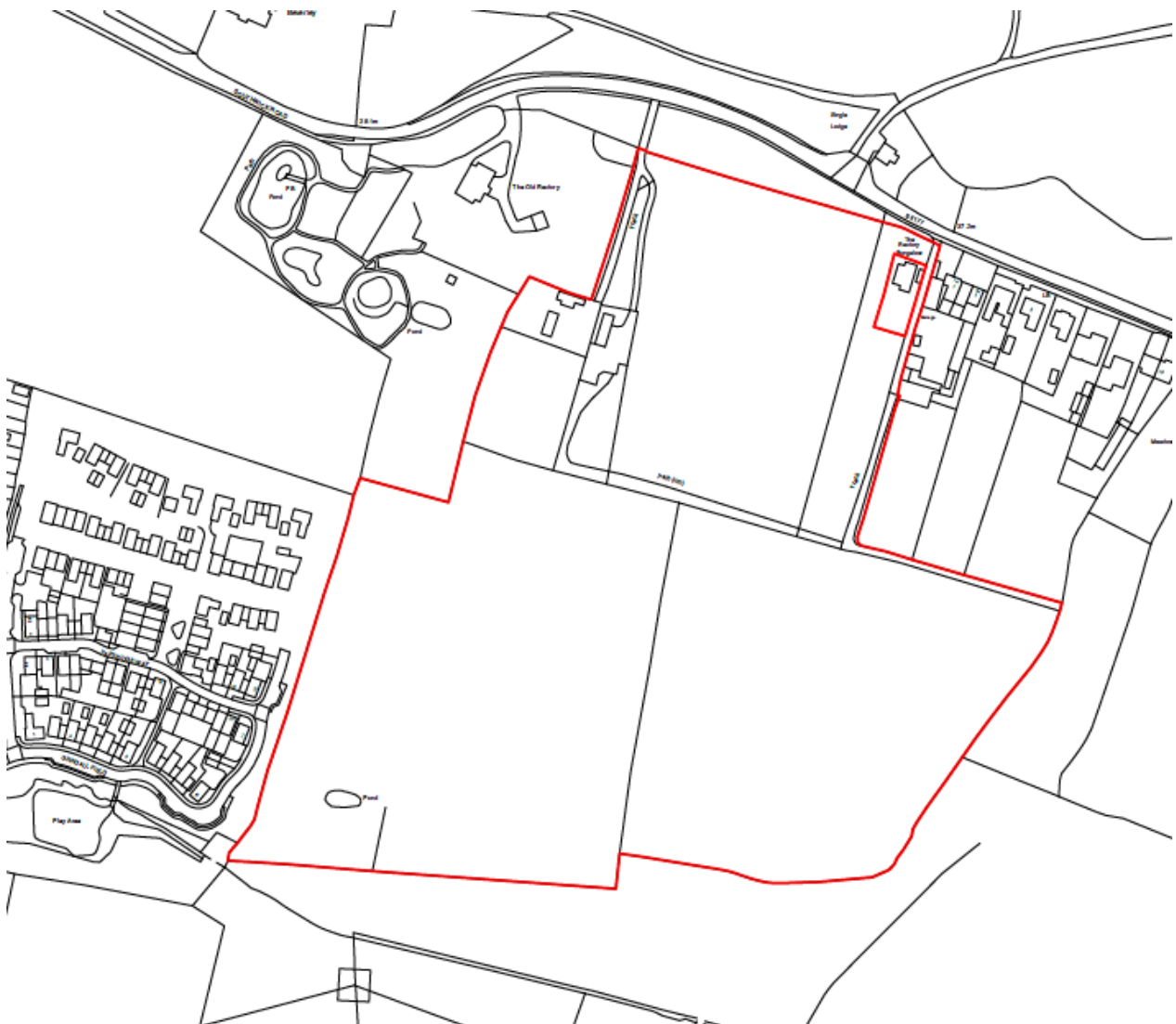
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1.0 Introduction

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of Croudace Homes, who have an interest on the land at Southwick Road, Wickham, in response to the current Winchester District Local Plan 2020-2040 Regulation 19 public consultation. The representations have also been prepared in the context of the proposed changes to the National Planning Policy Framework (NPPF) which have been recently consulted on. The changes to the NPPF seek to significantly boost housing delivery to deliver the Government's commitments to achieve economic growth and build 1.5 million new homes.
- 1.2 The site has been previously promoted to the Council for allocation and it is noted that the western section of the site is allocated in the Regulation 19 Local Plan by Policy WK6 which is strongly supported.
- 1.3 We would like to emphasise that the Local Plan needs to ensure it is planning ambitiously to meet the Government's housing targets and the housing requirement for the district over the plan period and beyond. It is highlighted that the site allocated by Policy WK6, together with the wider land at Southwick Road would provide an immediate, important contribution to Winchester City Council's housing need over the plan period. The opportunity presented by the site is discussed throughout these representations.
- 1.4 The site is located immediately to the east of Grindall Field in Wykeham Vale, a recent housing development built by Croudace Homes and to the south of Southwick Road in Wickham, one of the larger rural settlements in the district. The site comprises areas of grazed land, maintained grassland and an area used for growing produce. Section 4 of these representations provides further details on the wider site and its suitability for allocation for residential development in the emerging Local Plan.
- 1.5 Croudace Homes create homes of the highest quality by paying attention to detail in the design of each property and also to the layout of their developments to respond to local characteristics and provide high quality places built to support future generations. For the last 12 years Croudace Homes have been awarded the prestigious Home Builders Federation five star award for customer satisfaction.
- 1.6 These representations will respond to the Local Plan Regulation 19 Consultation and will also present the opportunity which the land at Southwick Road, Wickham provides.

- 1.7 It is confirmed that in addition to the land proposed to be allocated by Policy WK6, the whole site is available, suitable and achievable and therefore deliverable. Allocation of this wider site would further help to meet Winchester’s housing need in a sustainable way whilst also providing benefits to the local community and the District’s economy.
- 1.8 The following plan details the extent of the site.



2.0 [Response to Vision and Objections and Spatial Strategy](#)

- 2.1 The following provides a response to the two strategic policies, namely Spatial Policy SPI and Spatial Policy SP2, set out in the Regulation 19 Local Plan which relate to the visions and objectives and spatial strategy of the plan.

Spatial Policy SPI - Vision and Objectives

- 2.2 Policy SPI confirms that the Council is committed to the delivery of the vision and objectives of the Plan and will engage proactively with a range of partners to jointly find solutions to achieve high quality sustainable and inclusive development.
- 2.3 We largely support the Vision for Winchester District over the plan period. Whilst we acknowledge that it sets out that the market towns and rural settlements will remain attractive settlements to support evolving communities and the economy, we encourage the Council to allow such settlements which are sustainable to deliver appropriate growth as opposed to 'modest' growth which suggests growth in these sustainable settlements will be limited and not ambitious, as required by the National Planning Policy Framework (NPPF).
- 2.4 The objectives set out to deliver the vision are supported. In particular, the objective to provide homes for all is key to ensure that the Local Plan delivers high quality new housing to meet identified local needs.

Spatial Policy SP2 – Spatial Strategy and Development Principles

- 2.5 Strategic Policy SP2 sets out the spatial strategy to deliver new housing, economic growth and diversification. The strategy identifies three spatial areas for which it sets out a development strategy for each. The two key areas identified for growth in the plan period are Winchester Town and the South Hampshire Urban Areas, each area is identified to make provision for 5,640 homes and 5,650 homes respectively. The third spatial area, Market Towns and Rural Area, is identified to make provision for 3,850 new homes.

- 2.6 The site falls within the Market Towns and Rural Area. Whilst we are supportive that this area will make provision for some housing, as this spatial area covers a large physical area of the district, we believe that the Council should be more ambitious in its housing numbers to fulfil both the housing need of the district and any unmet need arising from neighbouring local authorities, particularly authorities within the Partnership for South Hampshire (PfSH) area.
- 2.7 We support the development strategy for Market Towns and the Rural Area which sets out that development will be provided in the most accessible and sustainable locations, to support the vitality and viability of communities. However, it is considered that the housing provision does not fulfil the district's housing requirement or fully accommodate the unmet needs arising from neighbouring authorities. Therefore, whilst the allocation of the westernmost section of the land at Southwick Road is supported, it is considered that Wickham is a sustainable settlement which is geographically well located in the PfSH area to accommodate unmet need arising from neighbouring authorities and which is capable of accommodating further development over the plan period. In the light of this we would encourage the Council to make provision for further homes in the Market Towns and the Rural Area by considering allocating further land at Southwick Road to provide a comprehensive development which would further promote the vitality and viability of Wickham, and maintain its rural character and individual settlement identity through a comprehensive landscaping scheme as required by Policy SP2.
- 2.8 Overall, we support the Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the market towns and rural areas of the district to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect the environment. However, we encourage the Council to review the housing provision for this area and increase it to ensure it is in accordance with the Government's ambitious housing targets over the next five years and beyond. Section 3 of these representations further explores the housing provision for the district over the plan period.

3.0 [Response to Housing Provision](#)

3.1 The following section responds to the 'Homes for all' part of the Local Plan which seeks to determine the housing provision and then confirm how this will be delivered over the plan period.

Strategic policy H1 – Housing Provision

3.2 Strategic Policy H1 of the Regulation 19 Local Plan sets out the housing provision for the plan period to be circa 15,115 dwellings. It confirms that this housing provision will be split between the three spatial areas as follows:

- Winchester Town – circa 5,640 dwellings
- South Hampshire Urban Area – circa 5,650 dwellings
- Market Towns and Rural Area – circa 3,825 dwellings

3.3 Table H1 indicates that the housing requirement, as calculated using the standard method, is 13,565 homes over the plan period. It is disappointing that the Council have not set out that this figure should be a minimum number of homes to be delivered over the plan period, as required by the current standard method set out in the NPPF. We therefore encourage the Council to indicate this figure to be the minimum and to allocate a sufficient number and variety of sites to ensure that the Local Plan supports the Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF.

3.4 As per paragraph 61 of NPPF, the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. Further, as per the Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205, the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Winchester district.

3.5 Indeed, in order for the Local Plan Review to meet the ‘positively prepared’ test of soundness as required by paragraph 35 a) of the NPPF, the Local Plan review must:

“provide (ing) 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”.

3.6 Further, it is pertinent to note that the proposed reforms to the NPPF, the consultation of which ended on 24 September 2024, proposes to restore the standard method for assessing housing need to be mandatory and a new standard method to be introduced. The revised standard method is intended to support the Government’s ambition to deliver 1.5 million homes over the next five years. The proposed revised standard method seeks four principles of reform, these are:

- To support the Government’s **ambition** to deliver 1.5 million new homes over the next five years;
- provide greater **certainty** to the sector through more stable and predictable housing numbers;
- achieve a more balanced **distribution** of homes across the country, by directing homes to where they are most needed and least affordable, and ensure that all areas contribute to meeting the country’s housing needs, rather than radically undershooting local ambition in some areas of the country; and
- be **straightforward** to understand and apply – so that the method can be easily replicated, be updated in line with the most recent publicly available data, and speed up plan making.

3.7 The new standard method is proposed to use a baseline set at a percentage of existing housing stock levels, top up this baseline using a stronger affordability multiplier and remove arbitrary caps and additions so that the approach is driven by an objective assessment of need. It is understood that the new standard method will increase the housing requirement by at least 200 homes per annum.

3.8 In the light of the proposed new standard method, the current housing requirement proposed in the Regulation 19 Local Plan is not ambitious enough to achieve the Government’s housing targets. It is therefore considered that the Council should look to increase the housing requirement to

ensure that it is appropriately and sufficiently planning for growth, in accordance with the Government's housing targets.

3.9 Table H2 sets out that in addition to the housing requirement calculated using the standard method, provision has been made for 1,900 homes to meet the unmet need arising from neighbouring authorities. The housing provision for unmet need will be discussed further below.

3.10 Paragraph 9.18 confirms that *'There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2020), or which are allocated by the existing Local Plan but have not yet been developed.'* Together with the housing requirement calculated under the current standard method, the housing provision over the plan period is confirmed to be 15,465 homes. Of this figure it is confirmed that 3,170 dwellings have been completed from 2020-2023 since the start of the plan period. This equates to approximately 20.5% of the overall housing provision. In addition, 6,780 dwellings (43.8%) of the housing provision are outstanding planning permissions and 745 dwellings (4.81%) are other commitments from previous Local Plans. Therefore, only 2,875 (18.6%) are new proposed allocations in the Regulation 19 Local Plan and 1,895 (12%) dwellings have been indicated as windfall development. In our view, it is not considered that the plan has been positively prepared and will therefore not meet the tests of soundness with only 18.6% of the housing provision over the plan period coming from new allocations. We therefore urge the Council to look at allocate further sites to boost and bolster the housing supply throughout the plan period.

3.11 As demonstrated by the figures above, it is clear there is an over reliance on previously allocated sites, some of which have been built out and others which are complex brownfield sites which have not come forward in previous plan periods (for example Station Approach, the Central Winchester Regeneration Area formerly Silver Hill and Clayfield Park). Therefore, the deliverability of several of the allocated sites proposed to be carried over from the current Local Plan is questioned. If a site cannot be demonstrated as available, suitable and achievable, it should not be included as an allocation, unless an explanation can be provided as to why it has not been delivered to date and why it can now be considered deliverable. Without this justification, these sites should be deleted.

3.12 Further, there are three Neighbourhood Plan designated areas identified by policies HUI, DENI and NA3. Together these three areas are proposed to provide 220 homes to contribute to the housing requirement of the District. It is proposed that 100 of these homes will be provided in

Denmead, 100 in Alresford and 20 to be provided in Hursley. The Denmead Neighbourhood Plan is currently being reviewed and a recent assessment of proposed sites has been undertaken, this has identified four suitable sites however these only equate to 27 homes and it is therefore questioned where the remaining 73 homes are to be found. The Alresford Neighbourhood Plan is at an early stage of preparation and the Hursley Neighbourhood Plan is at a very early stage, therefore it is questioned whether it is realistic to rely on all of these areas delivering the proposed 220 homes over the plan period. We would suggest that the Council review this to ensure that they are confident these homes will come forward through the respective Neighbourhood Plans in the plan period, and if not, further sites should be allocated elsewhere to ensure the required homes are delivered.

- 3.13 In addition to meeting their own housing needs, Winchester City Council needs to plan to accommodate some of the unmet need arising from the neighbouring authorities as required by the PfSH Statement of Common Ground. Paragraph 24 of the NPPF states that:

“Local Planning Authorities... are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”

- 3.14 Paragraph 26 of the NPPF goes on to require that:

“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere”.

- 3.15 It is noted that provision is made for 1,900 homes in the Regulation 19 Plan which is welcomed as the Regulation 18 Local Plan Consultation did not make provision for any unmet housing need to be accommodated. However, in the light of the new Government’s ambitious housing targets, it is considered that the unmet need from neighbouring authorities could increase, for example Southampton’s already unachievable housing need may increase by a further 15%, and therefore, in accordance with the PfSH Statement of Common Ground, further provision should be made to accommodate the resultant unmet need to ensure the plan is effective and meets the tests of soundness.

3.16 Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of these sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council needs to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement As set out in Section 4 of these representations, the wider site at land at Southwick Road provides a key opportunity to allocate further land in a highly accessible, sustainable location to deliver the required housing Winchester needs over the plan period.

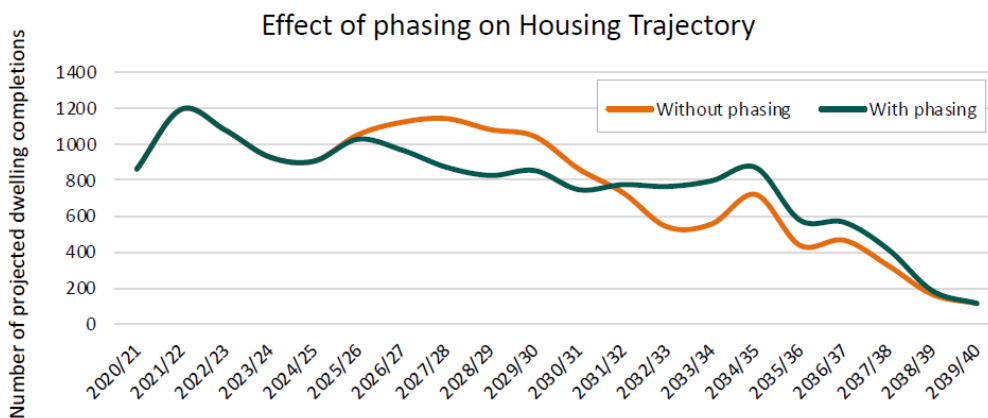
Strategic Policy H2

3.17 Strategic Policy H2 sets out that phasing will be applied to new greenfield housing sites allocated by the Local 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. 12 sites are identified to 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'*. These sites contribute a total of 655 dwellings to the housing requirement in the plan period. It is unclear why the phasing is proposed, however, it is believed it could be to delay the housing delivery trajectory from falling below the annual housing target until later in the plan period to ensure that a robust housing land supply is maintained and speculative applications are not made.

3.18 Whilst it is appreciated that the Council may be seeking to take a brownfield first approach with the phasing, due to there being several complex brownfield sites (particularly within the city centre), it is considered that the proposed phasing could prevent much needed homes coming forward in the early years of the plan period.

3.19 Paragraph 9.24 of the Regulation 19 Local Plan Consultation states that *'Brownfield sites, which often have a long lead in time in terms of delivery have been specifically phased towards the earlier parts of the Plan period...'*. This rationale is not understood nor supported. Such a strategy could result in the under delivery of much needed homes in the early years of the plan period, which could result in speculative applications on unallocated and potentially unsustainable sites within the District.

- 3.20 The 12 sites which are prevented from being permitted for development until after April 2030, are all considered to be unconstrained, sustainable sites in accessible locations which are well-related to existing settlements. These would provide a positive and fundamental contribution towards the local housing need. It is therefore considered that the proposed phasing is overcautious, not justified and inconsistent with the Government’s aim to deliver 1.5 million homes in the next 5 years or significantly boosting the supply of homes as required by Paragraph 60 of the NPPF. Further, as of 15 July 2024, 1,609 households were registered on Winchester City Council’s Housing Register with the average wait time being 1 year and 5 months. As such, as currently drafted, the Regulation 19 Local Plan does not meet the current of future housing requirement and therefore fails tests of soundness as set out in Paragraph 35 of the NPPF.
- 3.21 To the author’s knowledge, there have been no recently adopted Local Plans which apply a phasing approach which prevents sustainable development coming forward until later in the plan period. This is believed to be because such an approach would be found unsound at examination.
- 3.22 The ‘Effect of phasing on Housing Trajectory’ graph on page 218 of the Regulation 19 Local Plan, extracted below, details that without the proposed phasing there will be a significant boost in the delivery of housing from 2025/26 to 2031/32. This increased level of delivery is wholly in accordance with the Government’s aim to deliver 1.5 million homes in the next 5 years and therefore this alone demonstrates why the proposed phasing set out in Strategic Policy H2 should not be allowed or found sound once the Local Plan is submitted for examination.



‘Effect of phasing on Housing Trajectory’ graph - page 218 of Regulation 19 Local Plan

- 3.23 Further, it is highlighted that the Land at Southwick Road/School Road, allocated by Policy WK6, has the proposed suppressive phasing clause within the policy which is unjustified. Croudace Homes are committed to seeking to support and help achieve the Government's aim to increase housing delivery over the next 5 years and therefore emphasise that the proposed allocation could come forward in the near future which would further boost Winchester's housing supply in the short term. As set out in Section 4, there is an additional opportunity to allocate further land to the north and east of the proposed allocation to ensure the housing trajectory does not drop off after 2031/32.
- 3.24 As highlighted by Paragraph 70 of the NPPF, '*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly*'. Additionally, the PPG states that "*strategic policy-makers should ensure there is not continued delay in meeting identified development needs*". Therefore, this must be considered in terms of how achievable, available, suitable, and therefore deliverable sites - including greenfield sites - can be achieved at any point of the Plan period, and should not be prevented from coming forward until brownfield sites have been delivered.
- 3.25 In the light of the above comments, we urge the Council to remove the proposed phasing set out in Strategic Policy H2. Together with the removal of the proposed phasing and restriction of 12 greenfield sites coming forward before 2030, we suggest the Council seeks to allocate a range of further sites to boost and bolster the housing land supply throughout the plan period.

Strategic Policy H3

3.26 Strategic Policy H3 sets out the housing proposed for each spatial area as follows:

Spatial Area	Settlements / Area	Housing Provision	New Allocations Proposed
Winchester Town		5,640	1,410
	Winchester		
South Hampshire Urban Areas		5,650	500
	Newlands (West of Waterlooville)		
	Whiteley		
	Botley		
Market Towns and Rural Area		3,825	965
	Market Towns:	1,375	200
	Bishops Waltham New Alresford		
	Larger Rural Settlements:	1,570	610
	Colden Common Denmead Kings Worthy Swanmore Wickham		
	Intermediate Rural Settlements:	360	155
	Hursley Otterbourne South Wonston Sutton Scotney Waltham Chase		
	Remaining Rural Area	520	0
Winchester District		15, 115	2,875

3.27 It is noted that Wickham is included in the 'Large Rural Settlements' spatial area and only just over a third of the housing provision for the area is coming from new proposed housing allocations. The housing sources for Wickham are set out on Page 453 of the Regulation 19 Local Plan and confirm that in fact only 100 homes of the 356 provision in Wickham are from new allocations. It is highlighted that Wickham is a sustainable settlement with many facilities and services with good connections to larger settlements and therefore it has capacity to take further growth.

3.28 We fully support the allocation of the land at Southwick Road for 60 homes (indicative figure) in the Regulation 19 Local Plan. However, the inclusion of the land known as Ravenswood (Policy KNI) for 200 homes is questioned as to whether such provision should be counted in the housing numbers for the Local Plan. An outline planning application was submitted for the community led proposal to develop 200 new homes including affordable housing, with associated access,

landscaping, parking and open space in 2018. The planning application is still pending a decision due to the requirement for a Section 106 agreement to be signed. As set out in paragraph 3.10 above, if there are concerns about the deliverability of sites, they should not be included as housing allocations.

Policy H6 – Affordable Housing

- 3.29 Policy H6 seek to delivery the affordable homes required over the plan period and sets out that the provision of affordable housing will be required for at least 40% of all new dwellings, on greenfield sites, subject to a number of criteria. We are supportive of the policy aspirations to provide an appropriate level of affordable housing, as Winchester District has one of the highest affordability ratios in the country outside London.
- 3.30 It is confirmed that Croudace Homes always strive to deliver a policy compliant level of affordable housing to ensure that their developments deliver homes for all.

4.0 [Response to Policy WK6](#)

- 4.1 Policy WK6 allocates the westernmost section of the site which Croudace Homes has an interest in for 60 dwellings (indicative) which is strongly supported.
- 4.2 The following section provides comments on the proposed wording of Policy WK6.
- 4.3 The policy states that ‘The development is phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030.’ As discussed above, the proposed phasing of the development is not considered to be in accordance with the current NPPF or the Government’s aspirations. As such, this requirement should be removed from the policy and all other policies where this phasing restriction is suggested to ensure that the Local Plan is found sound. Particularly given the over reliance on complex brownfield sites, in order to maintain a robust housing land supply and deliver the required homes, sustainable sites should not be prevented from coming forward in the early years of the plan.
- 4.4 Requirements of the access to the proposed development are set out in the policy, all of these requirements are considered to be acceptable and in accordance with Croudace Homes’ aspirations to create high quality developments which encourage the use of sustainable transport and promote healthy active lifestyles.
- 4.5 In addition to the access requirements, Policy WK6 sets out eight criteria for environmental requirements. All of these criteria have been reviewed and as previously mentioned several technical surveys and reports have been undertaken and it is believed that all of these policy requirements are achievable.
- 4.6 The two criteria relating to other infrastructure are duly noted and the development will of course make the required Community Infrastructure Levy payment and if there is a need to provide a financial contribution to further infrastructure, this will be discussed during the consideration of a future planning application.

5.0 Land at Southwick Road – The Opportunity

5.1 The site is located to the south east of Wickham which is located approximately 5km to the north of Fareham. The whole site extends to approximately 8.87ha. The westernmost section which is proposed to be allocated by Policy WK6, includes land extending to approximately 3.3ha. Therefore, there is a further opportunity for an additional area of land to come forward which has the capacity to provide circa 100 homes.

5.2 Several technical reports and surveys have been undertaken to establish the site's key constraints and opportunities. The findings of the technical investigations have confirmed that the site is largely unconstrained and it presents a significant opportunity to provide a logical extension to the existing built up area to assist in meeting the expectations and aspirations of the local community as well as helping Winchester City Council meet its ongoing housing requirements, and the unmet need arising from the wider PfSH area.

5.3 The aspiration is to develop the whole site for approximately 150 – 175 homes at a density appropriate to the existing built form and the surrounding area. The site could be phased so that the first 60 homes, as proposed to be allocated by Policy WK6, could come forward in the first 5 years of the plan period, with the wider site coming forward in following 5-10 years of the plan period. It is considered that the site could provide the mandatory 10%, or more, BNG on site.

5.4 The extension to Wykeham Vale would create a high quality sustainable development which would:

- Provide a mix of 150-175 high quality homes at a density of 30-35dph;
- Provide a policy compliant level of affordable housing to meet the community's needs;
- Respect and enhance the surrounding countryside and existing built form;
- Provide new areas of public open space, to include natural play provision, which would be accessible for both future and existing residents in Wickham;
- Utilise the existing access from Grindall Field and an emergency access from Southwick Road;
- Retain key trees and also plant further trees along streets and within areas of public open space to enhance public amenity and improve carbon capture;

- Provide new areas of planting including grassland, trees and wildflower meadows together with other ecological enhancements to deliver meaningful Biodiversity Net Gain;
- Allow the creation of new footpaths to connect the new homes with the existing community and the services and facilities in Wickham;
- Provide a 20m buffer zone to provide offsetting of the development from the adjacent woodland;
- Ensure that a sustainable urban drainage system is well designed to ensure that there is no additional surface run off generated from the development of the site.

5.5 As expressed, there is a need to boost the housing provision in line with the Government's aspirations, and therefore we urge the Council to look at the clear opportunity presented by the wider site at land at Southwick Road, Wickham.

5.6 The land at Southwick Road presents a rare opportunity for an unconstrained site in a highly sustainable countryside location to be developed to deliver much needed high-quality homes for people within the District.

5.7 In accordance with the definition of 'deliverable' within the NPPF (2023), the site is available for development now, is in a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following the site's allocation.

6.0 Conclusion

- 6.1 We strongly support the allocation of the land at Southwick Road/School Road under Policy WK6 and as highlighted in these representations, encourage the Council to allocate the wider site for further residential development.
- 6.2 Paragraph 16 b) of the NPPF sets out that plans should be positively prepared in a way that is aspirational but deliverable.
- 6.3 It is considered that as currently drafted, the emerging Local Plan Review is not positively prepared in accordance with paragraph 35 a) of the NPPF and is therefore unlikely to assist the Government in its objective to significantly boost the supply of new homes. The draft Local Plan does not appear to have fully assessed the existing allocations to understand why they have not been delivered to date, but simply rolled them forward, and also included sites which have already been completed. Further, the capacity of the proposed site allocations do not appear to have taken into account the mandatory requirement for BNG and this impact on potential housing numbers.
- 6.4 To assist in remedying this deficiency in the housing land supply, it is considered that the Council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply over the plan period.. In this respect, we would like to highlight the suitability of the wider land at Southwick Road which is suitable to come forward in the plan period and would provide a key contribution to the small-medium sites which would be able to deliver in the early years of the plan period.
- 6.5 The whole site which comprises the land at Southwick Road, Wickham is best placed to contribute towards meeting housing need in a “*most accessible and sustainable*” location, as well as supporting “*the vitality and viability of communities, and [maintaining] their rural character and individual settlement identity*”, as sought by Spatial Policy SP2. The allocation of the westernmost section of the site by Policy WK6 is strongly supported and it is highlighted that that wider site is also a sustainable site that will meet Wickham’s current and future housing need as well as potentially contributing to the wider unmet need arising from neighbouring authorities.
- 6.6 In accordance with the definition of ‘deliverable’ within the NPPF (2023), the land at Southwick Road is available for development now, it is a suitable and sustainable location for future residential

development and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.

6.7 In summary, the land at Southwick Road would provide many benefits to Wickham and the surrounding Winchester District, including:

- Provision of homes in a highly accessible location which will encourage healthy active lifestyles through walking and cycling and reduce the reliance on a private car;
- Contribution of a mix of size, type and tenure of home, including much needed affordable housing, to Winchester's housing land supply;
- Contribution of an additional working population to the area;
- Direct and indirect employment through the provision of new homes.

6.8 In the light of the above and the details provided in these representations, it is requested that the Council review their allocated sites together with their housing requirement and look to allocate additional small and medium sites, such as the additional land at Southwick Road to meet Winchester's housing need over the plan period and beyond.

6.9 Croudace Homes support the allocation of the land at Southwick Road site for approximately 60 homes whilst confirming the wider site is also available for further homes to meet Winchester's housing need and welcome the opportunity to continue working with the Council, community and other stakeholders to deliver a high quality sustainable development in which people aspire to live in the early years of the plan period.

6.10 We trust the information contained within these representations is sufficient, however should you require any further information please do contact us.