

## Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

### Stage 2 Hearings Matters, Issues and Questions

#### Policy H4 and Matter 10

**Matter 10 Homes for all (policies H4-H11) Issue: Would the housing policies H4-H11 be clear, justified and consistent with national policy and would they be effective?**

The Housing Policies are unduly restrictive especially Policy H4. Please see previous submissions. This is the Response to Inspector's Questions:-

#### Policy H4 Development within settlements

**1. Given government policy to significantly boost the supply of housing, what is the robust evidence for the appropriateness of this policy which may work to restrict housing development in some types of settlements?**

Response:- There is no attempt to comply with Paragraph 70 of the NPPF (Dec 2023) that requires at least 10% of the housing requirement to be accommodated on sites no larger than one hectare. The paragraph makes clear that the provision of small sites has many benefits. It assists smaller companies who cannot compete with the volume builders. The developments can be completed and delivered more quickly. It provided economic benefits because it enables small building contractors to obtain work and these builders usually employ local people.

Paragraph 9.23 of the Local Plan claims that the NPPF requirement is resolved but it refers to historic completions.

**2. Would policy H4 be clearly written, and unambiguous, so it is evident how a decision maker should react to development proposals?**

Response: Policy H4 is poorly written. It is not made clear that there are other hurdles with regard to interrelated policies such as MTRA4 and CP18 Gaps (now NE.7). Infilling should simply be judged on the merits case by case such as character and appearance and not rejected in principle because of conflict with other policies.

There are several cases that demonstrate the problem.

At School Lane, Kingsworthy, the Inspector confirmed that the Gap Policy was not relevant. The appeal site in School Lane, Kings Worthy was dismissed on the basis of conflict with infilling policy even though the Inspector confirmed that the site was *not* in conflict with the Kingsworthy- Abbots Worthy Gap" (APP/L1765/W/22/3310078).

The site had housing development on three sides, but the fourth side backed on to countryside. The site was in a sustainable location. Reference was made to other similar cases in Swanmore and Whiteley in other submitted documents (ie letter to the Council dated 13 September 2024).

**3. Would policy H4 provide appropriate flexibility to support sustainable development in settlements with defined settlement boundaries? Would it enhance or maintain the vitality of rural communities and promote small sites to meet identified need? Should the policy provide clear criteria for development that directly adjoins settlement boundaries?**

Response: Some settlements with boundaries are only marginally more sustainable than the ones listed without boundaries. The policy excludes all settlements affected by the Gap Policies. These locations are more sustainable.

**4. Would policy H4 provide clear and appropriate criteria to support sustainable development within settlements with no defined settlement boundary? Would it be likely to enhance or maintain the vitality of rural communities and promote small sites to meet identified need?**

This Policy is perverse. Development close to existing settlements has been rejected and yet these are areas that are the most sustainable. The principal objection is the gap policies.

A settlement without a boundary indicates that the settlement is small and that there are few services and facilities. These are the least sustainable villages.

The policy gives priority to the least sustainable settlements. Infilling of a few sites is not going to make these settlements more sustainable.

The Local Plan has not provided any guidance as to how community supported development can be progressed. At Whiteley Lane, ten of the eleven households specifically supported the development of two detached dwellings. The Council claimed that it wasn't a proper consultation but the only party that didn't participate was the Council. The Plan should provide full guidance on what community support means so that it can be addressed satisfactorily.

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