

## Privacy and publication

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### Privacy Notice

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Further information about how Winchester City Council uses personal information can be found on our website at [www.winchester.gov.uk/strategies-and-policies/privacy-policy](http://www.winchester.gov.uk/strategies-and-policies/privacy-policy).

**1. Please confirm that you have read and understood the above.**

**(Required)**

## **PART A**

### **About you**

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

#### **2. What is your full name or client's name if acting as an agent?**

Name of respondent (or client): (Required)

VIVID Housing

#### **3. If you are representing an organisation or acting as an agent, please provide the name below.**

Organisation/Agent:

Pro Vision Planning & Design

#### **4. What is your address?**

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: (Required)

██████████

Street address 1: (Required)

██████████

Street address 2:

Town/area: (Required)

Postcode: (Required)

**5. What is your email address?**

Email address:

**6. What is your phone number?**

(Required)

Phone number:

**7. By submitting this form I acknowledge that;**

**a) my response, together with supporting information, which includes my name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and**

**b) my name will be published, together with my response, in the Winchester City Council Local Plan Examination website.**

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

Yes, I would like to be kept up to date with Local Plan developments

No

**PART B**

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)

DEN1
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**Do you consider the supporting text and policy are:**

(Required)

	Yes	No
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sound</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/>

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

See text below
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Please make sure that you put in all the evidence and information needed to support your representation.

**What modification(s) are necessary to make the policy legally compliant or sound?**

See text below
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**What is your suggested wording or text for the policy:**

See text below
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**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

- Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate
- No, I don't want to take part in a hearing session

#### DETAILED COMMENTS

VIVID has an interest in the land south of Forest Road, Denmead (Site DE22). VIVID is a specialist provider of affordable housing in the region, and is therefore a stakeholder in the plan.

We note that the intention within the Regulation 19 version of the emerging Local Plan (the Local Plan) is still to identify a quantum of development to occur at Denmead, but defer the site selection process to the emerging replacement for the 2015 Neighbourhood Plan.

At Regulation 18 stage in December 2022 (when it was unclear how quickly the replacement Neighbourhood Plan (rNP) would proceed), we commented that *“there may be scope for more than the additional 100 homes”* and the *“estimate of 50 windfall homes is considered to be optimistic”* (via representation [1023218185](#)). This remains relevant in the context of the proposed revisions to the National Planning Policy Framework (NPPF), including the new standard method for calculating housing need, but also in the context of the challenge for this Local Plan to address affordability and unmet needs in the region.

Denmead is classified as a Large Rural Settlement in the Settlement Hierarchy (Strategic Policy H3) reflecting its level of daily facilities and other facilities (Settlement Review Background Paper August 2024), including Primary School, local convenience retail, local employment and sport facilities (‘Key services’), as well as, amongst others, post office and doctors surgery (‘Other facilities’).

The evidence confirms that this large village has a good degree of sustainability, therefore, is a logical location for sustainable growth. It is also close to the neighbouring authorities with unmet needs, including Portsmouth and Havant.

Policy DEN1 sets a housing requirement of 100 homes for the new Neighbourhood Plan. Capacity for housing development is significantly higher than this requirement. Fifteen sites are identified in the SHELAA with an estimated capacity of 1,703 dwellings (DSSS, paragraph 6.22). Therefore, around only 5% of the available capacity will be required to be allocated

though the new Neighbourhood Plan, or in other words, 95% of the available capacity will be omitted.

For affordable housing, the consequence is a significant constraint on the number of affordable homes that might otherwise be achieved from the available land.

In the context of significant unmet need from neighbouring authorities in South Hampshire, this is also a significantly constrained policy approach from the Local Plan.

Consultation on the Neighbourhood Plan in September 2024 (the Options 24 consultation) has three alternative options. These range from 91 homes to 100 homes; none of the options consider going above that requirement. The Local Plan is the factor constraining supply of new homes and affordable homes.

This level of constrained supply needs to be appreciated in the context of the national policy objective to significantly boost housing supply (NPPF 60) and in the context of affordability being one of the most significant issues in the district – and the delivery of affordable homes “a major issue” and “a critical priority”(Local Plan paragraph 9.36) – plus significant levels of unmet need from neighbouring authorities.

VIVID therefore considers that the requirement for Denmead is not justified by the evidence base, is inadequate in the context of need, and does not represent positive planning. More can and should be done through plan making to tackle the major affordability challenge in the district and the sub-region.

Notwithstanding the growing scale of local housing need, VIVID is concerned that documents supporting the rNP that purport to fulfil the obligations of The Environmental Assessment of Plans and Programmes Regulations 2004 fail to assess all the sites that have been put forward for consideration. In particular, the [Denmead Site Assessment and Options Appendix A Pro Formas June 2024](#) document, which underpins the [Denmead Site Assessment and Options Final Report July 2024](#) omits any assessment of 14 promoted sites that lie to the south-east of the Denmead settlement boundary (between Denmead and Waterlooville).

We note that the Integrated Impact Assessment (IIA) includes assessment of most of the available sites in the settlement gap, including Site DE22, whereas the equivalent document supporting the rNP does not. It is clear that WCC recognise that, in accordance with the NPPF, the settlement gap policies are not the blanket “screening out” factor that the Steering Group (through its consultants AECOM) have, erroneously, concluded it to be.

This omission has resulted in Pro Vision writing to the Steering Group for the rNP (in Sept 2024) expressing concern that the NP process has a potential procedural problem and recommending that its consultant (AECOM) completes full assessments of all sites, including DE22.

VIVID conclude that at the very least the rNP should assess sites between Denmead and Waterlooville to assess their sustainability credentials as well as their impact on the function of the settlement gap (in accordance with policy NE7).

However, we also have concerns over the review of the settlement gaps in the Local Plan evidence base<sup>1</sup>. The scope of the assessment appears unclear. The district-wide LUC Review gives no commentary or reassessment of the previous settlement gap assessments undertaken to inform Policy CP18 of the 2013 Local Plan.

The report does not clarify whether all or part of the current settlement gaps perform in accordance with the 'definition' of a settlement gap in order to make judgements as to whether the boundaries should be adjusted, either expanding or reducing.

Neither does the LUC Review include field work but appears to be a map-based exercise. This contrasts to other settlement gap reviews in neighbouring South Hampshire authorities, including Test Valley and Eastleigh. We conclude that this is the reason why only broad-brush considerations about gap alterations are given.

Noting that Denmead has a requirement for housing sites from the Local Plan, and several of the SHELAA sites are in the Denmead-Waterlooville Settlement Gap, we would have expected that the LUC Review would have looked in greater detail at this gap, in line with Policy NE7, at how it functions, and whether there is capacity to adjust boundaries to facilitate sustainable development opportunities, such as Site DE22 in the Denmead-Waterlooville gap.

For the Denmead-Waterlooville Gap<sup>2</sup>, only general comments are given. For example, the relevance of Hambledon Road is noted, which provides a direct link between the settlements, and that there is a risk of development along this route harming the function of the gap. In principle this is agreed. However, Site DE22 includes the northern most section of this road (on the southern edge of Denmead) and VIVID's vision for the development of the site includes reinforcing the green boundary along the road whilst also integrating the public open space at Goodman's Fields to improve pedestrian accessibility. The LUC Review has not considered this development concept, which was submitted at Draft Local Plan (Regulation 18) stage.

Overall, therefore, we have concerns that the LUC Review is not at level of detail that it needs to be to positively inform the development strategy, not least for growth opportunities at Denmead.

We also have concerns over the assessment of Site DE22 in the IIA. It has been assessed as having a 'major negative' score on heritage (IIA Objective 11[a] Heritage Impact). According to the IIA methodology, 'major negative' means risk to heritage assets. This is at odds with the SHELAA, despite the IIA specifically stating that it uses the SHELAA for the assessment of Objective 11. . Reference to the SHELAA assessment for DE22 shows that there are no heritage impacts (all 'Historical Constraints' are categorised as 'green', as is Archaeology). The IIA scoring for DE22 is therefore inaccurate and should be reviewed. It should be recorded as "Negligible" (which is the most positive option in the IIA methodology for the heritage objective).

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<sup>1</sup> Settlement Gap Review, July 2024, LUC (the LUC Review).

<sup>2</sup> Page 26 (although there is notable duplication of paragraphs throughout the document).

A vision and concept master plan has been submitted to the Steering Group showing how development of DE22 could deliver around 100 homes<sup>3</sup> including affordable homes, (which, at the policy requirement for greenfield sites, equates to potential for around 40 affordable homes) and including wider public benefits relating to integration of existing public open space with the village, whilst preserving the function of the settlement gap, providing a strong, defensible boundary. We acknowledge that site selection is a matter deferred to the neighbourhood plan process and therefore do not repeat that site specific information here (although it has already been shared with the City Council at Regulation 18 stage).

The interaction between the Local Plan and the neighbourhood plan process in Denmead (and elsewhere in the district) needs to be effective, given the responsibility that is deferred to these local communities. It is also appropriate that the Local Plan includes appropriate contingency plans should the neighbourhood plan process fail, for whatever reason, to deliver the strategic objectives. Policy DEN1 (in common with the other Neighbourhood Plan Area policies) is missing a contingency plan. Other local authorities, such as South Oxfordshire District Council<sup>4</sup> and the West Berkshire Local Plan Review include such contingencies recognising the potential for complications, including the requirement for a referendum before plans are 'made' and become part of the development plan.

**Proposed modification: Increase in the housing requirement for Denmead in the context of affordability issues and unmet needs from neighbouring authorities, and the scale of available land, and inclusion of contingency plans in the event that the neighbourhood plan process is unable to identify land for development within a reasonable timescale.**

**Corrections are needed to the IIA (Site DE22) and the Settlement Gap Review should be expanded.**

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<sup>3</sup> The SHELAA states erroneously that DE22 is 13.227 hectares rather than 3.2 hectares, and therefore, is suggesting, misleadingly, a capacity of 198 dwellings. The site boundaries are, however, defined correctly, in which case this appears to be a previous site area when additional land was assessed.

<sup>4</sup> South Oxfordshire Local Plan 2020; Policy H4. West Berkshire Local Plan Review (Policy SP12, as modified during the Examination, 2024 [modification PQ14]).