



# **Winchester Local Plan Regulation 19 Publication Plan Consultation**

Lanham Lane,  
Winchester  
Kler Group

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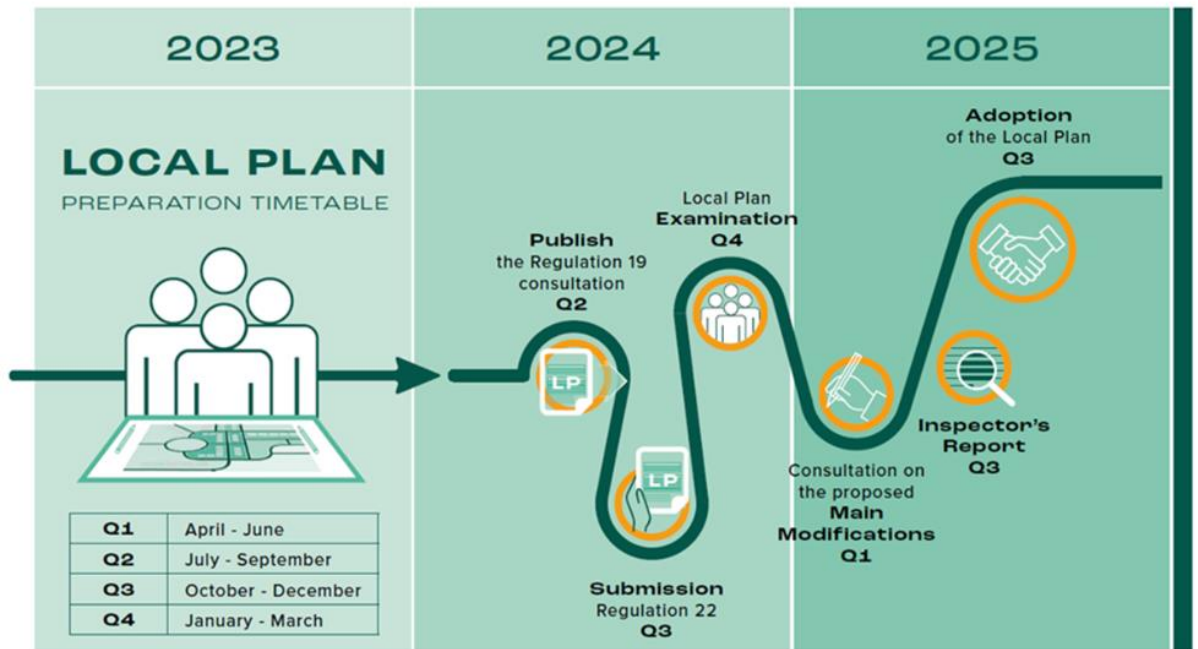
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**Prepared by:**

Stuart Crossen  
BA (Hons)  
PgCert  
PgDip  
MA  
MRTPI

# 1. Introduction

- 1.1 Cerda Planning Ltd has been instructed by Kler Group Limited (KGL) to make representations to the Winchester District Regulation 19 Publication Plan Consultation 2024.
- 1.2 KGL welcome the production of the Winchester District Local Plan and wish to support the Council in its preparation. Modifications will be required to the plan to address certain issues, and particularly that more land needs to be identified for residential development to ensure that:
- Enough flexibility has been built into the housing land supply to safeguard against the issues identified with the current supply and emerging effects of the changes proposed by the Proposed reforms to the National Planning Policy Framework and to the Written Ministerial Statement ‘Building the homes we need’ on assessing housing need;
  - Enough affordable housing will be delivered to address identified needs;
  - Homes are provided as soon as possible; and,
  - A diverse mix of housing can be provided to address the specific needs of the Borough.
- 1.3 The Local Plan review provides a vision and framework for Winchester for the period to 2040, addressing housing needs and other economic, social, and environmental priorities, assess the future levels of need, and an appropriate basis, for new homes (including market, affordable, and specialist housing), employment land, and infrastructure provision over that period and assess the future levels of need, and an appropriate basis, for new homes (including market, affordable, and specialist housing), employment land, and infrastructure provision over that period.
- 1.4 The current timeline for the plan review is as follows:



Local Plan timetable

1.5 Before submitting a local plan to the Secretary of State under section 20<sup>1</sup> of the Act, the local planning authority must

- (a) make a copy of each of the proposed submission documents and a statement of the representation's procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

1.6 The next stage in the process following this consultation will be to submit the document and information to the Secretary of State.

<sup>1</sup> Planning and Compulsory Purchase Act 2004

## 2. Omission Site

- 2.1 Land at Lanham Lane is an omission site which, as set out later in these representations, is put forward to assist in rectifying the significant soundness issues identified in relation to the draft plan.
- 2.2 Kler Group Limited has been promoting the site since 2020, with the intention of assisting the Council in delivering housing in the emerging plan period so as to meet strategic requirements.
- 2.3 In this regard submissions were made to the call for sites in 2020 and 2021. In addition, a Vision Document was prepared and submitted to the Council in 2022 setting out the planning background, the site and its context, constraints and opportunities and the Kler Group Limited proposal. This document included important baseline and assessment information, and is included as part of this pre application enquiry upon which the Council is requested to have regard in judging the merits of the Kler Group Limited proposals.
- 2.4 Subsequently, the Council issued its Regulation 18 Local Plan review, which Kler Group Limited reviewed in full and engaged in the plan making exercise in submitting detailed representations.
- 2.5 The Development Plan for Winchester comprises the Local Plan Part 1 (adopted 2013) and the Winchester District Local Plan Part 2 (adopted 2017).
- 2.6 Policy DS1 sets out the development strategy and distribution of development for the district. This adopts a pattern of balanced dispersal, with new development focused within the urban areas of Winchester Town and the South Hampshire area. The market towns and rural area also make a smaller ancillary provision for new development.
- 2.7 It is set out that Winchester Town will accommodate 4000 new homes during the plan period. The development and redevelopment of existing premises and sites within and adjoining the defined built-up area of Winchester will deliver approximately 2000 new homes. A further 2000 homes will be developed at the strategic allocation located to the north of Winchester at Barton Farm. The South Hampshire Urban Areas will make the provision of two new neighbourhoods to provide approximately 6000 new homes. The market towns and rural areas will make provision for approximately 2500 new homes

during the plan period. The market towns and rural area will make provision for approximately 2,500 new homes and development at such locations should seek to promote the vitality and viability of communities and maintain their rural character and individual settlement identity.

- 2.8 The Core Strategy also includes a series of development management policies concerned with biodiversity (Policy CP16), heritage and landscape character (Policy CP20) and development in the countryside (Policy MTRA4).
- 2.9 The site is located at the western urban edge of Weeke that forms the western residential suburbs of Winchester.
- 2.10 The site extends to approximately 9.5ha (23.4 acres), comprising of an irregular shaped arable field. The site is bound to the north by Deans Lane, to the east and southeast by residential development and open countryside to the north and west.
- 2.11 In relation to settlement and built form, the site shares an immediate relationship with the western urban fringe of Winchester. Beyond the urban edge, built form is limited to a row of properties along Westview Road located west of the site.
- 2.12 In terms of infrastructure the site sits south of the B3049 and B3420. The closest bus stop is presently located approximately 271m from the site and Winchester railway station is located approximately 1.9 miles east of the site.
- 2.13 The site is not presently located within any land designations and is considered to be open countryside.
- 2.14 There are no statutory heritage assets within or directly adjoining the sites boundary. The closest heritage asset to the site is Dean Prior, a Grade II Listed Building, however it is considered that due to existing built form and the distance from the site, this proposal would not impact the Listed Building.

#### Ecology

- 2.15 The ecological appraisal has been informed by a desktop study and ecological walkover of the site. In terms of ecological designations, the site is located outside but adjacent to Weeke Down Covered Reservoir Site of Importance for Nature Conservation (SINC). The

SINC would not be directly impacted by development or indirectly through construction activities.

- 2.16 River Itchen Special Area of Conservation (SAC) is located approximately 3km east of the site. Any development proposals put forward will require mitigation to achieve nutrient neutrality.
- 2.17 Residential development at the site is unlikely to significantly impact upon any statutory ecological designations in the local area. Subject to a sensitive scheme design and buffering on site which will incorporate semi-natural habitats and potentially include SuDs.
- 2.18 The on-site habitats are unlikely to pose a constraint to development, subject to the retention of existing boundary vegetation wherever practicable. Consideration will need to be given to opportunities to achieve biodiversity net gain on site.
- 2.19 The site at present is primarily comprised of arable land which is of limited ecological interest which provides limited opportunity for protected or notable faunal species. The site will provide opportunities for new hedgerow creation and new calcareous grassland which will complement the SINC and encourage biodiversity net gain at the site.
- 2.20 Overall, subject to a sensitive scheme design, there are no over-riding ecological constraints to development of the site. On the contrary there are numerous opportunities for ecological enhancements at the site.

#### Arboriculture

- 2.21 The site is not within a Conservation Area; accordingly, the amenity value of the trees is not elevated to preserving or enhancing any unique or distinctive interest linked to the setting.
- 2.22 The site's principal trees comprise of mature Sycamore with Common Dogwood, Blackthorn and Yew which commensurate to BS5837:2012 category A which occur along the eastern boundary of the site. The mature Sycamore belt provides a high degree of maturity and structure within the site alongside visual separation between existing

residential development to the east and is a central and connecting component to the site's green infrastructure network.

- 2.23 The character of Lanham Lane benefits from a dense unbroken hedgerow, comprised of Blackthorn with Common Dogwood and Hawthorn. The alignment of the hedgerow appears to correspond to Lanham Lane per the first edition Ordnance Survey series for the site. Development enabled intervention to manage scrub encroachment at its western extent would not harm its outward appearance or contribution.
- 2.24 The woodland belt will be retained within any future development proposal except where removal is necessary to gain access to the site. Such removal will occur where there is opportunity to exploit weaker components of existing tree belt to provide primary site access.
- 2.25 At the northeastern corner of the site, natural hedgerow degradation presents an opportunity for canopy cover and boundary reinforcement. Opportunities to introduce species with seasonal interest at this location would contribute to public amenity and enhance structure of the default canopy type at a point of formal public access to the site.
- 2.26 Offsite collection of mature Horse Chestnut, Corsican Pine, and understory of Common Dogwood with Blackthorn are shown adjacent to the north-western boundary. They provide readily distinguishable structure and maturity to the boundary.

#### Landscape

- 2.27 The assessment considers the landscape and visual baseline setting of the site, the location of the site and associated value, and the visual setting of the site through the consideration of a series of views.
- 2.28 Existing tree belts to the boundaries and well vegetated corridors of Dean Lane and Lanham Lane restricting views from the localised landscape and adjacent road corridors, providing a high degree of containment to the site. Opportunities exist for the boundaries to be retained and further enhanced to ensure the character of the green lanes is maintained and enhancements to the green infrastructure network are created. A buffer along part of the north, eastern and western boundary will enhance the visual amenity of the site and encourage biodiversity.



- 2.29 The eastern boundary interfaces with the adjoining built up area, with residential development characterising the immediate setting of the site to the immediate east and influences the site itself.
- 2.30 The southern portion of the site is located on high ground which will remain open, and opportunities exist to create recreational, landscape and ecological enhancements. Links to the PROW network can be improved and opportunities for community facilities such as children's play space, ecological nature trail or picnic area to be considered as part of the development.
- 2.31 An enhanced pedestrian route around the site will be implemented, encouraging active lifestyles and access to meaningful public open space.

#### Heritage

- 2.32 A Built Heritage and Archaeology Constraints and Opportunities Assessment has been prepared by RPS. The assessment considers the extent and nature of known heritage assets within the Study Site and surrounding area, providing relevant and up to date evidence to support the promotion of the Study Site for residential allocation.
- 2.33 There are no designated heritage assets within the Site or its immediate vicinity and is not located within a conservation area as designated by the District of Winchester.
- 2.34 A Romano-British farmstead and associated field system on Teg Down, designated as a Scheduled Monuments (NHLE ref.1008748) lies c.750m to the southeast of the Study Site. The Study Site forms no part of the experience of this Scheduled Monument and is not considered to form part of its setting. The Study Site makes no contribution to the significance of this designated archaeological asset.
- 2.35 Any archaeological evidence present within the Study Site is most likely to be of low (local) significance only.
- 2.36 Any future planning application would need to be supported by a formal Heritage Assessment, aerial photographic assessment and a geophysical survey. These surveys would inform a subsequent targeted intrusive trial trenching scheme. The residual harm

from the development of the Study Site to non-designated heritage assets, such as archaeological features within the Study Site, will be considered in accordance with the relevant tests of the NPPF within the wider planning balance. A heritage-led approach to the scheme will demonstrate that the sensitivities of the Study Site have been understood from the outset and strongly informed the emerging scheme. Mitigation in this instance will comprise suitable archaeological investigation, publication and public engagement measures.

### Transport

- 2.37 The site is located to the west of Winchester and has a frontage onto Lanham Lane. Lanham Lane runs from south to northeast along the eastern site boundary. At the northeastern corner the site, Lanham Lane joins Dean Lane at a priority-controlled crossroads with Dean Lane and Slaters Lane. At the approximate centre of the eastern site boundary, Lanham Lane forms the major arm of a priority-controlled T-Junction with Teg Down Meads. To the southwest of this junction Lanham Lane extends as carriageway for approximately 100m before downgrading to a Bridleway.
- 2.38 The site is well located for travel by sustainable modes, with schools, employment, recreation facilities and key amenities all located within 2km pedestrian catchment from the site access. At the southern site boundary Lanham Lane is a Bridleway, and there is scope to provide a pedestrian and cycle connection to the Public Rights of Way network in this location.
- 2.39 Access to the site would be taken via an extension of Teg Down Meads into the site at its junction with Lanham Lane, and the creation of a priority crossroads with junction table where Lanham Lane forms the minor arms. Both the junction and the required visibility splays can be achieved within the highway boundary or land under the control of the developer.
- 2.40 An additional emergency access would be created to either Dean Lane or Lanham Lane for use in the event that Teg Down Meads was temporarily blocked. The access would be in regular use as a pedestrian and cycle access.
- 2.41 The local roads in the vicinity of the site are lightly trafficked and hence suitable for use by cyclists. Winchester City Centre, Winchester Railway Station, Royal Hampshire County

Hospital, and the University of Winchester are all located within a 5km cycle from the centre of the site.

- 2.42 There are bus stops located approximately 300m from the site which are served by a good quality service that provides regular connectivity to Winchester City Centre throughout the day.
- 2.43 Overall, the development would take up the opportunities for sustainable transport. Safe and suitable access can be provided for all highways users. The development would be deliverable in transport terms and there is no reason to prevent its allocation on highways grounds.

#### Water Resources

- 2.44 The key considerations in relation to water are flood (both on site and implications within the wider watercourse catchments), surface water and foul water connections.
- 2.45 The site is located entirely within Flood Zone 1 where there is a low probability of flooding from rivers and the sea and there are no established sources of flood risk.
- 2.46 Given the geological composition of the site there is a low residual risk of groundwater flooding, however there is no known evidence which demonstrates the site to possess a history of groundwater flooding and the sites raised elevation also makes this unlikely.
- 2.47 A surface water drainage strategy has been considered and it has been demonstrated that surface water runoff is able to drain from the site both sustainably and in line with local and national planning guidelines. In accordance with the surface water discharge hierarchy surface water runoff onsite is to be disposed via infiltration.
- 2.48 An indicative outline drainage strategy demonstrates that surface water runoff onsite could be served via an infiltration basin in the northeast at the low point of the site. The size of the basin will be dependent on the measured infiltration rate at the site, and a surface water storage volume should be provided for all storm events up to and including the 1 in 100-year+40% event. Additionally, a 10% allowance on impermeable areas for urban creep should be factored in the calculations.

- 2.49 Foul effluent shall drain from the proposed dwellings via a gravity conveyed foul water sewerage network which will route through the site before making a proposed connection into the public foul water network within Dean Lane, subject to confirmation with Southern Water.
- 2.50 In all respects the development proposals are considered sustainable from a flood risk and drainage perspective.

#### Noise

- 2.51 The site is generally located away from significant noise sources such as main roads and employment areas, and the residential developments which surround the proposed site indicates that the area is suitable for residential use.
- 2.52 The construction phase of the development could have short term adverse impacts upon the existing noise sensitive receptors. Based upon experience of other sites the potential for adverse impacts is related to the specific construction activity and its location or proximity to a specific receptor. While a receptor may have an increased potential for an adverse impact when works are being undertaken near to their boundary, as the work moves away from this location the potential for adverse impacts will reduce.
- 2.53 The existing ambient noise is dominated by road traffic using the local highway network. The proposed development will create additional traffic movement upon the local network, and this has the potential to result in adverse impacts upon the existing noise sensitive receptors and the future proposed noise sensitive receptors.
- 2.54 Based on the rural nature of the area it is not anticipated that the existing traffic flows will be of a level to represent a high potential for adverse impacts.
- 2.55 Sustainable design measures can be used to minimise potential impacts, additional mitigation measures such as enhanced glazing and ventilation strategies are also available to address any specific local noise constraints; however, it is considered that this may only be required for a limited number of the most exposed units.
- 2.56 In overall terms, with careful consideration of the sustainable design and mitigation measures, the site will be suitable from a noise perspective.

### Air Quality

- 2.57 Winchester City Council has one Air Quality Management Area due to exceedances of nitrogen dioxide. The Council undertook automatic air quality monitoring three sites in Winchester in 2020, with one measuring concentrations of NO<sub>2</sub> and two additionally measuring concentrations of PM<sub>10</sub> and PM<sub>2.5</sub>. WCC also have a network of passive NO<sub>2</sub> monitoring sites across its jurisdiction. A review of these sites indicates none of these are in a close vicinity of the site; therefore, it is considered that air quality in the surrounding area of the Site is not of concern.
- 2.58 The construction phase of the development could have short term adverse impacts upon the existing sensitive receptors surrounding the Site. Having reviewed the site location, it is evident that the site has a number of human receptors within 350 m of the site boundary, which could be adversely affected by construction works.
- 2.59 On this basis, an assessment of the impacts of the construction phase on these sensitive receptors will be required, in line with the Institute of Air Quality Management (IAQM) (2016) Guidance on the Assessment of Dust from Demolition and Construction document to determine the level of mitigation required to limit the dust effects on these receptors during the construction phase.

### **3. Strategic Objectives & Core Policies**

#### **Background**

- 3.1 The National Planning Policy Framework (the Framework), which underpins every local authority's Development Plan, maintains that the planning system is plan led.
- 3.2 In terms of plan preparation, the Framework and Planning Practice Guidance (PPG) set out robust guidance for local planning authorities to follow, the most relevant set out in the subsequent paragraphs.
- 3.3 Paragraph 15 of the Framework states that succinct and up-to-date plans should provide a positive vision for the future of each area and serve as a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 3.4 Paragraph 17 sets out that the Development Plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area.
- 3.5 Paragraph 31 maintains that a plan should be underpinned by relevant and up-to-date evidence, including a Sustainability Appraisal that meets the relevant legal requirements.
- 3.6 The PPG puts forward that a local planning authority must complete a review of the plan document every 5 years from the date of its adoption.
- 3.7 In relation to the examination of plans, paragraph 35 states that they are found 'sound' if they are:

Positively prepared - providing a strategy which, as a minimum, seeks to meet the areas 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;

Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 3.8 The Framework stresses that authorities should objectively identify the housing, business and other development needs of an area responding positively to opportunities for growth within an area taking account of market signals such as land prices and housing affordability. It goes on to advise that this information should advise Local Plans by setting out a clear strategy for allocating such land for such development.
- 3.9 In relation to plan-making the Framework is clear that the plan is the key to delivering sustainable development and all planning decisions must accord with the adopted Plan. Plans should identify and set out the strategic priorities for an area by planning positively to provide housing, retail, leisure and commercial development. This is encouraged through the allocation of land being identified as suitable for such development.
- 3.10 These allocations should be based on an adequate, up-to-date and appropriate evidence base including relevant market and economic signals which assess the role and function of each settlement and the capacity of these to accommodate new housing and employment growth.
- 3.11 In relation to housing, the Framework sets out that local authorities should have a clear understanding of the housing needs within their area. The Framework goes on to state that local authorities should prepare a Strategic Housing and Land Availability Assessment to fully understand the housing needs for the area and, where necessary, work across administrative boundaries to identify the scale and mix of housing that is required to meet the needs of the local population over the Plan period.
- 3.12 Such assessments should ensure that the housing needs of all different groups of society are catered for and that the scale and supply of housing is necessary to meet this demand during the plan period.

- 3.13 This regulation 18 Consultation is taking place at the same time as a NPPF consultation which includes some significant change which if adopted may require an additional Regulation 18 consultation.
- 3.14 Throughout the recent General Election campaign, the Labour Party committed to delivering 1.5 million houses over the next Parliament. Post-election, the new Government has emphasised the importance of addressing the national housing crisis and boosting the economy through this initiative. In her first speech as Chancellor, Rachel Reeves highlighted that planning reform and housing delivery are central to the Government’s economic strategy. The Government’s commitment to planning reform is evident, and while acknowledging the necessity of tough decisions and trade-offs, changes to national policy are expected to significantly increase the delivery of housing and related infrastructure.
- 3.15 There are significant changes to the Standard Method which have a significant impact on the per annum housing requirements for Winchester, but they have significant consequences on the emerging plan and its ability to meet the future needs of Winchester:

<b>Local Planning Authority</b>	<b>Current Standard Method</b>	<b>Proposed Standard Method</b>	<b>Average Annual Net additions (2020/21 – 2022/23)</b>
<b>Winchester</b>	676	1,099	1,006

### **Spatial Strategy & Strategic Policy SP2**

- 3.16 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 3.17 Policy SP2 proposes that Winchester Town will provide for about 5,640 new homes, the South Hampshire Urban Areas to provide about 5,650 new homes and the Market Towns and Rural Area to make provision for 3,850 new homes.



- 3.18 The plan proposes to deliver just 757 new homes per annum which represents a reduction of 249 new homes per annum that is currently being delivered and a reduction by 342 new homes per annum than will likely be required in the new standard method.
- 3.19 One of the aims of the WDLP is to *“provide ‘Homes for All’ and the Government has also made it very clear that it wants to boost the supply of new homes, to about 300,000 homes per annum nationally.”* However, the WDLP is on course to reduce its contribution to providing homes for all and Winchester will more likely instead contribute to a deficit of this target.
- 3.20 We also object not to the three spatial areas, but to the housing distribution set out.
- 3.21 Firstly, the housing figures should be expressed as a minimum, rather than an ‘about’.
- 3.22 This is to reflect the NPPF and ensure that the overall housing delivery in the plan period meets the need identified, whilst recognising the national policy imperative to boost significantly the supply of housing and not apply a ceiling or cap.
- 3.23 Secondly, insofar as the distribution between the three spatial areas, we consider that an over reliance is placed upon both the South Hampshire Urban Area and Market Towns and rural area at the expense of Winchester Town which is the most sustainable settlement.
- 3.24 There are significant environmental constraints to these spatial areas, for the South Hampshire Urban Area the quantum of housing envisaged requires the delivery of two new neighbourhoods which will not realise the benefits of new development upon existing communities (for example in relation to infrastructure improvements serving existing residents), whilst the extent of housing to be put to the Market Towns and rural areas risks underpinning a key policy objective to maintain rural character and individual settlement identity.
- 3.25 In contrast, Winchester Town has been the focus of significant growth in previous plans, which has been successfully delivered across the plan period and demonstrates a proven, deliverable option for the emerging plan. In the current plan, Winchester Town accommodated a far greater proportion of housing relative to the other spatial areas than is the case in this draft plan. There are suitable, achievable and deliverable site options to allocate at Winchester Town, one such example being Lanham Lane (site reference

WIN18). We object therefore to the terms of paragraph 9.27 of the plan which refers to Winchester Town being “heavily constrained”.

3.26 Paragraph 13 of the NPPF states “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”.

## 4. Housing Strategy

4.1 It is recognised by the Government that there is an urgent need to increase the rate of house building in England and make housing supply more responsive to changes and demand.

4.2 Paragraph: 008 Reference ID: 2a-008-20190220 states:

Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.

However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.

4.3 The Local Plan for the period 2020-2040 aims to provide around 15,115 new dwellings, excluding the South Downs National Park area. The plan prioritises using previously developed land within settlement boundaries and completing strategic allocations in Kings Barton, Newlands, and North Whiteley. Housing development will be distributed as follows:

Winchester Town: about 5,640 dwellings

South Hampshire Urban Areas: about 5,650 dwellings

Market Towns and Rural Area: about 3,825 dwellings

4.4 This plan also includes contributions towards the unmet housing needs of adjoining areas.

### **Strategic Policy H1 – Housing Provision**

- 4.5 In part this policy replicates the provisions of Policy SP2, which we have objected to elsewhere in these representations. Those objections – focussed upon the distribution of housing between the three spatial planning areas – apply in relation to H1 (in essence, the distribution should have a greater focus upon Winchester Town).
- 4.6 So far as the housing requirement, we object on the basis that this is expressed as an ‘about’ rather than being a ‘minimum’ to reflect the provisions of the NPPF and the national imperative to boost significantly the supply of housing.
- 4.7 The housing requirement figure currently being planned for is 15,115 dwellings (505 less than the Regulation 18 figure). It is important that this does not fall below the standard method figure at the point of plan submission, allowing for the buffer as included in the policy which we would support. However, it is already apparent that the Standard Method will be modified and that this plan will fall significantly short of what is required in this area.
- 4.8 So far as the approach to meeting the housing requirements, we object to the inclusion of outstanding planning permissions (1,091) and remaining local plan allocations (1753) without applying any deduction for non-implementation. Typically, we would expect to see a 20% deduction to provide for a robust approach, in this instance this would equate to a reduction from these two housing sources of 569 dwellings to be found from other sources, typically additional allocations.
- 4.9 In terms of windfall, this is inevitably a finite resource. Windfall should be a buffer for development plans providing a safety net in case circumstances change and there is an increased demand for housing. The expected level of future windfall is not realistic and does not take account of how permitted development rights have influenced past windfall rates. The supply from this stream is likely to have been exhausted or certainly depleted at best and there are no known new permitted development right changes which could generate the same level of windfall housing. The Council should evidence the approach more fully, and as above apply a discount of 20% in recognition that if the plan does correctly identify and allocate development opportunities through a robust and proportionate evidence base the extent of windfall reduces, particularly given the approach this plan is presently taking to prioritising previously developed land and limiting development in the countryside. As a result, the windfall allowance should be reduced by 313 dwellings.

- 4.10 The emerging plan only seeks to deliver at a rate of 757 dwellings per annum, significantly lower than might be required by the proposed method and more than the 200-threshold set out in the transitional arrangements which require even adopted plans which are less than 5 years old to begin the process of plan making.
- 4.11 Taking these matters in the round, we consider that allocations should be increased by 6,865 dwellings to ensure the minimum 21,980 dwellings is met.
- 4.12 In addition, the limitations we have identified with the supply mean that new allocations are required to increase by 882 which means a total of 7,747 additional houses are required to meet the needs of Winchester over the plan period.

### **Strategic Policy H3 – Spatial Housing Distribution**

- 4.13 In part this policy replicates the provisions of Policy SP2, which we have objected to elsewhere in these representations. Those objections – focussed upon the distribution of housing between the three spatial planning areas – apply in relation to H3 (in essence, the distribution should have a greater focus upon Winchester Town).
- 4.14 For Winchester Town, of the 5,670 dwellings (which should be expressed as a minimum, and increased to reflect our objections to SP2), the requirement to allocate will similarly need to be increased from 7,747 dwellings to reflect our objections to H1.

## 5. Employment Strategy

- 5.1 The NPPF states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings.
- 5.2 The Planning Regeneration & Infrastructure Employment Land Study Final Report July 2024 (PRIE) was undertaken by Lambert Smith Hampton. The report recognised the falling demand for office development but that the three models used to predict future growth were in alignment. However, for Industrial uses there was significant misalignment which required further analysis.
- 5.3 The three models used were Cambridge Econometrics (CE), Oxford Economics (OE) and Experian. Only OE and Experian took account of demographics. It is perhaps not surprising then that the CE forecast the lowest jobs growth.
- 5.4 Of course, all models and the study itself is based on the housing growth in the draft plan which must be recognised will not represent actual housing need once the NPPF changes are confirmed. The effect of this will be this evidence will require updating.
- 5.5 The PRIE also highlights that there have been past losses of employment land as it has been redeveloped for housing.
- 5.6 For Industrial Land “The labour demand forecasts show a range from 10.1ha (OE) to 52.4ha (Experian). The CE forecast (17.6ha) and past completions trend (24.3ha) sitting towards the lower end of this range”. The study concludes that “This shows a need for the 2022-40 period of around 24.3ha – 26.7ha for B2/B8 space, and 3.3 – 12.2ha for office space. This shows an overall total need for 27.6ha – 38.9 ha of employment land.”
- 5.7 The calculated land supply from sites with permission and future allocations is 49.86ha which is 22% more than is required over the plan period based on the average model. However, this evidence is already out of date, because we already know that there is a 50% increase in housing supply over the next plan period. This fact will not change whether or not the Council chooses to proceed with an unsound plan, or even if the plan is adopted where the Council will be faced with an immediate plan review.

## **Strategic Policy E2 - Spatial Distribution of Economic Growth**

5.8 This policy sets out the Strategy for the spatial distribution of Economic Growth across the following areas:

### **Winchester Town Area**

- Bushfield Camp (Policy W5)
  - Winnall (Policy W6)
- Mixed use allocations;
- Central Winchester Regeneration Scheme (Policy W7)
  - Station Approach Regeneration Area (Policy W8)
- As part of major housing allocations;
- King Barton Major Development Area (Policy W1)

### **South Hampshire Urban Area**

- Solent Business Park (Policy SH4)
- As part of major housing allocations;
- West of Waterlooville (Policy SH1)

### **Market Towns and Rural Area**

- Tollgate Sawmill, Bishops Waltham (BW3)
- As part of major housing allocations;
- Sun Lane, New Alresford (NA2)
  - Morgans Yard, Waltham Chase (WC1)

5.9 Most sites are existing employment areas and the much of the increase in floorspace will be through higher densities. Finding new employment sites in sustainable location is difficult because of the need to protect residential amenity which is not always compatible with employment uses in particular.

5.10 Sire John Moore Barracks is ideally suited to deliver employment due to the proximity to residential areas but also because it already has a buffer to these areas with only the centre strip of the site currently developed. Policy W2 which allocated the site for housing would sterilise an opportunity to provide sustainable employment development for the next plan period. As evidence currently exists that there will be a need the Council should consider an immediate review of a development plan in the context of the New Standard

Method and make sure that allocating sites now do not compromise the opportunities for future generations to meet their own needs, which is the key to sustainable planning.



## 6. Housing Policies

### **Policy W2 – Sir John Moore Barracks**

- 6.1 We raise significant concerns in relation to allocating this site for development.
- 6.2 Firstly, there is no certainty that the site is available, and can be developed out in the quantities envisaged (900 houses), in the plan period. There is a long history associated with this site, in terms of the sites' availability for redevelopment. The plan is silent on the timescales for the site to be available, nor any contingency in the event of a phased release and how this might interface with a residential led redevelopment given, for example, there is only a single vehicular access point serving the site. Self-evidently, ongoing MOD operations and civilian construction and operation traffic are incompatible. The latest evidence is that the site will be available from 2024, however this is not a binary date, and the plan will be submitted before the site is vacated and available – any delay in availability cannot be integrated in to the plan. This is a serious risk.
- 6.3 Secondly, the development quantum is as yet untested. There is no detailed heritage assessment for the site, it is not clear what net development zones are appropriate, and as a result yield could significantly reduce. As drafted Policy W2 leaves a significant amount of assessment work to the planning application stage, when in fact this is key evidence base assessment work to inform the extent to which features need to be retained and incorporated, and in turn the implications for development yield. We are aware of numerous examples where existing above and below ground heritage assets on MOD land have significantly limited the extent of redevelopment. At present we consider it premature to include this site in the plan, pending full assessment of a range of issues.
- 6.4 Thirdly, we do not consider that a residential led scheme is appropriate for this site, a view shared by key stakeholders such as the local MP. The nature of the site, and former operations, lend themselves to a knowledge-based employment led proposal, in favour of the residential led proposal being planned for. Good examples of this approach can be seen at Bicester Heritage and Upper Heyford (both Cherwell District) where former MOD land has been put to high technology new employment uses, building upon the heritage of the site and incorporating above and below ground heritage assets. Such an approach needs to be considered carefully for this site.

### **Policy W5 – Bushfield Camp**

- 6.5 This is a site carried forward from the existing plan, for employment purposes.
- 6.6 We raise significant objection to this allocation. As the plan makes clear at various points, this is a highly sensitive site in relation to topography, flood risk, landscape/coalescence. Master planning has not been undertaken, and it is not clear the extent to which the significant and wide-ranging constraints can be addressed. Until a full assessment is undertaken, this site should not be included within the plan.
- 6.7 In any event, because the site is being rolled forward from the existing plan, significant question marks remain as to its suitability and deliverability. The plan does not explain why the site is now likely to come forward. Absent of this justification, the site should be removed from the plan.
- 6.8 We recognise that the delivery of employment land is a key objective and requirement of the plan, however deleting this site need not prejudice the realisation of these objectives given our representations in relation to Policy W2 (Sir John Moore Barracks) which we consider would more appropriately be put to employment led development at the point at which it is known when the site is available.

## 7. Conclusion

- 7.1 The Framework requires that local plans area examined to assess whether they have been prepared in accordance with the legal and procedural requirement. Plan must meet the tests of soundness which are:
- a) Positively prepared – providing 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;
  - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 7.2 Spatial Strategy & Strategic Policy SP2: Meeting out Housing Needs is not positively prepared or justified and does not take account of the emerging NPPF or provide sufficient flexibility if there is any shortfall in delivery. The plan should be taken a step back to increase housing allocations in sustainable locations.
- 7.3 Strategic Policy H1 – Housing Provision: There is insufficient housing allocations to meet the emerging need so that plan is not positively prepared or justified and does not provide sufficient flexibility if there is any shortfall in delivery. The plan should be taken a step back to increase housing allocations in sustainable locations.
- 7.4 Strategic Policy H3 – Spatial Housing Distribution: The distribution of housing is not focussed on the most sustainable settlements such as Winchester which proposes less

houses than other areas. For this reason, the policy is not positively prepared, justified, effective or consistent with National Policy. The plan should be taken a step back to remove or reduce the proposed TSA and increase housing allocations in more sustainable settlements.

- 7.5 Strategic Policy E2 – Spatial Distribution of Economic Growth: The employment allocations do not consider a worst-case scenario employment need model which is now also out of date because it will be based in the wrong standard method for housing growth. For this reason, the policy is not positively prepared, justified or consistent with National Policy. The plan should be taken a step back to increase employment allocations in sustainable locations.
- 7.6 Policy W2 – Sir John Moore Barracks: The allocation of this site for housing would mean that a sustainable location for employment uses which do not have a significant detrimental effect on adjacent uses would be sterilised for this use, in the context of a growing need for employment sites. For this reason, the policy is not positively prepared, justified, effective or consistent with National Policy The plan should be taken a step back to change the allocation to an employment one.
- 7.7 Policy W5 – Bushfield Camp: The allocation of this site for housing would mean that a highly sensitive site in relation to topography, flood risk, landscape/coalescence currently used for Employment would be sterilised for this use, in the context of a growing need for employment sites. For this reason, the policy is not positively prepared, justified, effective or consistent with National Policy The plan should be taken a step back to change the allocation to an employment one.
- 7.8 Because not all the relevant information is considered, not all of it is up to date and because the Sustainability Appraisal does not consider and therefore does not demonstrate that all relevant economic, social and environment objective are addressed the plan is not consistent with National Policy so would not enable the delivery of sustainable development and fails the soundness test in this respect.

**Appendix 1, Lanham Lane,  
Winchester**



Key



**nineteen47**  
 CHARTERED TOWN PLANNERS  
 & URBAN DESIGNERS

Project  
 Lanham Lane, Winchester

Drawing Title  
 Site Location Plan

Project Code	Drawing No	Rev
n1925	001	-
Date	Drawing Scale	
11.05.2024	1:2500 @ A3	