

From: Caroline Cahill

Sent: 31 March 2025 16:09

To: Programme Officer

Subject: Re: Winchester LP - Latest News - Document added to the website

I wish to make a response to the inspector's matters, issues and questions in relation to policy H4.

Response to Policy H4

" This policy is not sound as currently written. The policy omits to identify how small infill development sites, within existing ribbons of housing and which form part of an existing settlement envelope but which have been placed outside a settlement's (neighbourhood) development boundary, should be treated for planning. There is no provision with the current policy for development of these small infill sites outside a development boundary.

This policy omission applies to small infill sites which lie outside the defined settlement boundaries listed in H4 - point A ie Bishop's Waltham, Colden Common, Compton Down, Denmead, Hursley, Kings Worthy, Knowle, Littleton, Micheldever, Micheldever Station, New Alresford, Old Alresford, Otterbourne, South Wonston, Southdown, Southwick, Sparsholt, Sutton Scotney, Swanmore, Waltham Chase, Whiteley, Wickham, Winchester Town.

In many cases these infill sites are currently rejected in planning due to the lack of a policy for infill sites which simply exist on the wrong side of the development boundary, often by only a few metres, placing the site in the countryside for planning purposes. These sites are not within the countryside but form intrinsic part of existing settlements. Such sites are often in more sustainable locations and closer to settlement centres than some areas at the edges but within settlement boundaries.

The NPPF section 2 - Achieving sustainable development- Paragraph 11

1. *Plans and decisions should apply a presumption in favour of sustainable development. For plan making that means :*

A) all plans should promote a sustainable pattern of development

NPPF Paragraph 83 - housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

Policy H4 does **not** fulfil the NPPF guidance (shown above) since it makes no provision to allow for small infill sites located outside a development boundary to provide towards local communities and does not treat planning applications on such sites to the NPPF requirement of a presumption in favour of sustainable development. The omission of policy detail for such sites means policy H4 is not complying with the NPPF.

To comply with the NPPF policy H4 should include policy provision for development of small infill sites which lie outside a development boundary (neighbourhood plan boundary), that are in sustainable locations and do not extend an existing ribbon of dwellings.

These small sustainable infill sites can provide a valuable contribution to dwelling provisions without impacting on countryside locations, bring forward small sites quickly, enhance local communities since many sites will be fulfilled by smaller local developers /trades.

Policy H4 recognises these small infill sites when no settlement development boundary exists and makes provision for them. But the same policy omits to address small infill sites which lie close to but outside a development boundary meaning they are treated differently, and their valuable contribution is not being recognised or allowed, making the policy inconsistent in its treatment of small infill sites.

The value of these small infill sites outside a development boundary has been recognised by neighbouring planning authorities e.g. Fareham DC which included Policy HP2: New Small-Scale Development Outside the Urban Areas ie development boundary, in their local plan. By omitting a similar policy WCC leaves these small infill sites in a situation where they would be allowed in neighbouring Fareham DC but rejected by WCC. This leaves planning for such sites in an inconsistent state depending on which planning authority considers a planning application for these small infill sites outside the development boundary.”