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Winchester District Local Plan

Winchester City Council Local Plan Examination

Hearing Statement Matter 8: Development Allocations the Market Towns and Rural Areas (MTRAs)

April 2025



Winchester
City Council

Matter 8 Development Allocations the Market Towns and Rural Areas (MTRAs)

Issue: Whether the proposed housing site allocations in MTRAs would be justified, effective and consistent with national policy?

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Market towns

Bishop's Waltham

Policy BW1 The Vineyard/Tangier Lane

- 1. Would policy BW1i, in requiring a masterplan with each application for development be effective? Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals? Would Policy BW1 iii be clear in its intent?**

WCC response:

- 1.1 The site was allocated in adopted Local Plan Part 2 for 120 dwellings split over two land parcels. The allocation included a requirement for a footpath/cycleway which linked with another allocation at Albany Farm. The site has since gained planning consent and the approval 16/01322/FUL was accompanied by a section 106 agreement to secure the link.
- 1.2 Development of the site has progressed, with the remaining dwellings being delivered in 2023-24. The footpath/cycleway has not been completed and is the subject of ongoing discussions with the developer, relevant landowner and the Parish Council. Proposed Modification PM109 was suggested to update the text of the Plan to clarify this position. However, given that the only outstanding matter relating to this development is the completion of the link, on reflection it is considered that policy BW1 is redundant and can be deleted from the Plan. The delivery of the outstanding link is the subject of a s106 agreement which is unaffected by the presence or absence of a development plan policy and this can continue to be progressed. Therefore it is proposed that the policy is deleted (PM200) and consequential revisions to the map on page 392 of the Proposed Submission Local Plan (Regulation 19) (PM172).

- 2. Would it adequately address requirements for offsite infrastructure? Would the policy adequately address the need to promote infrastructure for active forms of transport?**

WCC response:

- 1.3 As outlined in the answer to the previous question, this policy has now been proposed to be deleted.

Policy BW4 Land North of Rareridge Lane

1. Would policy BW4 accord with the NPPF paragraph 182, which requires great weight to be attached to conserving and enhancing landscape and scenic beauty in National Parks?

WCC response:

1.4 The city council believes that Policy BW4 would accord with paragraph 182 of the NPPF. It is also important that the Local Plan is read as whole as there are a number of other policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). In view of this, the city council believes that the rural setting of the settlement would be preserved and the scenic beauty of the SDNP conserved and enhanced.

1.5 While the site allocation sits beside the SDNP, regard has been taken of the need to conserve and enhance landscape and scenic beauty in the SDNP by stipulating that development should be set back from the boundary with the SDNP and pulled away from the higher parts of the site, leaving existing trees on the northern and eastern boundary to both screen the development from the SDNP and provide biodiversity net gain. Additional tree planting is required to mitigate off site impacts and together these 'landscape-led' steps will reduce the capacity of the site but conserve the landscape and scenic beauty of the SDNP. Finally, it is worth noting Proposed Modification PM114 to show the boundary of the SDNP in the application and inset maps to clarify to proximity of the National Park when considering planning applications.

2. Given the existing use of the site, along with other site constraints, including ecological constraints, what is the evidence to justify the indicative site capacity and generation of required Biodiversity Net Gain?

WCC response:

1.6 Whilst it is accepted that like many other sites there are constraints which the supporting text and the criterion in Policy BW4 has identified. The city council believes that it is important to read the Local Plan as a whole as there are a number of policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character).

1.7 No part of the Site is covered by any statutory designations, and any such designations that do exist in the wider area are separated from the Site. Equally there are no non-statutory designations affecting the site or its surroundings. Nonetheless, the site does have some ecological value and the site promoters have advised that they anticipate requiring some off-site credits to fully secure biodiversity net gain. The indicative capacity of this site (BW17) in the SHELAA

is 126 dwellings. The allocation of 100 dwellings is considered to be a reasonable assessment whilst ensuring potential impacts are mitigated through design.

3. Would the requirements of Policy BW4vii be clear in their intent so as to render the policy effective?

WCC response:

1.8 The purpose of criterion vii has been drafted in collaboration with Hampshire County Council as Highway Authority to ensure that the potential traffic impacts of this proposed allocations are appropriately managed. Following comments received from the County Council at the Regulation 19 consultation, a Proposed Modification PM113 is suggested to provide further clarification on what measures are likely to be necessary.

4. Policy BW4i would require a landscape led masterplan. Policy BW4 ix and x provide additional requirements that could be covered by that masterplan. Paragraphs 14.20 and 14.24 set out requirements of a landscape led masterplan also, some of which are excluded from the policy text. In so doing, would the policy be effective? In this regard, would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.9 The city council believes that the supporting text and the wording of Policy BW4 is consistent. For example, criterion v (deals with pedestrian crossing and improved access to the PROW which is referred to in paragraph 14.22), criterion i (deals with heritage assets, landscape character and key public views which is referred to in paragraph 14.20 and 14.24), criterion vii (deals with 30 mph and village gateway which is referred to in paragraph 14.22). One of the only matters that does not appear to have been covered in full in the policy wording is reference to 'ridgelines and roof heights' (paragraph 14.24 of the supporting text). However, arguably this would need to be assessed as part of the topography and the contours of the site which have been referred to in criterion i.

5. Would the phasing of the latter part of this site allocation until 2030 be justified by the evidence?

WCC response:

1.10 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations, which are not for priority housing, from coming forward until 2030. This shows that,

without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).

- 1.11 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.
- 1.12 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).
- 1.13 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

New Alresford

Policy NA1 The Dean

- 1. Given this is an existing site allocation carried over from the extant Plan, what is the evidence that homes without planning permission will be delivered in 2026/27?**

WCC response:

1.14 The Dean development, in New Alresford, is allocated for development in the Winchester District Local Plan Part 2 (Development management and site allocations) by Policy NA2, which would be superseded by Policy NA1 (please see Schedule of Proposed Modifications ([SD14a](#)) – PM 168).

1.15 Most of the site is now developed but two areas remain. One has full planning consent and is subject to a current application for variation of a condition. This site is included in the housing trajectory Section D sites as ‘NA1 The Dean 17/02306/FUL’ for 20 dwellings. The other did not have consent at the base date of the Local Plan so is included in trajectory Section H as ‘NA1 The Dean (remaining)’ for 14 dwellings. Planning permission was subsequently granted in September 2024 for 14 apartments and a 40 space car park under application 23/00701/FUL. Work has recently started on site, in terms of demolishing the existing buildings and preparation for construction. In view of the fact that work has now commenced on site, the city council is confident that the remaining part of the site will be completed in 2026/2027.

2. What is the status of the masterplan for the west of The Dean? Policy NA1 seeks to ensure development reflects the principles established in that masterplan. In so doing would the policy be effective? And would this result in a plan-led scheme?

WCC response:

1.16 Yes, the masterplan for The Dean has been agreed by the city council and has been used to guide and control development that is now taking place on the site. As all parts of this site now have planning consent and the remaining development is now taking place, the city council believes that the policy is effective and it has resulted in a plan-led scheme which does accord with the agreed masterplan for the site.

3. Would policy NA1 ensure adequate provision of necessary offsite infrastructure?

WCC response:

1.17 The Council is proposing a modification to add a new criterion (xi) requiring the provision of necessary physical and social infrastructure ([SD14a](#), PM115). This is primarily in response to representations by the Integrated Care Board, as other necessary offsite infrastructure has already been secured as part of the planning permissions that have been granted for the various parts of the site, the last of which are now being implemented. This is secured through the associated planning conditions and S106 obligations.

Policy NA2 Sun Lane

1. Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.18 Yes. The Sun Lane development, in New Alresford is allocated for a mixed use development in the adopted Winchester District Local Plan Part 2 (Development Management and Site Allocations document) under Policy NA3 (LP04). The site was granted outline planning permission (17/01528/OUT) and reserved matters were subsequently agreed under planning application number 21/01731/REM. The site developer (Taylor Wimpey) has recently commenced work on site, with the first dwellings due to be completed in summer 2025 and now being marketed.

1.19 The Council is proposing a modification to add a new criterion (xvi) requiring the provision of necessary physical and social infrastructure (SD14a, PM117), primarily in response to representations by the Integrated Care Board. Otherwise, the city council believes that the policy has been clearly written, is unambiguous and has resulted in an appropriate planning consent being granted for the whole site. However, as it is large site and it will take a number of years to complete, it is considered that the policy should still remain in the Local Plan. Subject to work progressing on site the need for this site allocation can be reviewed in the Local Plan Review which is commencing as soon as this Local Plan is adopted.

2. Would it appropriately address the requirements of offsite infrastructure, impacts on the Groundwater Protection Zone, promote active travel and enable its infrastructure?

WCC response:

1.20 The Council is proposing a modification to amend criterion (xiv) requiring a groundwater risk assessment (SD14a, PM116). This is primarily in response to representations by the Environment Agency. The site has already been granted detailed planning permission (see above comment) and development has now commenced on the site. The city council does not consider that any further changes are necessary in relation to the Groundwater Protection Zone, active travel, etc in order to improve the soundness of the Local Plan.

Policy NA3 Neighbourhood Plan Designation Area

1. What is the evidence to justify an approach to designate an additional site/sites in the Neighbourhood Plan?

WCC response:

1.21 The city council confirmed on the [7 September 2021](#) to New Alresford Parish Council the Neighbourhood Area for the purposes of preparing a New Alresford Neighbourhood Plan. The boundary of the Neighbourhood Plan coincided with the parish boundary. New Alresford Town Council subsequently confirmed in writing to the city council that they wanted to investigate whether a Neighbourhood Plan could accommodate the 100 dwellings that had been allocated to the Town Council in the Regulation 18 Local Plan. An allocation of this size reflects the Local Plan's spatial strategy as set out in policy H3, as reflected in policy NA3.

1.22 The Town Council have been progressing with work with the local community on preparing a Neighbourhood Plan and at the most recent public consultation event, on the 21 November 2024, copies of all of the draft Neighbourhood Plan policies were on display along with development sites that were put forward by land promoters/developers for development. Various site promoters were on hand at the public consultation event to answer any questions from members of the public about their site. The Town Council are now in the process of analysing the representations that have been received to this public consultation event and expect to consult on the draft Neighbourhood Plan (Regulation 14) in the Autumn 2025. Further details about the [New Alresford Neighbourhood Plan](#) are available on the New Alresford Town Council website.

2. When is the Neighbourhood Plan expected to be 'made'? What is the evidence that it will come forward in an appropriate and timely manner?

WCC response:

1.23 Discussions with the Town Council have indicated that they expect the Neighbourhood Plan to be made in 2026. As mentioned, in the response to question 1, a significant amount of work has already taken place on preparing the New Alresford Neighbourhood Plan and there has already been ongoing constructive engagement with the local community on the scope and content of the Neighbourhood Plan. Further details are available on the [New Alresford Neighbourhood Plan website](#).

1.24 In the unlikely event that the Neighbourhood Plan did not progress to being 'made', the City Council may need to address the situation in reviewing the Local Plan, including the possibility of making an appropriate allocation itself.

3. What is the evidence that there are suitable sites available for designation? Would this approach provide the necessary certainty for the development

plan process? In taking this approach would the Plan accord with a Plan led approach?

WCC response:

1.25 The [New Alresford Neighbourhood Plan consultation event](#) that took place on 21st November 2024 identified 6 potential housing sites that had been put forward for development as part of the neighbourhood plan process. The city council believes that there are potential options available in New Alresford to meet the 100 dwellings, as confirmed by the Neighbourhood Plan work so far. Officers are having ongoing constructive engagement with the Town Council about identifying sites for development and moving the Neighbourhood Plan forward.

4. If the Neighbourhood Plan was not made in a timely manner, how would the housing shortfall be made up?

WCC response:

1.26 The city council believes that given the amount of work that New Alresford Town Council have put into preparing the Neighbourhood Plan there is every expectation that the Neighbourhood Plan will progress in a timely manner. If for any reason the Neighbourhood Plan does not progress, any housing shortfall would need to be picked up in the early review of the Local Plan.

5. Should policy NA3 address off site infrastructure needs? Would it be necessary for the purposes of soundness to address the requirement to liaise with water and waste water providers?

WCC response:

1.27 The city council have proactively engaged with a number of infrastructure providers in the process of preparing the plan including the ICB and Southern Water. The Council consider it necessary to address the offsite infrastructure needs proposed by the ICB and Southern Water in their Regulation 19 consultation response. The Council propose additional wording to the supporting text PM118 in the Schedule of Proposed Modifications ([SD14a](#)) for Policy NA3 to reflect the comments made by Southern Water providing clarification in relation to the requirement to liaise with water and waste water providers.

1.28 Furthermore, the city council proposed PM 119 in the Schedule of Proposed Modifications ([SD14a](#)) to reflect the comments made by the ICB in relation to infrastructure requirements.

6. Would the phasing of development until 2030 be justified by the evidence?

WCC response:

- 1.29 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations which are not for priority housing from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).
- 1.30 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there is a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to prioritise the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.
- 1.31 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, it also helps to address the delivery of infrastructure. All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).
- 1.32 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, consequently having a dramatic impact on the five-year housing land supply – please see table in response to Matter 10 in response to Policy NE16. In view of the above, the city council believes that the phasing policy has been justified by evidence.

Larger rural settlements

Colden Common

Policy CC1 Clayfield Park

1. Would the phasing of development until 2030 be justified by the evidence?

WCC response:

1.33 Policy CC1 is not subject to any phasing requirements in respect of its development – please see paragraph 14.38 of the Local Plan.

2. Given that this site is an existing allocation and has not delivered housing to date, what is the evidence that it will deliver from 2027/28 and within the Plan period?

WCC response:

1.34 The city council continued with the existing allocation of this site on the basis of continued assurances from the owner and the agents of their intention to develop the site for residential use within the plan period.

1.35 An indicative ‘residential phasing plan’ was submitted by the agent in association with a planning application for small commercial building on the site in early 2019 (planning application 18/02847/FUL) that indicated a layout of 48 houses, with the retention of the commercial building proposed in that planning application, in the centre. The plan showed 4 separate areas of residential development, that could be developed in 4 phases between 2021 and 2028. This was considered to be robust evidence for the allocation of the site for 48 dwellings, with development by 2028.

1.36 Whilst residential development has not yet proceeded, there continues to be evidence from the owner and the agent in terms of their commitment to deliver the site within the plan period. The latest correspondence confirming this being an email from the agent on 18.12.24.

1.37 On this basis, it is proposed that the site should now be removed from the first five years of the housing trajectory. However, the council consider that there is sufficient evidence to retain CC1 as an allocation for 48 dwellings to be developed within the plan period and the housing trajectory supplied as Appendix A to the Council’s Statement under Matter 4, has been amended accordingly.

3. Would the policy appropriately address the water supply constraints?

WCC response:

- 1.38 The city council have proactively engaged with Southern Water in relation to water and waste water infrastructure requirements for Policy CC1. The site lies within a groundwater Source Protection Zone (SPZ) source. Criterion v. was added to the policy to ensure that the SPZ is protected and there are no adverse effects on the River Itchen SAC, which is an abstraction source. Therefore, the city council consider that the policy appropriately addresses the water supply constraints.

Policy CC2 Colden Common Farm

1. Would the phasing of development until 2030 be justified by the evidence?

WCC response:

- 1.39 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations, which are not for priority housing, from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).
- 1.40 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.
- 1.41 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

1.42 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

2. Policy CC2 ii requires a site plan. What is meant by this and would it be effective in controlling any impacts on the listed buildings and ensuring suitable access by motorised and active forms of travel?

WCC response:

1.43 In the case of this particular site allocation, given that there are a number of constraints, it is considered to be necessary to ask for a site plan to be prepared. The site plan would be proportionate to issues rather than asking the site promoter to prepare a Concept Masterplan. It would indicate the location of the proposed housing development in relation to areas of open space, screening and the proposed access point(s) and the listed buildings. This is considered to be necessary to ensure that the development is planned in a cohesive fashion and that any potential conflicts between the required elements can be resolved prior to the detailed planning of the layout of the scheme.

1.44 In this case, there are a number of other important factors that need to be addressed before detailed plans can be drawn up for the site. There is the over-riding need to protect and enhance the special qualities of the national park, which has implications for the siting of built development and the provision of screening to minimise impacts.

1.45 Secondly, there is the requirement to respect the setting of the adjacent listed buildings. Again, this will entail screening and has implications for the location and visual impact of built development on the site.

1.46 The Heritage Topic Paper ([SD10f](#)), which has been agreed with Historic England, includes a Heritage Impact Assessment of the Colden Common Farm site allocation.

1.47. The city council consider that a site plan would also enable areas of the site greatest heritage sensitivity (that bordering the garden to the Manor House) to be identified such that development can be focused elsewhere, whilst also allowing space for mitigation measures.

1.48 Finally, another significant issue is the provision of appropriate access by active travel and vehicular modes of travel. The Local Highway Authority have concerns regarding the adequacy of the existing access and have suggested that there may be several possibilities a variety of options for the site. These include the creation of an access via the adjacent development for motorised

and/or active travel. The number and location of access points will have a significant effect on the layout of the development. Given the uncertainty regarding access arrangements, this is another reason for seeking an initial layout, prior to detailed design of the elements of the scheme. We refer the inspector to this policy's supporting paragraphs 14.54 to 14.57 inclusive

1.49 Therefore the city council consider that the requirement for an overall layout plan is important and necessary for the effectiveness of Policy CC2. It will serve a clear planning purpose & will be effective in achieving the aim of balancing all the particular requirements of the policy.

1.50 The city council consider that a site plan would also enable areas of the site's greatest heritage sensitivity (that bordering the garden to the Manor House) to be identified such that development can be focused elsewhere, whilst also allowing space for mitigation measures.

3. Would the proposed development have an acceptable relationship with the SDNP and would policy requirements ensure that its landscape and scenic beauty would be conserved and enhanced? Given site constraints, including the listed buildings and SDNP, would the indicative site capacity be justified by the evidence?

WCC response:

1.51 The site is some distance from the SDNP, with intervening land between the two. There is limited inter-visibility with the SDNP, which can be mitigated by careful consideration of siting of development and provision of screening. The general disposition of this will be determined as part of the overall site plan required by criteria ii) of Policy CC2 discussed above and as also required specifically by criteria viii) of the policy and discussed at 14.58 of The Plan.

1.52 The SDNPA has not raised any concerns regarding this allocation, aside from requesting that the location of the SDNP should be shown in contextual plans for the area, to better assess any impacts on the National Park. In order to ensure that the nearby presence of the National Park is taken account of in the development of proposals, it is suggested that the Plan be amended so that the context of SDNP can be seen. Accordingly, PM122 in the Schedule of Proposed Modifications ([SD14a](#) and illustrated in [SD14b](#)) proposes changes to the site plan and wider context maps of the inset map to show the boundary of the South Downs National Park in relation to CC2.

1.53 It is also important that the Local Plan is read as whole as there are a number of other policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). In view of this, the city council believes that the setting of the settlement would be preserved and the scenic beauty of the SDNP conserved.

- 1.54 The Heritage Topic Paper ([SD10f](#)), which has been agreed with Historic England, includes a Heritage Impact Assessment of the Colden Common Farm site allocation. It concluded that development on this site would affect the significance of the listed buildings, but that any indirect harm could be minimised through a sensitive scheme of development considered as part of the design process. Subject to this, there was no objection to the development of up to 45 dwellings on the site.
- 1.55 The council is proposing a modification PM120 in the Schedule of Proposed Modifications ([SD14a](#)) so that policy CC2 seeks development of 'up to' 45 dwellings, to reflect the concerns raised in the Heritage Topic Paper.
- 1.56 The starting point for the site capacity of this site was the SHELAA which included high level assumptions on the likely density of the site following paragraphs 5.2 to 5.6 of the SHELAA Report. This work was taken forward at a finer level by considering the site constraints, discussing the site with internal consultees (e.g. landscape and heritage) as well as Historic England as outlined above, undertaking a site visit, and from looking at the IIA which has all helped to determine an indicative site capacity.
- 1.57 After taking into account the points that have been outlined above, the city council considers that the site capacity provides a suitable and realistic assessment of the capacity of the site. The design process will demonstrate how the proposal will deliver the site capacity indicated by the policy, whilst respecting the setting of the listed buildings and conserving and enhancing the landscape and scenic beauty of the SDNP.

Policy CC3 Land at Main Road

1. Would the phasing of development until 2030 be justified by the evidence?

WCC response:

- 1.58 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations which are not for priority housing from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).
- 1.59 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no

adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

1.60 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

1.61 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

2. Policy CC2 ii requires a site plan. What is meant by this and would it be effective in controlling any impacts on the setting of Colden Common and the SDNP?

WCC response:

1.62 Policy CC3 ii requires a site plan for this development. In the case of this particular site allocation, given that there are a number of constraints, it is considered to be necessary to ask for a site plan to be prepared. The site plan would be proportionate to issues rather than asking the site promoter to prepare a Concept Masterplan. The site plan would indicate the location of the proposed housing development in relation to areas of open space and screening, the proposed access point(s) and the SDNP is considered necessary to ensure that the development is planned in a cohesive and comprehensive manner and ensure that any potential impacts are fully assessed and mitigated.

1.63 In this case, there are the important factors that need to be addressed before detailed plans can be drawn up for the site. There is the over-riding need to protect and enhance the special qualities of the national park, which has implications for the siting of built development and requires the provision of screening to minimise impacts on views to and from the national park.

1.64 There is also a similar need to minimise wider impacts on the setting of Colden Common itself, which results in a requirement for landscaping to create a new settlement edge to the north of the site and retain a gap to Twyford village.

1.65 The Local Highway Authority have raised concerns regarding the nature and location of access into the site. As access arrangements for the site have not yet been finalised the location and nature of access points will have an effect on the disposition of development on the site, the council consider that the requirement for an overall layout plan is important and necessary for the effectiveness of Policy CC3. It will serve a clear planning purpose & will be effective in achieving the aim of balancing all the particular requirements of the policy, including appropriate control of any impacts on the setting of Colden Common and the SDNP.

3. Would the proposed development have an acceptable relationship with the SDNP and would policy requirements ensure that its landscape and scenic beauty would be conserved and enhanced? Given site constraints, including the listed buildings and SDNP, would the indicative site capacity be justified by the evidence?

1.66 There is intervening land between the site and the SDNP. There is limited inter-visibility with the SDNP, which can be mitigated by careful consideration of siting of development and provision of screening. The general disposition of this will be determined as part of the overall site plan required by criteria ii) of Policy CC3 discussed above and as also required specifically by criteria viii) of the policy.

1.67 The SDNPA has not raised any concerns regarding this allocation, aside from requesting that the location of the SDNP should be shown in contextual plans for the area, to better assess any impacts on the National Park. In order to ensure that the nearby presence of the National Park is taken account of in the development of proposals, it is suggested that the Plan be amended so that the context plan of SDNP can be seen. Accordingly, PM123 in the Schedule of Proposed Modifications ([SD14a](#) and illustrated in [SD14b](#)) proposes changes to the site plan and wider context maps of the inset map to show the boundary of the South Downs National Park in relation to CC3.

1.68 It is also important that the Local Plan is read as whole as there are a number of other policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). In view of this, the city council believes that the setting of the settlement would be preserved and the scenic beauty of the SDNP conserved.

1.69 The starting point for the site capacity of this site was the SHELAA which included high level assumptions on the likely density of the site following paragraphs 5.2 to 5.6 of the SHELAA Report. This work was taken forward at a finer level by considering the site constraints, discussing the site with internal

consultees (e.g. landscape and heritage) - which included undertaking a site visit - and from looking at the IIA which has all helped to determine an indicative site capacity.

1.70 The listed buildings (The Malt House, King Charles Cottage and Yew Tree Cottage) are set well back within their plots on the opposite side of Main Road, across from the site. There is a substantial tree/hedge line between them and the road. Accordingly, this site makes only a small contribution to their significance. The city council believes that sensitive development on this site could be accommodated without undue harm to significance. Criteria ix of the policy requires proposals to preserve their setting. The provision of additional landscaping and buffering to screen that will help to minimize the impact of the development on the setting of the SDNP, will also assist in maintaining the rural setting to the front of the listed buildings.

1.71 There is a need to maintain a visual gap between Colden Common and the village of Twyford to the north and it is noted that the policy seeks 'about' 35 dwellings, which provides some flexibility regarding the exact number. The council therefore considers that there would be potential to revise the layout of development on the site in various connotations as part of the design process and therefore that the capacity proposed by policy CC3 is justified.

Policy CC4 Land adjoining 85 Church Lane

1. Would the phasing of development until 2030 be justified by the evidence?

WCC response:

1.72 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations which are not for priority housing from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).

1.73 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Regulation 19

Local Plan such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

1.74 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

1.75 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

2. Would policy CC4 and its supporting text be effective in controlling development in relation to underground water infrastructure?

WCC response:

1.76 The city council has proactively engaged with Southern Water in relation to water and waste water infrastructure requirements for Policy CC4. Southern Water is progressing an infrastructure project which included a supply pipeline between Havant and Otterbourne. Through previous discussions with Southern Water the land adjoining 85 Church Lane was identified as being located within the preferred corridor, and therefore criterion viii. was included to ensure that Southern Water could gain access to the infrastructure if required. However, Southern Water have now confirmed in the updated WCC and SW Statement of Common Ground ([SD08k](#)) the refined route for the draft Order Limits now entirely avoids the site. The removal of criterion viii. and paragraph 14.80 is proposed (PM124) to address the change to the pipeline route.

3. Given site constraints, including the listed buildings and ancient oak trees fronting Church Lane, would the indicative site capacity be justified by the evidence?

WCC response:

1.77 Keepers Cottage listed building at 94 Church Lane is not adjacent nor directly facing the site. Keepers Cottage is on the opposite side of the road from the site and to its north-west. Policy criteria v) requires development to preserve the setting of Keepers Cottage. The building currently has a rural outlook and

Policy criteria iii) requires that views to the south from the site are maintained by any resulting development. It is therefore considered that the listed building does not represent a constraint on the capacity of the site. The policy requires an arboriculture assessment be undertaken of the trees fronting the site. The council's landscape assessment noted that these trees are large and contribute to the setting of the area, however it is not known if they are ancient oaks and they are not subject to any TPOs.

1.78 The starting point for the site capacity of this site was the SHELAA which included high level assumptions on the likely density of the site following paragraphs 5.2 to 5.6 of the SHELAA Report. This work was taken forward at a finer level by considering the site constraints, discussing the site with internal consultees (e.g. landscape) and from looking at the IIA which has all helped to determine an indicative site capacity. Having undertaken a site visit, the indicative site capacity of Policy CC4 was revised to reflect the character of the frontage development in the vicinity of the site along Church Lane. The policy seeks 'about' 10 dwellings, which provides some flexibility regarding the exact number. The developer has recently submitted an indicative layout to the council which indicates a possible scheme for the development of 9 dwellings. The final capacity will be determined as part of the design process. The site extends some depth from the road and it is considered that this provides scope for a variety of potential layouts, whilst having regard to the limited constraints referred to above.

Denmead

Policy DEN1 Denmead Neighbourhood Plan Designated Area

1. Denmead Parish Council is updating its Neighbourhood Plan at present. When is the Neighbourhood Plan expected to be 'made'? What is the evidence that it will come forward in an appropriate and timely manner?

WCC response:

1.79 The [Denmead Neighbourhood Plan](#) was 'made' in 2015. As the existing Denmead Neighbourhood Plan covers the same period as the adopted Local Plan (2031), the Parish Council confirmed that they would undertake a review of the Denmead Neighbourhood Plan.

1.80 The Parish Council have been progressing with work with the local community on reviewing the Neighbourhood Plan. The Parish Council have assessed various housing sites and are in the process of compiling evidence as part of their review of the existing Neighbourhood Plan. Further details about the

Denmead Neighbourhood Plan Review are available on the [Denmead Parish Council](#) website. This includes all of the work that has been undertaken by Denmead Parish Council in terms of the review of the Neighbourhood Plan and includes an assessment of SHELAA sites, Housing Needs Assessment and the site options document,

2. What is the evidence to justify an approach to designate an additional site/sites in the Neighbourhood Plan? What is the evidence to justify the housing target of 100 additional dwellings and would this ensure that development is directed to the most sustainable settlements?

WCC response:

1.81 Housing allocations in the Local Plan are directed towards the most sustainable settlements in the plan area. The Development Strategy and Site Selection Proposed Submission Plan Topic Paper ([SD10b](#)) sets out the process that the Council followed in identifying the sites allocated in the Local Plan for each settlement. Paragraphs 6.22 and 6.23 of the Topic Paper highlights that there are 15 available SHELAA sites adjacent to the settlement of Denmead with a total estimated capacity of 1,703 dwellings. Each site has been scored against the IIA objectives with the sustainability scores of each site based on the IIA objectives as indicated in paragraphs 5.3 and 5.4.

1.82 Paragraph 6.21 of SD10b identifies five settlements, including Denmead, as a 'larger rural settlement' in a more sustainable location for new development in recognition of the range of services and facilities. As reasonably sustainable locations, these settlements were assessed to consider their potential to deliver some 90-100 homes on new sites over the plan period. Furthermore, the Topic Paper notes that as a reasonably sustainable location there is the potential to deliver 100 dwellings over the plan period based on the sites available in the SHELAA. The city council believes that there are a number of options available in Denmead, and as such there are sufficient sites to meet the housing target of 100 additional dwellings and designate sites in a sustainable location.

3. What is the evidence that there are suitable sites available for designation? Would this approach provide the necessary certainty for the development plan process? In taking this approach would the Plan accord with a Plan led approach?

WCC response:

1.83 Officers are having constructive ongoing engagement with the Parish Council about identifying sites for development and moving the Neighbourhood Plan forward. Paragraph 6.23 of the Development Strategy and Site Selection Proposed Submission Topic Paper ([SD10b](#)) and the Council's response to

question 2 highlights that there are available SHELAA sites which are located adjacent to the settlement boundary in Denmead in order to meet the identified requirement of 100 dwellings. The site assessments in the IIA summarised in the Development Strategy and Site Selection Paper (SD10b) do not result in any particular concerns that sufficient suitable sites cannot be identified for development, and the Council's wider infrastructure and transport work summarised in the Infrastructure Delivery plan ([IN01](#)) and Strategic Transport Assessment ([ST15](#)) has not highlighted any particular concerns with achieving this level of development in Denmead.

1.84 The city council have proactively allocated a figure to the Denmead neighbourhood area in accordance with paragraph 67 of the NPPF. The Parish Council are undertaking a review of the Neighbourhood plan and are in the process of allocating sites in order to meet the strategic policy making authorities housing requirement which would be a plan led approach. The city council have engaged with the Parish Council in relation to the evidence that is required for assessing and allocating suitable sites in the Neighbourhood Plan and has provided the contact details for the various SHELAA sites. The Parish Council have produced a number of documents to gather evidence, including more recently a [site selection document](#). In this respect the city council believe the approach provides the necessary certainty for the development plan process and accords with the plan led approach.

4. What is the justification to phase development delivery until after 2030 and would this be justified by the evidence?

WCC response:

1.85 The city council consider that the phasing of DEN1 for delivery from 2030 is fully justified. The Housing Topic Paper ([SD10g](#)) and the updated Housing Topic Paper ([ED02](#)) provide evidence for the phasing of sites, particularly those that are delivered from 2030 so that nutrient mitigation can be provided, and utilities infrastructure can be upgraded in a planned, systematic manner, preventing the overloading of the electricity grid. Furthermore, paragraph 6.12 – 6.14 of updated Housing Topic Paper (ED02) emphasises that the phasing of sites is effective in that it will maintain a 5-year housing land supply over a longer period to ensure ongoing housing provision.

5. If the Neighbourhood Plan was not made in a timely manner, how would the housing shortfall be made up? Extant Neighbourhood Plan allocations have yet to deliver what is the evidence that they will deliver in the Plan period (28 dwellings)?

WCC response:

1.86 The city council believe that given the amount of evidence prepared by the Parish Council to date there is every expectation that a Neighbourhood Plan

will be progressed in a timely manner and there is no reason that a shortfall will need to be made up. However, if this were to occur a review of the Local Plan, which will include sites allocated, has been timetabled in the interim Local Development Scheme ([ED16](#)).

1.87 The Denmead Neighbourhood Plan 2011-2031 allocates land off Tanners Lane for 18 dwellings and Land off Anmore Road for 10 dwellings to be delivered in the period up until 2031. Appendix A of the Housing Topic Paper update (ED02) highlights that both schemes are anticipated to be delivered between 2027 to 2030. If for any reason the Denmead Neighbourhood Plan does not progress, any housing shortfall would be addressed in the early review of the Local Plan.

6. Should policy DEN1 address off site infrastructure needs? Would it be necessary for the purposes of soundness to address the requirement to liaise with water and waste water providers?

WCC response:

1.88 The city council have proactively engaged with a number of infrastructure providers in the process of preparing the plan including the ICB and Southern Water. The Council consider it necessary to address the offsite infrastructure needs proposed by the ICB and Southern Water in their Regulation 19 consultation response. The Council propose additional wording to the supporting text in PM125 in the Schedule of Proposed Modifications ([SD14a](#)) for Policy DEN1 to reflect the comments made by Southern Water in relation to the requirement to liaise with water and waste water providers.

1.89 Furthermore, the city council propose PM126 in the Schedule of Proposed Modifications ([SD14a](#)) to bullet point ii. of the policy to reflect the comments made by the ICB in relation to infrastructure requirements.

Kings Worthy

Policy KW1 Cornerways and Merrydale

1. As this is a brownfield site would Policy KW1i be necessary?

WCC response:

1.90 The Cornerways site in Kings Worthy is currently occupied by a derelict building and in accordance with the city council's priority on brownfield sites it has been allocated for development. There is no particular restriction to the phasing of the site and criterion i in Policy KW1 is intended to make this clear. Should the Inspector consider that this criterion is not necessary it could be relocated as a statement within the supporting text.

2. What is the justification for the allocation of this site for 45 dwellings or equivalent and would that be justified by the evidence?

WCC response:

1.91 The SHELAA ([HA04](#)) and paragraph 6.25 of the Development Strategy and Site Selection Topic Paper ([SD10b](#)) highlighted that the Council considered it appropriate to allocate 100 dwellings for Kings Worthy, including the allocation of 45 dwellings at Cornerways and Merrydale. KW1 is also promoted on the Council's [brownfield land register](#) which provides a list of brownfield sites across the district that are suitable for residential development.

1.92 Since the site was allocated for general residential use in the Regulation 18 Local Plan, its owner Hampshire County Council has agreed funding to bring forward the site for a new care home. On the 25 May 2024 Hampshire County Council ([HCC](#)) agreed a paper for transforming adult social care and improvements to older persons' housing through the modernisation of care and support. Within this report was the future use of the Cornerways site in Kings Worthy for a care home of 80-100 beds (paragraphs 54-56). On the 26 November 2024 [HCC](#) agreed the outcome of the Care home Investment Programme and the plans for the Cornerways site. This investment programme involved a HCC capital investment programme to building three purpose built new care homes (one on the Cornerways site).

1.93 A care home of 80-100 beds would equate to 44-56 dwelling equivalents (using a conversion factor of 1.8:1). Hence the site capacity is likely to be similar to, or higher than, the SHELAA estimated capacity for general housing (45 dwellings). The Hampshire County Council report is clear that there has been feasibility and design work to test the capacity of the site. The city council therefore consider that the allocation of Policy KW1 for 45 dwellings is fully justified by the evidence.

3. Given the site's heritage constraints, would the indicative site capacity be justified by the evidence? What is the evidence to justify delivery of this site from 2027/8?

WCC response:

1.94 The Conservation Area is located approximately 40 metres to the southeast of the site. The nearest listed building (Old Thatch) is located approximately 100 metres to the southeast of the site. The intervening development between the Conservation Area and surrounding the proposed allocation site is mid C20 in date. Presently, the site is not readily appreciable from the Conservation Area. Accordingly, the site makes a neutral contribution to the significance of the conservation area and to the significance of Old Thatch. Discussions have

taken place with internal departments and Historic England and no objections have been raised to accommodating development at the Land at Cornerways and Merrydale. Therefore, the Council consider that the indicative site capacity is justified by the evidence.

1.95 On the 26 November 2024 [HCC](#) agreed the outcome of the Care home Investment Programme including the plans for development at the Cornerways site. The various Hampshire County Council reports show that there has been feasibility and design work on this proposal and that it is now programmed. Paragraph 16 of the November 2024 report and discussions with the site promoters indicate that the site will not become fully operational until at least late 2027, hence the trajectory has been updated to show the delivery of the site in 2028/29 - 2029/30 as highlighted in Appendix A of the Housing Topic Paper Update ([ED02](#)).

Policy KW2 Land adjoining the Cart and Horses PH

1. Would the phasing restriction set out in Policy KW2i be necessary?

WCC response:

1.96 Criterion (i) of the policy does not refer to phasing, this is contained in criterion (ii). The Council considers that the phasing restriction in criterion ii) of KW2 is necessary to ensure that development does not come forward until the junction improvements are complete as this is required to enable a safe form of access to be provided. The junction has been subject to modifications in the past to address road safety concerns and Hampshire County Council have recently consulted on a more holistic improvement scheme to the junction to address ongoing safety concerns. Hampshire County Council's Capital Programme of provisional schemes (Universal Services Decision Day)^[1] was approved in January 2025 and includes the Cart and Horses junction as referenced in criterion ii) of Policy KW2.

2. Given the site's significant heritage and tree constraints, and proximity to the SDNP, would the indicative site capacity of 45 dwellings or equivalent be justified by the evidence? What is the evidence to justify delivery of this site from 2030/31?

WCC response:

1.97 There are a number of constraints on the site and discussions have been held with the site promoters on development options. In order to clarify these, the site promoter applied for Pre-Application advice, focusing particularly on trees

^[1] [Universal Services Proposed Capital Programme 2025/26, 2026/27 and 2027/28 and 24/25 Q3 Update-2025-01-20-ELMUS Decision Day](#) (page 10)

and biodiversity and keeping the proposed development generally in the open north-eastern part of the site.

- 1.98 While such advice is confidential, the site has been reviewed by internal officers, including the Council's Tree Officers. Advice was also given on ecology, biodiversity net gain, heritage and landscape. In the light of this advice from the pre-app discussion it is understood that the site promoter has prepared several masterplan options and undertook viability testing, looking at different ways of developing the site while protecting the key constraints on and around the site.
- 1.99 From a tree survey that has been undertaken by the site promoters this has identified that there are a significant number of trees on the site which do not merit long term retention, which may mean that there is some potential scope for development in other parts of the site. At the moment the plans, which may be subject to further change, are based on an older persons' housing development of 80 apartments and 3 bungalows which produces a viable development that makes provision for substantial contributions for biodiversity net gain and the Cart and Horses junction improvement.
- 1.100 Accordingly, it is considered by the city council that an adequate assessment has been undertaken in terms of site constraints and opportunities to satisfy the council and site promoter that at least the scale of development envisaged can be accommodated and would be viable. Rather than include excessive detail as to the location or form of development, which could constrain future design options, policy KW2 requires the production of a masterplan. This would ensure that the form of this development and its associated infrastructure would respond sensitively to the various constraints, including trees, the SDNP, the nearby conservation areas and the Cart and Horse PH. PM128 proposes a modification to the Local Plan policies map in the Schedule of Proposed Modifications ([SD14a](#)) to acknowledge the South Downs National Park in the allocation and inset maps.
- 1.101 It is noted that the site promoter in their Regulation 19 representation has suggested that the indicative capacity of the site should be increased to a figure of 120 dwellings (or equivalents). While the Council accepts that there may be scope to increase the capacity of the site, the only indicative masterplan it has in principle supported development on this site for 83 dwellings or equivalents. In the absence of a suitable alternative the Council is reluctant to agree an increase, although accepts that a figure of 80-85 dwellings or equivalents is likely to be achievable. Therefore, bullet point i) is necessary as the masterplan will be submitted to the Council prior to planning approval which will establish principles for the disposition of uses.
- 1.102 The city council consider that the phasing of KW2 for delivery from 2030 is fully justified, given the proactive approach of the site promoter which supports the allocation. While the site is not held back by policy H2, it should not be developed in advance of the improvements proposed for the Cart and Horses junction.

3. Would the policy, as a whole, be effective in safeguarding the significance of heritage assets?

WCC response:

- 2.1 The site is in close proximity to two Conservation Areas (Abbots Worthy and Kings Worthy) and several listed buildings. Given the proximity of the site to these heritage assets criterion viii) requires that proposals are designed to protect important views of the conservation areas and listed buildings. The Council refer to criterion i. – requiring a masterplan, and the emphasis given to protecting important trees which provide screening for the listed buildings and conservation areas, in criterion vii and viii. In addition, Historic England provided further comments on the reference to the setting of the conservation areas and listed buildings in their response to the Proposed Submission Local Plan (Regulation 19). As a result, the Council propose a modification PM127 in the Schedule of Proposed Changes ([SD14a](#)) amending the supporting text of policy KW2 to strengthen the wording in relation to the setting of the heritage assets.
- 2.2 The Council considers that the policy as a whole is effective in safeguarding the significance of the heritage assets.

Swanmore

Policy SW1 The Lakes

1. What is the status of the Swanmore Village Design Statement? How has it informed the approach to Swanmore and policy SW1?

WCC response:

- 2.3 The Swanmore Village Design Statement (VDS) is a Supplementary Planning Document adopted by the Council in 2019, as supplementary to the Local Plan (Parts 1 and 2). The Swanmore Village Design Statement ([VDS08](#)) forms part of the Evidence Base for the Local Plan.
- 2.4 This site was allocated in the adopted in Winchester Local Plan Part 2 (Policy SW1 allocated the site for 140 dwellings). As part of the site has not yet been developed, the remainder of this site allocation was carried forward to the Proposed Submission Local Plan (Regulation 19) (it has the same policy number SW1 in the Proposed Submission Local Plan (Regulation 19)).
- 2.5 Policy D4 in the adopted Winchester Local Plan Part 2 requires proposals to take account of the VDS within the Market Towns Rural Areas of the Plan.

- 2.6 The Swanmore Village Design Statement was prepared around the same time as the Winchester Local Plan Part 2 was being drafted. This meant that the development of the site was able to be undertaken in parallel with the evolution of the plan's approach to Swanmore. The Village Design Statement remains a material consideration for proposals for this area and nothing has changed in this respect.
- 2.7 The key elements of developing a green corridor and a series of linked open spaces throughout the site and linking into the wider area, are common threads of Policy SW1 and the Swanmore Village VDS.
- 2.8 Another key element is the aim to create a suitable settlement edge to the south-west of the village and maintain the gap between Swanmore and Waltham Chase. As this is an important requirement it has been included in criteria iv of Policy SW1 in the Proposed Submission Local Plan (Regulation 19).
- 2.10 Allied to this, the overall desire to seek to retain the character and setting of the village in respect of the surrounding constraints of SDNP and the local gap, which seeks to maintain separation between Swanmore and the nearby settlements of Bishops Waltham to the north, Waltham Chase to the west and Shedfield to the south-west. However, given that Swanmore is a sustainable settlement the undeveloped part of this site is still considered to be suitable for development.
- 2.11 It is also clear from the planning applications that have occurred on the SW1 allocation area Land off of New Road (19/02421/FUL) and land at Belmont Farm (21/03119/FUL) that consideration of the VDS has formed part of the assessment of proposals.

1. Would the approach to Swanmore, in terms of its place in the settlement hierarchy be justified by the evidence?

WCC response:

- 2.12 Swanmore was assessed as part of the Settlement Hierarchy Review 2022 and was considered to fall within the category of being a Larger Rural Settlement given the range of services and facilities present. As reasonably sustainable locations, these settlements were assessed to consider their potential to deliver some 90-100 homes on new sites over the plan period. Paragraph 6.37 of the [Development Strategy and Site Selection Paper \(SD 10b\)](#) outlines how the sites adjacent to Swanmore were considered. The document details how the constraints in this location, particularly the settlement gap, have led to the conclusion that no further allocations can be made in this area at this time. Further details on the approach that was taken to the settlement have been included in Matter 2 (Spatial Strategy and distribution of development).

2. Would Policy SW1 effectively address the needs for offsite infrastructure?

WCC response:

2.13 The city council have proactively engaged with a number of infrastructure providers in the process of preparing the Local Plan including the Integrated Care Board and Hampshire County Council. It is considered to be necessary to address the offsite infrastructure needs proposed by the ICB in their Regulation 19 consultation response. PM129 in the Schedule of Proposed Changes ([SD14a](#)) has amended criterion vii in order to reflect the comments that were made by the ICB.

2.14 The city council are also aware that other financial contributions, may be required to address off site infrastructure. In this regard criterion vii, deals with any further contributions for infrastructure to ensure that the development is acceptable. The Council considers therefore that Policy SW1 effectively addresses the needs for offsite infrastructure.

Wickham and Knowle

1. Is modification to the introductory text required to removed reference to policy WK2?

WCC response:

2.15 The city council believes that PM130 and PM132 in the Schedule of Proposed Modification ([SD14a](#)) which remove the policy reference are justified as Land at the Glebe (which was Policy WK2 in the Regulation 18 Local Plan) was not included in the Proposed Submission Local Plan (Regulation 19) as the site has now been built out.

2. What is the justification for a change to the settlement boundary and would it represent a consistent application of the settlement boundary methodology?

WCC response:

2.16 Yes. Please see response to question 4 in matter 2 (Spatial strategy and distribution of development) that outlines the city council's approach towards amending settlement boundaries. It is considered that there is a justification for a change to the settlement boundary as the selection process was informed by Wickham Site Selection Background Paper ([SD10j](#)). This document assessed the six sites which were put forward by developers/landowners as part of the 'Call for sites' which were adjacent to the settlement boundary of Wickham. This work was also informed by the IIA and landscape assessment, the accessibility of sites along with the opportunity for walking and cycling to local

facilities. In view of this, the city council believes that the justification for the change to the settlement is consistent with the settlement boundary methodology.

Policy WK1 Winchester Road housing and open space allocation

- 1. The most recent AMR indicates that this site is under construction. The housing trajectory includes a remaining balance of 17 dwellings to be delivered in 2024/25? What is the status of the site and if built out, would its inclusion in the Plan be justified, effective, and consistent with national policy? Has it been occupied in accordance with policy WK1x?**

WCC response:

2.17 The city council accepts that there are 17 dwellings to be completed on the site, and they are expected to be delivered in 2024/25. The open space has not yet been delivered in Mill Lane. In this respect, in order to ensure that this development is delivered in a coherent way it is considered appropriate to retain Policy WK1 in order to ensure that this is delivered. The housing component of this site allocation has been delivered in consultation with the sewage infrastructure provider.

- 2. Policy WK1vii requires sports pitches to be provided on land at Mill Lane. Given that this element of the development has not been delivered, what is the evidence to justify this requirement?**

WCC response:

2.18 The Winchester City Council Playing Pitch Strategy and Action Plan (April 2018) ([RL02](#)) identified a shortfall of pitches including football would arise by 2031 in the southern part of the district.

2.19 Discussions are ongoing with the Parish Council about the affordability of the sports pitches. Therefore, it is considered appropriate to recognise this in the Plan and introduce some flexibility in the policy. Proposed Modification PM134 seeks to allow for other forms of suitable open space to be provided at Mill Lane, making the policy more effective. Proposed Modifications PM131 and PM133 make further consequential amendments to the Plan.

- 3. What is the evidence to justify provision of open space at Mill Lane?**

WCC response:

2.20 The WCC Open Space Assessment (RL01) finds a shortfall in the quantity of open space in Wickham and Knowle Parish (page 67). The provision of sports pitches and associated open space at Mill Lane was envisaged to come forward in line with the residential development but has not yet been completed. There are ongoing discussions with the Parish Council on this matter surrounding the affordability and need for the sports pitches and pavilion originally proposed, and therefore it is considered appropriate to provide more flexibility in the type of open space which is provided in this location – but there remains an overall need for additional open space which this site will address. Proposed Modification PM134 seeks to allow for other forms of suitable open space to be provided at Mill Lane, making the policy more effective. Finally, Proposed Modification PM 135 is proposed to include the boundary of the National Park in the allocation and inset maps to provide clarity.

Policy WK3 Welborne Open Space

1. Would the title of this policy be misleading?

WCC response:

2.21 No. The Welborne Garden village, which is currently under construction, is located in Fareham Borough Council administration area. The purpose of this policy is to provide a framework for delivering Welborne in an appropriate manner which it is an important strategic cross boundary site with Fareham Borough Council. An essential element of this cross boundary agreement involves providing an area of open space between the settlements of Wickham and Knowle. It is not envisaged that the built development of Welborne will extend into Winchester District.

2. In seeking to retain the open nature of the landscape that separates Welborne Strategic Development Area and the existing settlements of Knowle and Wickham would the policy be effective and justified by the evidence?

WCC response:

2.22 Please see response to question 1. The allocation of the 6,000 homes at the Welborne Garden village in the Adopted Fareham Borough Council Local Plan is based on a comprehensive evidence base including the Welborne Plan, viability assessment and transport assessments. This information accompanied the [planning application](#) that was granted planning permission by Fareham Borough Council on 30 September 2021. At present, it is considered there is an ongoing need to retain this policy until the development of Welborne is complete to ensure that, should further planning applications come forward which revised the disposition of uses within Welborne, there is an appropriate policy in place.

3. How would those requirements relate to Plan policy NE7

WCC response:

2.23 Policy NE7 (settlement gaps) specifically mentions the Knowle, Wickham and Welborne settlement gap so in this respect the city council believes that Policy WK3 compliments policy NE7 and it is important to read the Local Plan as whole.

Policy WK5 Mill Lane

1. What is the evidence to justify this allocation which sits beyond the existing settlement boundary? Would it ensure that the rural setting of the settlement was preserved and the scenic beauty of the SDNP conserved?

WCC response:

2.24 Yes. There is a justification for a change to the settlement boundary as the selection process was undertaken in line with the process set out in the Development Strategy and Site Selection Topic Paper ([SD10b](#)) and the Wickham Site Selection Background Paper ([SD10j](#)). This document assessed the six sites which were put forward by developers/landowners as part of the 'Call for sites' which were adjacent to the settlement boundary of Wickham. This work was also informed by the IIA and landscape assessment, the accessibility of sites along with the opportunity for walking and cycling to local facilities. In view of this, the city council believes that the justification for the change to the settlement is consistent with the settlement boundary methodology.

2.25 This site was assessed for its landscape sensitivity in 2020. This found that whilst the site is visually prominent in views from Mill Lane and the landscape to the north of the village makes a significant contribution to the distinctive character and rural setting of the village, some modest residential development wouldn't substantially alter the scale and character of the surroundings and the wider setting, due to the site being well contained and lower down in the wider landscape than adjacent SHELAA sites further north (WI06, WI07 & WI11).

2.26 Paragraph 14.117 and criterion vii in Policy WK5 would ensure that the rural setting of the settlement is preserved. It is also important that the Local Plan is read as whole as there are a number of other policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). In view of this, the city council believes that rural setting of the settlement would be preserved and the scenic beauty of the SDNP conserved. Proposed Modification PM138 is suggested to ensure the approach

to landscape buffers protects the setting of the SDNP, and PM139 includes the boundary of the SDNP in the allocation and inset maps to provide clarity.

2. Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals? In particular would policy WK5ii and WK5v together be effective in seeking direct, safe and lit active travel links to the surrounding area? Would they provide appropriate flexibility?

WCC response:

2.27 Broadly, yes. The city council considers that the policy has been clearly written and unambiguous and it is evident how a decision maker should react to development proposals. It is important that the Local Plan is read as a whole as there is a separate topic and range of policies on sustainable transport and active travel. When these policies are read together, along with criterion ii and criterion v of Policy WK5, they would ensure that the design of the development would need to demonstrate direct, safe and lit active travel links to the surrounding area. This issue is, in part, also covered by Policy D1 (high quality, well designed and inclusive places) and the design process that the city council wants all planning applications to go through.

2.28 With regards to criterion v, it is considered appropriate to revise the wording in accordance with Proposed Modifications PM136 and PM137 to retain flexibility in how pedestrian links may be delivered, making the policy more effective.

3. Would policy WK5ix provide adequate flexibility to accommodate the most suitable technical solution?

WCC response:

2.29 The wording of criterion ix in Policy WK5 was included at the specific request of the Local Lead Flood Authority (LLFA) in recognition that there is a minor overflow route to the southwest of the site. As part of the design process, the applicant would need to demonstrate how the design/layout of the site did not exacerbate the history of flooding on Mill Lane. The technical solution, in terms of how this could be addressed, would need to be addressed by the applicant by working collaboratively with the LLFA.

4. Would the requirements for offsite infrastructure be clear and unambiguous?

WCC response:

2.30 The city council have proactively engaged with a number of infrastructure providers in the process of preparing the Infrastructure Delivery Plan ([IN01](#)) including the ICB and Hampshire County Council.

2.31 The city council believes that any necessary ICB and HCC contributions would be covered under criterion xxii (sewerage) and criterion xiii (infrastructure) in Policy WK5.

5. Policy WK5i includes a phasing restriction. What is the robust evidence to justify this approach?

WCC response:

2.32 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations, which are not for priority housing, from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).

2.33 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

2.34 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

2.35 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

6. Given site constraints, including traffic impacts, parking, public rights of way, proximity to the SDNP, what is the evidence that the site would be delivered in the Plan period? Given those constraints what is the viability evidence to justify its delivery?

WCC response:

2.36 It is accepted that like many other sites there are constraints which the supporting text and the criterion in Policy WK5 has identified. The city council believes that it is important to read the Local Plan as a whole as there are a number of policies in the Sustainable Transport and Active Travel topic that deal with traffic impacts, Public Rights of Way, Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). In view of this, the city council believes that rural setting of the settlement would be preserved and the scenic beauty of the SDNP conserved. PM139 in the Scheduled of Proposed Modifications ([SD14a](#)) has a proposed modification to include the boundary of the South Downs National Park.

2.37 The Local Plan Viability evidence (see documents LPV01 – LPV18) has tested a range of high-level residential development typologies reflecting the Council's emerging site supply, as appropriate for the study purpose. The Viability Study reflects and is consistent with the National Planning Practice Guidance (PPG) which confirms individual testing of every site is not required and the use of site typologies to determine viability at the plan making stage is appropriate.

2.38 The range of residential typologies tested includes 30 Houses and 50 Mixed (Houses/Flats) on greenfield land which can be broadly aligned to the site allocation at Mill Lane. We consider the study allowances made in respect of site wide infrastructure and planning obligations are sufficient for the study purpose. The assumptions used are set out in Appendix 1 ([LPV05](#)). Based on the study findings, the Mill Lane site is likely to be deliverable from a viability perspective. However, taking into account the necessary high-level nature of the study, not all potential eventualities and individual scheme circumstances can be covered as part of the assessment. Overall, the Viability Study made reasonable assumptions, based on adequate, proportionate and up to date evidence about meeting the costs of all the plan policy requirements and other relevant national standards.

Policy WK6 Land at Southwick Road/School Road

1. Would the policy title appropriately describe the proposed allocation?

WCC response:

2.39 PM140 in the Schedule of Proposed Modifications ([SD14a](#)) renames the Policy to Land at School Road. This is because the northern boundary of the allocated site does not extend to Southwick Road.

2. What is the evidence to justify this allocation which sits beyond the existing settlement boundary? Would it ensure that the rural setting of the settlement was preserved and the scenic beauty of the SDNP conserved?

WCC response:

2.40 Yes – there is a justification for a change to the settlement boundary as the selection process was undertaken in line with the process set out in the Development Strategy and Site Selection Topic Paper ([SD10b](#)) and the Wickham Site Selection Background Paper ([SD10j](#)). This document assessed the six sites which were put forward by developers/landowners as part of the ‘Call for sites’ which were adjacent to the settlement boundary of Wickham. This work was also informed by the IIA and landscape assessment, the accessibility of sites along with the opportunity for walking and cycling to local facilities. In view of this, the city council believes that the justification for the change to the settlement is consistent with the settlement boundary methodology.

2.41 Paragraph 14.117 and criterion vii in Policy WK6 would ensure that the rural setting of the settlement is preserved. It is also important that the Local Plan is read as whole as there are a number of other policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). Proposed Modification PM144 expands criterion vi to clarify the role that landscaping will have in protecting the setting of the SDNP, and Proposed Modification PM145 includes the boundary of the SDNP in the allocation and inset maps to provide clarity. In view of this, the city council believes that rural setting of the settlement would be preserved and the scenic beauty of the SDNP conserved.

3. Policy WK6i includes a phasing restriction. What is the robust evidence to justify this approach?

WCC response:

2.42 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations which are not for priority housing from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).

2.43 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour

of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

2.44 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

2.45 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

4. Given site constraints, what is the robust evidence to justify its delivery in the Plan period?

WCC response:

2.46 It is important to read the Local Plan as a whole as there are a number of policies in the Sustainable Transport and Active Travel topic that deal with traffic impacts, Public Rights of Way, Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE5 (Biodiversity), Policy NE8 (South Downs National Park) and Policy NE9 (Landscape Character). In view of this, the city council believes that rural setting of the settlement would be preserved and the scenic beauty of the SDNP conserved.

2.47 In this particular case, the site promoter submitted a planning application 24/02803/FUL for 60 dwellings. Whilst this planning application was refused planning permission this was on the grounds that this is greenfield site that is phased in the Proposed Submission Local Plan (Regulation 19) to not come forward until 2030 rather than on matters of principle. It is understood that the applicants have now submitted an appeal. This clearly demonstrates that the site promoters believe that this site is deliverable and are keen to bring the site forward this site as soon as they are able to.

5. Would Policy WK6 provide effective protection for any archaeological remains present?

WCC response:

2.48 The proposed revised wording to supporting paragraph 14.126 suggested by Historic England and set out in Proposed Modification 141 is supported.

2.49 Archaeological excavations undertaken in advance of the adjacent housing development, whilst locating a significant quantity of archaeological remains relating to Roman roadside settlement, did not locate any remains of national significance and further found that deposits relating to the Roman road survived in only a degraded state.

2.50 Similar archaeological remains in terms of their nature and survival are predicted on this allocation site, which has been borne out by the results of a recent geophysical survey and limited evaluation trenching undertaken in connection with a pre-application enquiry.

2.51 Further to results of these archaeological investigations, no remains of likely national significance are anticipated at this site, however the revised wording highlights the need to consider archaeology at an early stage in the design and application process.

2.52 Accordingly, it is considered that the re-worded Policy and supporting text together with the provisions set out in Chapter 16 of the NPPF (paragraph 194 - 195) will ensure that archaeology at this site is conserved appropriately.

6. Would policy WK6xiii in phasing occupation of development to align with delivery of sewage infrastructure, be justified, effective and consistent with national policy? Would it effectively protect underground water infrastructure.

WCC response:

2.53 The city council have proactively engaged with a number of infrastructure providers in the process of preparing the plan including Southern Water. Southern Water, as part of their engagement with the Council, assessed the capacity of public sewer networks that would serve each site allocation, including WK6. The assessments highlighted that a connection to the sewer network at WK6 could lead to an increased risk of sewer flooding, unless network reinforcement work is delivered at the rate of occupancy. Criterion xiii) was included as a result of the advice and in line with paragraph 124 c) which states that 'planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed'. The Council therefore

consider that criterion xiii) is justified, effective and consistent with national policy acting as a mechanism to protect underground infrastructure.

2.54 However, responses received from Southern Water have highlighted the need to safeguard future access to existing sewerage infrastructure for maintenance and upsizing purposes. Therefore, Proposed Modification PM142 sets out an additional criterion xv to secure those aims.

Policy KN1 Ravenswood/Knowle

1. What is the robust evidence to justify the location of this allocation, given its siting with a settlement gap? How would the policy ensure that the open character of the settlement gap is not compromised?

WCC response:

2.55 Policy KN1 (Ravenswood/Knowle) was a community led planning application that was submitted by Homes England for 200 houses (18/01612/OUT). The planning application has progressed to the point of signing of a S106 Agreement.

2.56 As indicated in paragraph 14.130 in the Proposed Submission Local Plan (Regulation 19), as this was a community led planning application it was assessed under the adopted Local Plan policy MTRA 3 (Market Towns and Rural Areas) in the adopted Local Plan. At the time of assessing the planning application there was a range of associated documents that demonstrated that the development would secure a larger area of open space that would be safeguarded from development which was assessed as part of the planning balance. The city council recommended that planning permission be granted for the community led planning application. A key component that resulted in the recommendation to grant planning permission was that the open character of the settlement gap would not be compromised as part of the proposed development. It is understood that the signing of the S106 agreement is reaching an agreement. Wickham and Knowle Parish Council have not yet signed the S106 agreement but if agreement cannot be reached with the Parish Council regarding the management of the open space, Homes England could look towards another provider.

2. Would the policy requirements effectively mitigate harmful impacts on European sites? In this regard, would the policy be effective?

WCC response:

2.57 In response to the representations that were submitted by Natural England at the Regulation 19 stage the Council has continued to work proactively with

Natural England in relation to any potential harmful impacts of allocated sites on Designated Habitats Sites. Natural England raised a number of matters at the Regulation 19 stage which were not considered to be soundness issues but would ensure completeness and clarity. This included preparing an updated assessment in the HRA to determine whether any allocation policies fall within the 15km zone of influence for New Forest Recreational Disturbance. In response to Natural England's comments on the Regulation 19 consultation an addendum to the HRA was produced ([SD04a](#)). The positive engagement with Natural England is confirmed in the updated Statement of Common Ground with Natural England ([ED19](#)).

2.58 PM148 in the Schedule of Proposed Modifications ([SD14a](#)) includes the addition of a new criterion to Policy KN1 to include reference to the Green Infrastructure Strategy in relation to addressing and mitigating the impacts of recreational disturbance on the SPA/Ramsar sites. It is also important to read the Local Plan as a whole as there are a number of other Local Plan policies (e.g. Policy NE16) that address the impact on SPA/Ramsar sites.

3. Would the policy requirements at KN1ix provide appropriate flexibility, in relation to sewerage and water connection given the number of providers in the locality?

WCC response:

2.59 It is possible that the development may be served by more than one water infrastructure provider. Following comments received from Homes England as site promoter, Proposed Modification PM147 is proposed to provide appropriate flexibility.

Intermediate Rural Settlements

Hursley

Policy HU1 Neighbourhood Plan Designated Area

1. The Plan states that it is expected that there is capacity for the development of about 20 dwellings in Hursley either through allocations in the emerging Neighbourhood Plan or windfall. Is this approach justified by the evidence? Would this approach result in a Plan led approach?

WCC response:

2.60 The city council confirmed on the [15 January 2021](#) to Hursley Parish Council the Neighbourhood Area for the purposes of preparing a Hursley

Neighbourhood Plan. The boundary of the Neighbourhood Plan coincided with the parish boundary.

2.61 The [2023 SHELAA](#) identified five sites adjacent to the settlement with a total estimated capacity of 117 dwellings.

2.62 Hursley is assessed as an intermediate settlement in the Development Strategy and Site Selection Proposed Submission Plan Topic Paper ([SD10b](#)), with a moderate level of services and facilities. Hursley has been added to this level of the hierarchy following a reassessment of the hierarchy, so was not originally given a housing target. It is estimated that a further 20 dwellings will come forward either as windfall or through the outcome of the Neighbourhood Plan process. The Parish Council have confirmed that they are in the early process of preparing a Neighbourhood Plan.

2.63 On 27 November 2024 officers attended a site visit with members of the Parish Council. 5 SHELAA sites were visited that are located immediately surrounding the settlement of Hursley: HU06, HU08, HU09, HU10 and HU13. Following this in January 2025, the Parish Council agreed and published on their Parish Council website a [Site Assessment Report \(ED22\)](#). This Report included an assessment of the SHELAA sites and included conclusions and recommendations on which sites were suitable for development. This Site Assessment Report was agreed by Hursley Parish Council at the end of January 2025. A number of sites have already come forward as windfall and therefore these make a positive contribution to the 'about 20 dwellings' expressed in Policy HU1.

2. Hursley Parish Council is updating its Neighbourhood Plan at present. When is the Neighbourhood Plan expected to be 'made'? What is the evidence that it will come forward in an appropriate and timely manner?

WCC response:

2.64 As indicated in response to question 1, Hursley Parish Council have now agreed which SHELAA sites they consider to be the preferred sites at this stage.

2.65 According to the Parish Council, although at an early stage the Neighbourhood Plan is making progress with evidence gathering to be followed by draft proposals and a public The Parish Council anticipate the Neighbourhood Plan to be 'made' in 2026.

3. What is the evidence to justify the housing target of 20 additional dwellings and would this ensure that development is directed to the most sustainable settlements?

WCC response:

2.66 In the case of Hursley, the Parish Council had requested designation of the Neighbourhood Plan area in November 2020 and the City Council agreed this by letter dated 15 January 2021. This was before the Strategic Issues and Priorities consultation document (February 2021, [CON05](#)), so the spatial development strategy for the new Local Plan had not been determined. Therefore, the Council's designation letter referred to the extant Local Plan at the time: *'under the current strategic policies there are no specific requirements for housing or other development in Hursley Parish'*. As set out in the Development Strategy and Site Selection Proposed Submission Topic paper ([SD10b](#)), Hursley is assessed as an intermediate settlement in the 2024 Settlement Hierarchy, with a moderate level of services and facilities and is considered to be a sustainable settlement. The 2023 SHELAA identified five sites adjacent to the settlement with a total estimated capacity of 117 dwellings. Each site was assessed against the sustainability criteria set out in the Integrated Impact Assessment (IIA). Hursley has been added to this level of the hierarchy following a reassessment of the hierarchy, so was not originally given a housing target. It is estimated that a further 20 dwellings will come forward, either as windfall or through the outcome of the Neighbourhood Plan process which is currently underway. According to the Parish Council, development is likely to be located around the edge of the settlement of Hursley Village. If for any reason the Neighbourhood Plan does not progress, any housing shortfall would need to be addressed in the early review of the Local Plan.

4. What is the evidence that there are suitable site/s available for designation? Would this approach provide the necessary certainty for the development plan process? If they are greenfield sites would they be subject to a phasing restriction?

WCC response:

2.67 The city council believes that there are options available in Hursley to meet the 20 dwellings and is having constructive ongoing engagement with Parish Council about identifying sites for development. If they are greenfield sites they would be subject to the phasing policy.

Otterbourne

Policy OT01 land East of Main Road

1. Housing need in Otterbourne is proposed to be met through an allocation in this Plan, windfall and net completions in or adjoining the settlement. In this respect would the Plan be positively prepared and robustly justified by the evidence?

WCC response:

2.68 Yes, the Plan has been positively prepared and is robustly justified by the evidence. The Settlement Hierarchy Review (DS01) scored Otterbourne as an intermediate settlement in the 2024 Settlement Hierarchy, with a moderate level of services and facilities. The allocation is in a sustainable location and is adjacent to the existing residential area and within 10 minutes walking distance to shops, pubs, primary school, football pitch and open space.

2. Policy OT01i includes a phasing restriction. Would this be justified by the evidence?

WCC response:

2.69 As this is a greenfield site a phasing restriction has been put in place for this site to come forward post 2030. Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations, which are not for priority housing, from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).

2.70 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

2.71 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

2.72 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a

significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

3. Would the policy as submitted, ensure the archaeology on the site is conserved appropriately?

WCC response:

2.73 PM 149 in the Schedule of Proposed Modifications ([SD14a](#)) has a new criterion to Policy OT01 that was suggested by Historic England to ensure that archaeology on the site is conserved appropriately.

2.74 A geophysical survey undertaken within the site in 2016 did not locate any clear evidence for the Roman road, although some sub-surface anomalies (not certainly archaeological in origin) identified by the survey could possibly relate to this and potential associated roadside remains. Equally however the sub-surface anomalies could relate to former sand pit and sand extraction on the site. This extraction activity may have adversely affected buried remains of the Roman road, if present on the predicted alignment.

2.75 The revised wording highlights archaeological considerations to prospective developers (both evaluation and the subsequent treatment of buried remains), enabling the developer to address any scheme amendments or make appropriate provisions for archaeological mitigation that may be required at an early stage in the consenting process.

2.76 Accordingly, it is considered that the re-worded Policy and supporting text together with the provisions set out in Chapter 16 of the NPPF (paragraphs 194 and 195) will ensure that archaeology at this site is conserved appropriately.

South Wonston

1. Would the adjustment to the settlement boundary at South Wonston be justified by the evidence and would it accord a clear and easily understood methodology that has been consistently applied?

WCC response:

2.77 As set out in the response to Matter 2 Q4, the general plan's approach is to adjust settlement boundaries where necessary to accommodate the areas being allocated for additional development; as is the case with the area subject to Policy SW01 at South Wonston.

2.78 Aside from this, it is considered entirely reasonable that the council also considers adjustments to settlement boundaries where particular

circumstances apply that would make this reasonable approach to take and where such an adjustment is justified by the evidence.

- 2.79 In the case of the proposed settlement boundary adjustment at Chaucer Close, South Wonston, the council considers that such circumstances apply, the methodology is clear and understood and the approach taken is justified. Further explanation is set out below.
- 2.80 The western part of the area in question was brought to the council's attention as one of the sites being promoted for development around the village of South Wonston in the SHELAA (2021) (SW03), for 3 dwellings. That part of the area was therefore in the public domain as part of this process and formed part of the discussion on these sites, that took place between WCC officers and the Parish Council on 20.04.22. At that meeting, the council raised the possibility of adjustments to the settlement boundary, both in this area and for the parish to consider generally. The parish were not in favour of reviewing the boundary in any location.
- 2.81 The parish also considered that the land in question would not be able to be developed currently due to access issues, referring to recent planning applications on the site ([20/02245/FUL \[WDN 08.01.21\]](#) and [21/02504/FUL \[REF 10.12.21\]](#) refer).
- 2.82 The application was refused as it was development within the countryside and contrary to MTRA4 of the Local Plan (Part 1) and contrary to DM16 and DM23 of the Local Plan (Part 2) as well, as there were design issues with the proposal.
- 2.83 These applications recognised that access was currently an issue, however, correspondence from the local highways authority (HCC) confirms that they would have no objection for a limited amount of development in that area, provided that suitable access could be achieved. Chaucer Close is an un-adopted road and HCC generally have a limit of 5 properties that can be accessed from such roads. The promoter of the site states that he has access rights over no1 Canterbury Cottages which would enable access to be achieved to that area. There would also be constraints on the in-depth development of the area as currently accessed due to distances from the highway for the purposes of refuse and utilities provision and emergency services access. The planning application was for 3 dwellings, which would be acceptable in principle, subject to the above from a highways point of view.
- 2.84 The planning application confirms that there would be limited impacts on the wider views to the north of South Wonston and there would therefore be no landscape constraints to the proposal, subject to suitable screening.
- 2.85 The council have considered making the SHELAA site area an allocation, but the quantity of development that can currently be accommodated (3 dwellings) is of a scale that would not normally be considered appropriate to specifically allocate.

- 2.86 In analysing the site and the surrounding area, the council came to the view that an adjustment to the settlement boundary could be considered in this area and that this could logically be extended to include the rear gardens of 63-69 Wights Way. In coming to this conclusion, the council considered the character of the area which is considered 'urban' in landscape terms and is also highlighted as such within the South Wonston Village Design Statement (2014) (VDS07). The inclusion of rear gardens within the settlement boundary would be consistent with the approach generally taken across the plan area, where domestic gardens are considered as part of a settlement and not generally viewed as part of the countryside.
- 2.87 The Settlement Boundary Review 2014 document referred to by representations at Reg 19 formed part of the development of the Local Plan Part 2 and is not part of the current Local Plan evidence base.
- 2.88 The area of SW03 SHELAA site and the possibility of settlement boundary adjustments were discussed with the parish and the settlement boundary adjustment formed part of the Reg 18 Local Plan and so has been subject to public consultation as part of the statutory process.
- 2.89 The council considers that due to the particular circumstances of this area the adjustment of the settlement boundary represents a rational approach which is justified by the evidence and based on established methodology, consistent with the approach taken elsewhere.

Policy SW01 Land at the West Hill Road North

1. What is the status of the South Wonston Village Design Statement? Would it be desirable for development of Policy SW01 to accord with that document? And if so, through what mechanism would this be secured?

WCC response:

- 3.1 The South Wonston Village Design Statement is a Supplementary Planning Document adopted by the Council in 2014, as supplementary to the Local Plan (Joint Core Strategy 2013 and the saved policies of the WDLPR 2006). [South Wonston Village Design Statement \(2014\)](#) forms part of the Evidence Base for the plan (VDS07). Policy SW01 will be the local plan policy that development of the site should comply with. The Village Design Statement will therefore be a material consideration for proposals in this area.
- 3.2 A suggested amendment to Policy SW01 (vii) has been proposed at Reg 19 by the Parish Council, which would expand on the views referred to and make specific reference to 'View 2, Looking towards South Wonston Farm' from the Village Design Statement. They also suggested that the text of GD2 of the

South Wonston Village Design Statement 2014 should be included within the text of Policy SW01.

- 3.3 Given the status of the South Wonston Village Design Statement 2014 as set out above, it would not be appropriate to quote the guidance from the SPD within the policy criteria. The plan refers to the VDS in the text at para 2.71.
- 3.4 In recognition of the landscape impacts of development, the plan contains provisions to minimise these. Paragraphs 14.70 and 14.171 describe the surrounding landscape character of SW01, including highlighting the value of the wider views to the north. Paragraph 14.171 emphasises the importance of development minimising visual intrusion into the wider landscape and makes specific reference to the South Wonston VDS as part of this.
- 3.5 Policy SW01 criteria ii) specifically requires that the general siting of development, open space, landscaping and access points minimise wider landscape impacts, amongst other aspects. Criteria vii) explicitly requires landscape buffers to protect the wider views from the village to the north.
- 3.6 In addition to these protections, criteria ii) of Policy D4 (Design Principles for Market Towns and Rural Area) requires proposals to demonstrate how they take account of any relevant aspects, identified characteristics and principles set out in Village Design Statements within the MTRA of the Plan. There are also other general policies in the plan that will be used in consideration of the visual impacts of the proposed development, particularly NE9 (Landscape Character) and NE15 (Rural Character).
- 3.7 Accordingly, the council consider that – given the status of the South Wonston Village Design Statement – Policy SW01 and its supporting text make proper reference to the VDS and contain appropriate criteria that address the issues of visual impact raised by it. The council therefore consider SW01 to be legally compliant, reasonable and sound in this respect.

2. Policy SW0i includes a phasing restriction. Would this be justified by the evidence?

WCC response:

- 3.8 Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations which are not for priority housing from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).
- 3.9 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024 NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the

Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

- 3.10 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).
- 3.11 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

3. Would the policy make appropriate provisions for off site infrastructure needs?

WCC response:

- 3.12 The city council have proactively engaged with a number of infrastructure providers in the process of preparing the plan including the ICB and Southern Water. The Council consider it necessary to address the offsite infrastructure needs proposed by the ICB and Southern Water to reflect the comments made in their Regulation 19 consultation response. PM153 in the Schedule of Proposed Modifications ([SD14a](#)) amends bullet point ii. of the policy to reflect the comments made by the ICB in relation to infrastructure requirements..
- 3.13 The city council consider that the proposed re-wording of the policy and supporting text makes appropriate provisions for offsite infrastructure needs.

Sutton Scotney

Policy SU01 Land at Brightlands

1. Give that this site would be outside the existing settlements boundary and the presence of the A30 road, what is the evidence to justify the location of this site in relation to the settlement of Sutton Scotney to further the aims of Plan policy SP1?

WCC response:

Existing problems

3.14 Officers acknowledge that the situation regarding the capacity of the mains drainage in Sutton Scotney being unable to cope with sewerage has been unacceptable (tankers have been pumping out sewerage out of the settlement on a regular basis as a result of the nearby service station connecting to the mains drainage system which caused the existing system to fail). At the time of preparing the Regulation 18 Local Plan in November 2022 there was not a deliverable solution to address this pressing issue.

3.15 Paragraph 14.133 in the Regulation 18 Local Plan ([CON01](#)) stated:

'Sutton Scotney is within the group of 'intermediate' settlements, where the aim was to identify new sites for 50-60 dwellings. However, investigation of the few potential development sites has revealed substantial foul drainage issues, such that it would not be appropriate to allocate additional land for development in this Local Plan. This could be reviewed in future Plans, should the current issues be resolved. It is expected that there is capacity for the development of about 20 dwellings in Sutton Scotney through windfall development'.

New pipeline

3.16 Since the Regulation 18 Local Plan was consulted on, the city council has been working constructively with Southern Water who have now progressed work on bringing forward a solution in the form of the installation of a new £5.2 million main sewage pipeline that connects Sutton Scotney to mains drainage network in South Wonston along with upgrades to the pumping station at Saddlers Close and rising main at Gratton Close. Appendix 2 in the Southern Water Statement of Common Ground ([SD08K](#)) confirms the delivery timescales for the scheme.

3.17 Based on the fact that there is a fully funded mains drainage solution (the new sewerage pipeline is now in the ground) the selection of the Brightlands site for 50 - 60 dwellings in the Proposed Submission Local Plan (Regulation 19) was informed by the Development Strategy and Site Selection Topic Paper ([S10c](#)) and the Sutton Scotney Site Selection Information document ([DS02](#)).

3.18 As part of this site selection work land south of Wonston Road, Sutton Scotney (which was put forward as a new site in the Regulation 18 public consultation), was also assessed in document [DS02](#). However, there were concerns over flooding of the Wonston Road site (Flood Zone 3 crosses over access to this site) and landscape sensitivity were two key constraints. Having assessed the two alternative sites, the city council believes that the site at Brightlands (Policy SU01) is a more appropriate location to accommodate 50-60 dwellings and

would be a sustainable and deliverable extension to the settlement of Sutton Scotney.

- 3.19 Whilst it is accepted that the Brightlands site is on the opposite site of the A30, the city council believes that this issue can be addressed by the inclusion of criterion vi of Policy SU01 which requires a new crossing linking the site to Sutton Scotney. It is considered that this would also have the added benefit of slowing traffic speeds down. The inclusion of a pedestrian crossing has been confirmed by [Carter Jonas](#) in their representation to the Regulation 19 Local Plan. In view of this, the city council believes that the allocation of the site at Brightlands site does accord with aims of Plan policy SP1 and the site should be allocated for development.

2. A number of site constraints have been identified including flooding and drainage, sewerage capacity, archaeology, access and road safety, biodiversity, use of best and most versatile land, off site infrastructure requirements, and noise. Would any site constraints be a barrier to delivery of this site in the Plan period?

WCC response:

- 3.20 A number of discussions did take place with representatives from Wonston Parish Council prior to the public consultation of the Proposed Submission Local Plan (Regulation 19). As Officers were aware of specific issues in Sutton Scotney prior to allocating a site for development, discussions took place with the Local Lead Flood Authority (LLFA) and Southern Water. The discussions with Southern Water and the LLFA have all directly informed the wording of paragraphs in the supporting text and the criterion in Policy SU01.
- 3.21 Criterion iii of Policy SU01 requires an above-ground SuDS system to mitigate the risk of siltation and control surface water. Criterion xi of Policy SU01 requires a Hydrogeological Risk Assessment to ensure that groundwater conditions are properly managed. Criterion xii in Policy SU01 requires a site-specific Flood Risk Assessment (FRA) and drainage strategy will be required to demonstrate how development will remain safe over its lifetime and will not increase flood risk elsewhere.
- 3.22 The development of this site is phased to align with the new sewerage pipeline between Sutton Scotney and South Wonston, ensuring that there is adequate sewerage capacity (criterion xvii). Policy SU01 also requires the layout of development to allow for future access to existing sewerage infrastructure for maintenance and potential upgrades (criterion xvii). Appendix 1 in the Southern Water Statement of Common Ground ([SD08K](#)) confirms the delivery timescale for the new pipeline that will overcome the problems of sewerage that the settlement has been experiencing over a number of years. Proposed Modification PM154 seeks to update the supporting text and PM157 and PM158 outlines changes to the criteria in the policy to provide further clarity.

- 3.24 The site has known archaeological potential, and the policy requires a geophysical survey and evaluation trenching before the design process begins (criterion ix). This will ensure archaeological significance is understood, and any necessary mitigation strategies are incorporated. PM156 add further clarity to the supporting text.
- 3.25 The policy includes specific access requirements, such as a new pedestrian crossing on the A30, ensuring safe connectivity to Sutton Scotney (criterion vi). Vehicular access will be taken from the existing roundabout to minimise impact, while cycle and pedestrian links will enhance sustainable travel options.
- 3.26 The policy requires landscaping buffers on the east, west, and south boundaries to be retained and reinforced, except where removal is necessary for access (criterion xv).
- 3.27 The site is not classified as best and most versatile agricultural land, and its allocation has been carefully considered in the context of wider site selection process for suitable sites in Sutton Scotney.
- 3.28 The policy requires the development to identify and contribute to necessary infrastructure improvements, ensuring its successful integration with the wider settlement. The policy includes a requirement for a Noise Assessment to assess and mitigate potential impacts from the nearby service station and A34 to ensure acceptable living conditions for future residents (criterion xvi).
- 3.29 Overall, while the city council accepts that like many sites there are constraints, the wording of the policy will ensure these issues will be properly assessed and mitigated, allowing for the sustainable extension to the settlement within the Plan period. For the reasons that have been outlined above, the city council believes that the identified site constraints would not be a barrier to the delivery of the site as appropriate mitigation measures have been identified to ensure the site is both deliverable and sustainable.

3. As this is a greenfield site a phasing restriction is included in Plan policy SU01ii. What is the evidence to justify this approach in relation to this site?

WCC response:

- 3.30 As this is a greenfield site a phasing restriction has been put in place for this site to come forward post 2030. Paragraph 6.8 of the Housing Topic Paper ([SD10g](#)) identifies the effects of the phasing policy which would prevent the new greenfield site allocations, which are not for priority housing, from coming forward until 2030. This shows that, without the phasing policy, completions would peak in 2028/29 and would start to fall thereafter. This is shown in the graph in Appendix C: Effect of Phasing on Housing Trajectory on page 42 of the Housing Topic Paper update ([EDO2](#)).
- 3.31 The 2030 greenfield phasing policy will give time for the Local Plan to be reviewed so as to provide the higher housing numbers required by the 2024

NPPF/Standard Method. Without phasing it may be possible to maintain an adequate 5-year + 20% land supply for only a short period after adoption of the Local Plan, creating a situation where there could be a presumption in favour of permission (NPPF paragraph 11d) due to inadequate land supply, but no adopted replacement Plan. The result would be a risk of planning by appeal and development that is not properly planned or plan-led. It also helps to deliver the City Council's prioritisation of brownfield sites, consistent with NPPF paragraph 123, whilst recognising that there are a number of site allocations, particularly Major Development Areas that have been rolled forward to the Proposed Submission Local Plan (Regulation 19) such as Kings Barton, West of Waterlooville and North Whiteley that are all located on greenfield sites.

3.32 As indicated in paragraph 6.14 of the Housing Topic Update ([EDO2](#)), as well as making a more even housing delivery over most of the Plan period, policy H2 also helps to address the delivery of infrastructure (e.g. electricity and water supply). All of the phasing assumptions in the Local Plan have been used to inform the collaborative discussions that have taken place between the city council and various infrastructure providers and the information that has been included in the Infrastructure Delivery Plan ([IN01](#)).

3.33 The phasing assumptions that have been included in the Local Plan have also directly informed the analysis of the demand and supply of nutrient mitigation which has been included in the Nutrient Neutrality Topic Paper ([SD10h](#)). Without the phasing policy for greenfield sites, there would be an immediate impact on the short-term supply of nutrient mitigation, potentially having a significant impact on the five-year housing land supply – please see table in response to Matter 4 in relation to Policy H2. In view of the above, the city council believes that the phasing policy has been justified by evidence.

4. Given identified site constraints, what is the evidence that the site allocation would be viable based on the indicative capacity?

WCC response:

3.34 In accordance with Strategic Policy D1 (High Quality, Well Designed Places and Inclusive Places) it is important that any development considers and responds to its local context. The city council believes that the development (50-60 dwellings) would be of an appropriate scale for the settlement and it would meet the aims of Policy D1. There is no evidence before the city council that indicates that there are any particular abnormal costs that are associated with delivering this particular site at this scale of development. In view of this the city council considers that the scale of the development is appropriate and deliverable for this settlement taking into consideration the local context.

5. Would Plan policy SU01 be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, particularly in relation to SU01ix ('design process')?

WCC response:

3.35 Criterion ix refers to the 'design process' which is an integral part of the development of this Local Plan. The design process is reflected in the diagram on page 59, page 60, page 62, page 76, paragraph 5.41 and Strategic Policy D1 (High Quality, Well Designed and Inclusive Places). In view of this, the city believes that the policy has been clearly written and unambiguous as it is important that the Local Plan is read as whole.

6. Plan policy SU01 xi in relation to hydrogeological risks requires a risk assessment. How would it control any impacts on groundwater conditions and levels? In this respect would the policy be effective?

WCC response:

3.36 As mentioned in response to question 2, discussions have taken place with the Local Lead Flood Authority (LLFA) and the wording of paragraph 14.184 and criterion xi in Policy SU01 were drafted in accordance with their advice. In view of this and combined with the fact that a site-specific Flood Risk Assessment and drainage strategy would need to be submitted and agreed, the city council believes that this will ensure development is safe from flooding and does not increase flood risk elsewhere. Criterion iii of Policy SU01 also requires SuDS to manage surface water runoff and mitigate siltation risks. These measures would align with national policy and best practice in terms of sustainable urban drainage and environmental protection. The wording of the SuDS policy has also been agreed with the LLFA and there is no evidence before the city council to indicate that the wording of the policy would not be effective.

7. Would requirements in relation to health care be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

3.37 PM171 in the Schedule of Proposed Modifications ([SD14a](#)) has put forward an amendment to criterion xviii to ensure that necessary infrastructure is taken into account. In addition, PM155 deletes paragraph 14.186 of the supporting text, which largely duplicates paragraph 14.187 and was included in error. The city council believes that this proposed modifications would increase the clarity and the interpretation of policy in relation to health.

8. Would the supporting text and policy SU01, in phasing development to align with and drain to the new sewerage infrastructure, be effective in ensuring adequate waste water and drainage?

WCC response:

- 3.38 Policy SU01 is effective in ensuring adequate wastewater and drainage provision by explicitly phasing development to align with the delivery of new sewerage infrastructure. Policy SU01 requires that occupation of the development is phased to ensure it can connect to the new sewerage pipeline.
- 3.39 The policy explicitly requires consultation with the sewerage service provider to ensure that wastewater infrastructure is delivered in a way that can accommodate the development. This approach ensures that Southern Water or another relevant provider has time to make any necessary upgrades. In ongoing engagement with Southern Water further clarification was provided in the updated Statement of Common Ground ([SD08k](#)) in relation to the works, phasing and plans for the pipeline between Sutton Scotney, South Wonston and Harestock Wastewater Treatment Works and therefore the Council propose a modification to criterion xvii (PM158) to ensure the policy will be effective in ensuring adequate waste water and drainage.