

Planning Policy
Winchester City Council
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Our ref: 620/0939/0413/00062911.00046

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By Email Only: planningpolicy@winchester.gov.uk

Dear Sirs

Winchester Local Plan Regulation 18 Consultation Representations Regarding Hursley

These representations are made on behalf of our client, [REDACTED], a resident of Hursley.

1 Summary

The draft plan currently fails the tests of soundness for the following reasons:

- 1 Not Justified** – the evidence base for the Plan is fundamentally flawed and needs to be corrected in order for the Plan to be found sound.
- 2 Not Justified, Positively Prepared nor Consistent with National Policy** – The flaws in the evidence base underpin a flawed approach to the settlement of Hursley. Each iteration of the Local Plan evidence has underplayed the sustainability of the settlement and its suitability to contribute towards meeting the housing needs of the District. This, in turn, has underpinned the formulation of a policy approach whereby Hursley has, in effect, been given a housing target of zero whilst other settlements of the same category (even those which score lower than Hursley) have been given housing targets of between 40 and 60 dwellings.

As a result, the Plan does not provide an appropriate strategy for Intermediate Level Settlements taking into account the reasonable alternatives. Nor is the policy approach based on proportionate evidence.

Hursley is a well located and very sustainable settlement. Hursley has a surprising range of local facilities and employment opportunities which would significantly reduce the need for new residents to rely on travel by private motor car. The draft plan fails to take the opportunity to allocate housing to this very sustainable settlement. This approach runs contrary to all available evidence.

As a result, the draft Plan fails to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

3 **Not Effective** – The above failings seriously undermine the effectiveness of the plan.

4 **Anomalies with Hursley Settlement Boundary**

The drawing of the settlement boundary from Hursley is inconsistent. In some cases, the settlement boundary is drawn so close to the built area that it cuts through gardens or excludes existing dwellings. To the south of the settlement, the boundary is so generously drawn that it includes land which is outside of any residential curtilage which currently has agricultural use together with undeveloped areas of green land, some of which is currently woodland. The development of these green areas has not been considered at any point the local plan process and has not been subjected to the Council's Integrated Impact Assessment process. Failure to assess these areas against reasonable alternatives fails to meet the statutory requirements.

5 We have repeatedly drawn the Council's attention to the anomalies regarding the treatment of Hursley in each iteration of the draft Local Plan. Despite "tweaks" being made to the policy and underpinning evidence base, these changes appear to have been the minimum considered necessary to reduce the risk of challenge.

6 No positive steps have been made to remedy the clear inconsistencies in the policy approach to Hursley when compared to other settlements of a similar or lower classification. This should be seen as a "red flag". It appears that the policies of the plan in this respect have been prepared in order to achieve a politically driven motive rather than being justified, evidence-based and positively prepared.

Our concerns are elaborated upon below.

7 **Tests of Soundness**

7.1 In order to be found sound at examination, the Plan must pass the tests of soundness. The Plan must be:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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

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

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.¹

7.2 We have summarised above examples of the ways in which the Plan currently fails to meet these tests. We have elaborated on each point below. However, before embarking on this analysis, we have set out a short summary regarding the settlement of Hursley and its sustainability credentials which make the settlement particularly suitable to make a meaningful contribution towards meeting the unmet housing needs of the District.

8 Hursley

- 8.1 Hursley is one of the most sustainable villages in the plan area. It has a surprisingly comprehensive range of employment opportunities.
- 8.2 The settlement has well over 2,000 jobs with a wide range of skill levels. Hursley contains the IBM campus which also includes Incuive (a co-working and business incubation space) and a number of other facilities. The number and range of jobs which are accessible within walking and cycling distance from the centre of Hursley puts it in a uniquely sustainable position to accommodate new housing.
- 8.3 The settlement also has an extensive range of services including a primary school, nurse, convenience store, butchers shop, play areas, Sports and Social Club, 2 pubs and a café.
- 8.4 The settlement is well connected to the surrounding area by public transport. Hursley is around 3 miles to the south Winchester, around 5 miles to the north east of Romsey and around 4 miles to the north of Eastleigh. The settlement is served by regular bus services to Winchester and the other settlements.
- 8.5 Nonetheless, in each iteration of the Local Plan, Hursley has been singled out for different treatment to the other settlements of the same classification (“Intermediate Rural Settlements”).
- 8.6 The draft Local Plan requires each of the Intermediate Rural Settlements “to identify new sites for 50 to 60 dwellings each”. This planned growth of 50-60 dwellings is in addition to the 20 Windfall Dwellings expected to be delivered in each settlement.
- 8.7 Hursley falls within this group of settlements and yet the proposed amendments to the local plan now only provide for a combined total of 20 Dwellings – including both allocations (to be made through the Neighbourhood Plan) and windfalls. In effect, Hursley is being given a housing target of zero.
- 8.8 This is particularly surprising given that, as demonstrated by this representation, had Hursley been correctly scored in the settlement assessment, the settlement should have been included in the “Larger Rural Settlement” category. Even using the Council’s own scoring (which underplays the sustainability of the settlement), Hursley scores joint top in its category with South Wonston and Otterbourne scoring lower. Nonetheless, Otterbourne is given an

¹ Para 35 NPPF

allocation of 55 dwellings (plus a 20 dwelling windfall) and South Wonston is given an allocation of 40 dwellings (plus a 20 dwelling windfall).

8.9 At no point has a credible explanation been given for this difference in treatment.

9 Progress Towards a Neighbourhood Plan for Hursley

9.1 Throughout the Local Plan process, the Council has sought to delegate its responsibilities to provide a housing target for Hursley to the emerging Neighbourhood Plan. Setting aside the fact that the unwillingness to set a realistic and positively planned housing target for Hursley is contrary to both the spirit and the letter of the NPPF, in practical terms, this strategy is unlikely to be effective or result in the delivery of any development or other housing.

9.2 The Neighbourhood Plan Area was designated in January 2021. Since that date, no progress appears to have been made in the Neighbourhood Plan process. No draft plans or discussion documents have been produced or consulted upon. There is one undated document on the Parish Council's website stating that "the Parish Plan team is now keen to develop a neighbourhood plan". However, this document has been on the Parish Council's website since at least 2022. No progress has been made since that date.

9.3 The failure to meet the development needs of Hursley (and the District more widely) will make the Council vulnerable to speculative planning applications and appeals. This is precisely what the plan-led system is intended to avoid.

9.4 By failing to grapple adequately with what appears to be a thorny political issue (i.e. housing delivery within Hursley), the Council is failing to perform its role as Local Planning Authority in a manner that undermines the plan led system more widely. There is nothing to be gained from this approach.

10 Not Justified, Positively Prepared nor Consistent with National Policy

10.1 In order to be "positively prepared", the Plan must provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

10.2 Pursuant to the NPPF, "*the development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area*"². "*Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.*"³

10.3 Pursuant to paragraph 66 of the NPPF "*Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out*

² Para 17 NPPG and Section 19(1B-1E) of the Planning and Compulsory Purchase Act 2004.

³ Para 23 NPPF

*a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations*⁴

- 10.4 Local Plans contain both strategic and non-strategic policies whereas neighbourhood plans can only contain non-strategic policies. Therefore, it important that the housing requirement for each designated neighbourhood area is set out in the strategic local plan policies and, importantly, that the “housing requirement for designated neighbourhood areas .. reflects the overall strategy for the pattern and scale of development”.
- 10.5 Whilst the plan will be examined having regard to the policies as currently proposed, the development of the policy approach to Hursley is relevant and enlightening. Prior to the Reg 18 Plan, the draft plan factored in an anticipated 20 windfall dwellings for Hursley together with an additional housing target to be formulated as part of the Neighbourhood Plan process. At that stage, the Local Plan stated:
- “Following the reassessment and updating of the settlement hierarchy, Hursley is now within the group of ‘intermediate’ settlements, where the aim was to identify new sites for 50-60 dwellings. However, the parish council has commenced production of a Neighbourhood Plan and it would not be appropriate to identify a new housing target at this stage.”* (para 14.107)
- 10.6 Para 14.108 of the Local Plan at that stage gave a target for New Sites to be allocated in Hursley Neighbourhood Plan (Policy HU1) as “?”.
- 10.7 The Council has since moved away from this approach but not in a manner that will result in the allocation of any sites within the emerging Neighbourhood Plan.
- 10.8 The Local Plan now states:

INTERMEDIATE RURAL SETTLEMENTS

HURSLEY

14.147

Following the reassessment and updating of the settlement hierarchy, Hursley is now within the group of ‘intermediate’ settlements, where the aim was to identify new sites for 50-60 dwellings. However, the parish council has commenced production of a Neighbourhood Plan and it would not be appropriate to identify a new housing target at this stage. Even so, the Neighbourhood Plan is able to identify local housing needs and allocate any sites that may be appropriate as it is developed.

14.148

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, which can be achieved as follows

⁴ See also Paragraph: 009 of the NPPG Reference ID: 41-009-20190509 which restates the requirement for strategic policies to set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement.

Hursley Housing Sources	No. of dwellings
Net Completions in or adjoining settlement (2020 - 2023)	0
Outstanding permissions (at 2023)	0
New Sites to be provided by allocations in Hursley Neighbourhood Plan or windfall (Policy HU1)	20
Total Provision 2020 - 2040	20

10.9 Policy HU1 goes on to state:

“Additional land will be allocated as necessary to meet local housing and other needs in the Hursley Neighbourhood Plan, including provision through site allocations or windfall for about 20 dwellings and any amendments to the settlement boundary. Development will be expected to:

i. Show how it contributes towards the Vision and Objectives of the Plan in Policy SP1 and is in general conformity with its strategic approach;

ii. Have regard to information on local needs for new homes, jobs and facilities, for the Neighbourhood Plan area.”

- 10.10 As explained above, this is wholly at odds with the approach taken to settlements within the same category as Hursley. Even settlements which score lower in the Settlement Hierarchy Assessments are given an allocation or housing target in addition to the predicted windfall allowance of 20 dwellings. Hursley is the only Intermediate Rural Settlement to be given a housing target of zero. No explanation is given for this difference in approach.
- 10.11 The difference in approach is particularly difficult to understand given that, if scored correctly, Hursley would have fallen into the higher category of settlement (Large Rural Settlement).
- 10.12 It is wholly insufficient to set the housing requirement for the designated neighbourhood area of Hursley as zero. In so doing, the Council is failing in its role as a local planning authority by seeking to dodge making an unpopular political decision. In short, the Council is not pursuing an evidence-based nor positively prepared strategy which, as a minimum, seeks to meet the area’s housing needs.
- 10.13 To date, the Council has identified the emerging Neighbourhood Plan as the reason why the Council first refused to set a housing target for Hursley and then set a housing target of zero. However, this is at odds with the other settlements identified in the Local Plan as having emerging Neighbourhood Plans.
- 10.14 The Local Plan 14.7 states *“New Alresford, Denmead and Hursley have existing or emerging Neighbourhood Plans which will need to provide for the housing targets identified in Policies NA3, D1 and HU1”*. Both Denmead and New Alresford are each set housing targets for their Neighbourhood Plans to allocate land for 100 Dwellings⁵ in addition to other planned development and windfall allowances.
- 10.15 Therefore, the Council appears to be aware of the need to comply with the clear advice of the NPPF to set housing targets for neighbourhood plan areas, but refuses to do so for Hursley.

⁵ See policy H2 and pages 435 and 405 of the Reg 19 Local Plan.

Again, Hursley has been singled out for different treatment with no credible explanation or objective, evidence-based reason.

- 10.16 The Supporting Text to policy HU1 states *“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...”*. No evidence is given to explain how the Council has reached the view that there would be “capacity for the development of about 20 dwellings in Hursley”.
- 10.17 Paragraph 1.3 of the Strategic Housing and Employment Availability Assessment (SHELAA) published in December 2021 states that the document *“forms an important part of the evidence base that will help to inform the preparation of the new Local Plan. Its purpose is to enable realistic assumptions to be made about how much housing and employment space could potentially come forward on sites that are suitable, available and achievable to meet the council’s housing and employment needs.”* And yet, the SHELAA appears to have been ignored when preparing the policies for Hursley.
- 10.18 The 2021 SHELAA identifies 5 potential sites around the village of Hursley. Each site scores highly against the SHELAA criteria. None of the sites has a constraint that would result in the site being undeliverable or unsuitable for housing. Together, these sites have capacity to accommodate 117 dwellings. Each site is identified as being available and deliverable within the first 5 years.
- 10.19 The statements made in the Local Plan run entirely contrary to the evidence base which has been prepared. No explanation is given or evidence produced to explain the approach taken by the Local Plan.
- 10.20 Setting an artificially low development capacity for Hursley will curtail and effectively predetermine the outcome of the Neighbourhood Planning process. No statement should be made which would limit capacity unless there is compelling evidence which justifies such a setting a limit.

11 Errors in the Evidence Base

- 11.1 The NPPF makes it clear that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence”⁶.
- 11.2 Paragraph 9 of the NPPF notes that planning policies and decisions should play an active role in guiding development towards sustainable solutions, taking local circumstances into account, to reflect the character, needs and opportunities of each area.
- 11.3 Therefore, the assessment of the sustainability credentials of settlements in order to generate a settlement hierarchy is of considerable importance.
- 11.4 Since December 2022, we have written a number of letters to the Council pointing out that the assessment of Hursley that informs the Local Plan fails to take account of a number of facilities.

⁶ Para 31

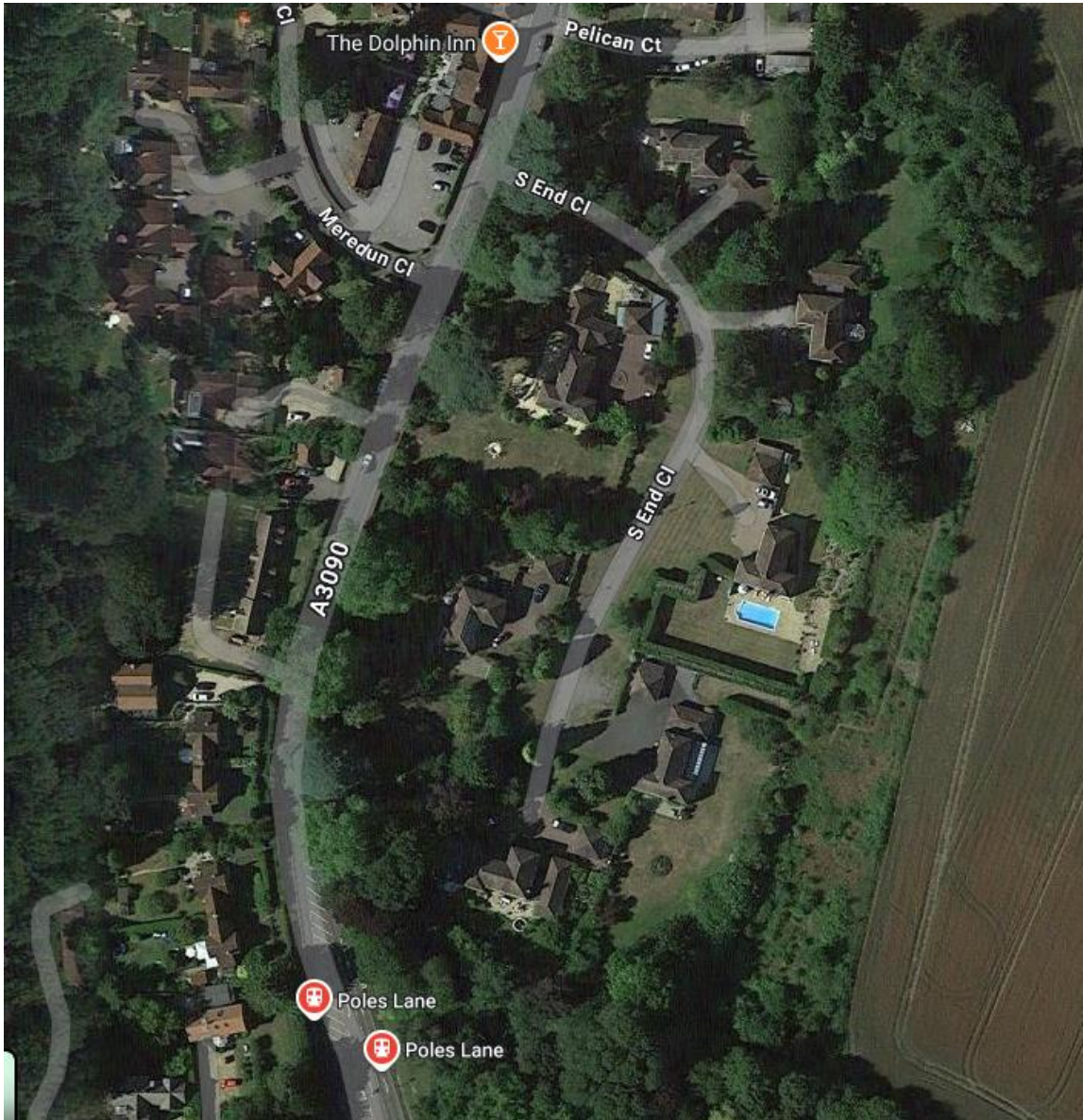
- 11.5 Whilst the Settlement Hierarchy Assessment has been updated, the assessment of Hursley still contains fundamental errors which underplay the status and sustainability of the settlement.
- 11.6 Hursley's sustainability credentials are a matter of fact. The information is objective, openly discoverable and easily proven. We have tried to point out to the Council that there is nothing to be gained by the Council in relying on a flawed evidence base. Nonetheless, the Council continues to omit reference to facilities when assessing Hursley.
- 11.7 Originally, despite the facilities available in Hursley, it was assessed as being smaller rural settlement. Following reassessment in the Review of Settlement Hierarchy 2022, Hursley was included within the group of 'intermediate' rural settlements. The Council updated the Settlement Hierarchy Assessment in August 2024. However, the Assessment remains incorrect.
- 11.8 In our 2022 letter, we drew attention to the fact that the assessment failed to take account of a number of facilities. We explained that the score took account of the Post Office but not the shop. We also noted that the Hursley has a butchers shop, which is another convenience retail opportunity.
- 11.9 The Council responded to our comments stating "The 2022 Settlement hierarchy document already recognised the Post Office services". This misunderstands the point being made.
- 11.10 The 2024 Updated Settlement Hierarchy Assessment now acknowledges the Convenience Retail (Daily Needs)". However, it rates Hursley as "0" for "Other convenience store (daily needs)". An additional point should have been included.
- 11.11 Hursley is very well served by buses and this is recognised in the score for hourly bus services. However, some settlements which have been scored for "hourly bus services" have received additional scores for infrequent and/or weekly bus services in the "Other Services" element of the assessment (see, for example, the scoring of Winchester, Bishop's Waltham, New Alresford, Kings Worthy, South Wonston). As well as having frequent bus services, Hursley also has infrequent bus services to other locations. Therefore, if the Council is taking this approach when scoring other settlements another point should have been included.
- 11.12 An additional point has been awarded to some settlements with "Access to 2 out of 3 employment types". Whilst it is not clear, we presume that the "3 employment types" is a reference to "warehouse, workshop and/or office" which is given as an example of employment opportunities in the document. Despite the presence of more than 2,000 jobs in the settlement including the IBM campus (which provides a wide range of job opportunities of different types), Hursley scores zero in this respect. This is clearly wrong. An additional point should have been included.
- 11.13 The Council's Local Plan Regulation 18 responses regarding the Settlement Hierarchy (ref BHLF-KSAR-N8ZS-4) states:
- "... The Incuhive falls outside of the settlement boundary but in any event the education provision is not considered sufficient to warrant inclusion, The Hursley Sports and Social Club is outside the settlement boundary. ..."*

- 11.14 The Council's decision to exclude any facilities which fall outside of the tightly drawn settlement limit of Hursley does not follow the methodology which the Council claims to have followed when preparing the Settlement Hierarchy. The August 2024 Update states that the assessment takes account of:
- "Presence of various services and facilities – based upon a survey of all roads extending 1.6km from the edge of each settlement ..."*
- 11.15 Hursley Sports and Social Club is just over 500m outside the settlement boundary. Therefore, this should have been factored into the assessment, resulting in a further point.
- 11.16 Incuhive is also around 500m from the settlement boundary and presents an innovative and unusual "other education opportunity" which is particularly important for start-up businesses. The Local Plan expressly refers to the IBM campus (which includes Incuhive) as being an education/training establishment.
- 11.17 At paragraph 7.24, the Local Plan states *"Across the district there are a number of large commercial and educational/training establishments set in the wider countryside"* and then goes on to list *"IBM (Hursley)"* first in that list. Paragraph 7.24 goes on state *"These establishments are primarily involved in business and training activities which support the district's economy and it is important that they can continue to thrive. They also employ large numbers of people with a range of skills that the council wishes to retain locally."*
- 11.18 The Council's conclusion in its Consultation Response that the "education provision" at Incuhive and the IMB Campus "is not considered sufficient to warrant inclusion" is at odds with paragraph 7.24 of the Local Plan. No explanation is given as to why a different conclusion was reached when assessing the settlement of Hursley. However, we would note that this inconsistency is a hall-mark of the Council's policy approach to Hursley and is indicative of a pattern of behaviour which demonstrates that the plan is not objective nor evidence-based in this respect.
- 11.19 Taking account of the Built Leisure Facilities, additional shop, bus services, other education facilities and the wide range of employment opportunities, Hursley would have scored an additional 5 points thus putting it firmly within the "Larger Rural Settlements" classification with a total score of 25 points (a score of between 22 and 26 would put a settlement in the Larger Rural Settlement classification).
- 11.20 Even if the Inspector does not agree that all of these facilities should have been scored as part of the assessment, there is no getting away from the fact that the sustainability of Hursley has been underplayed by the assessment and has been repeatedly underscored throughout the Local Plan process. Even if 2 of the 5 points find favour with the Inspector, it would put Hursley into the "Larger Rural Settlements" classification.
- 11.21 These sorts of errors have occurred repeatedly throughout the production of the Local Plan. The errors in the assessment underplay Hursley's suitability to accommodate additional development in a sustainable location. This, in turn, feeds through to the strategic approach adopted by the plan and the failure to allocate any housing for the settlement. This is unsound.

12 Anomalies with Hursley's Settlement Boundary

- 12.1 Policy H4 states that Development that accords with the Development Plan will be permitted in Hursley within the defined boundary of the settlements. In effect, the development of land included in the settlement boundary is acceptable in principle. Therefore, the way in which the settlement boundary is drawn is of considerable importance.
- 12.2 The settlement boundary for Hursley is shown on page 474. To the north of the settlement, the boundary is very tightly drawn to the settlement and even cuts through a number of gardens of residential properties. A number of existing dwellings are excluded all together. The boundary excludes a significant part of the existing built-up area of the settlement. No explanation is given for the decisions that have been made in this respect.
- 12.3 Meanwhile, to the south of the settlement, the opposite approach has been taken. For example, land has been included to the rear of properties on South End Close which currently falls outside the curtilages of those dwellings and is currently scrub land. The status of the land is evident when the settlement boundary plan is compared with the below aerial photo taken from Google Earth:





- 12.4 The base plan used for the settlement boundary plan appears to have wrongly included the strip of agricultural land to the rear of the properties at South End Close within the yellow colouring. As shown on the above screen shot, this land falls outside the residential curtilages of the properties. If a consistent approach is to be taken, this land must be excluded from the settlement boundary.
- 12.5 The area of land shown coloured green at the south-eastern edge of the properties at South End Close is clearly outside the residential curtilage of any dwelling and is an area of unkempt land on the edge of an agricultural field. The green land that has been included at South End Close is owned by Mr and Mrs Beddoes. Mr Beddoes is a member of the Neighbourhood Plan Start Up Group.
- 12.6 We cannot find any evidence that this land was assessed as part of the SHEELA or any other part of the Local Plan process (including the Integrated Impact Assessment). Nor can we find

any explanation as to why this land has been included in the settlement boundary whilst other land which is developed or within the residential curtilage of existing dwellings has been excluded. It appears that an inconsistent approach has been adopted to the drawing of the settlement boundary at Hursley.

- 12.7 Similarly, an area of “green land” has been included next to the property known as the Cedars (owned by Mr and Mrs Chapman). This is an area of woodland. Again, we cannot find any evidence that the inclusion of this undeveloped woodland within the settlement boundary has been assessed or considered during any stage of the Local Plan process.
- 12.8 The inclusion of these areas of land is tantamount to their allocation as land which is acceptable in principle for development. As these areas of land do not appear to have been assessed against reasonable alternatives, the Council is in breach its legal duties regarding strategic environmental assessment.
- 12.9 In the interests of fairness, consistency and transparency, if the settlement boundary is to be tightly drawn to exclude all but the built areas, at the very least, all “green” land together with any land which falls outside the residential curtilages of the gardens at South End Close must be excluded. If the gardens at South End Close were to be treated in the same way as those belonging to the properties to the north of the settlement, the extensive areas of land which comprise the gardens to those properties should also be excluded. The Local Plan should treat all landowners equally in this respect.

13 Conclusions

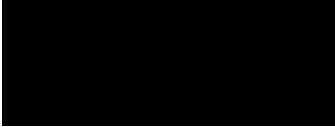
- 13.1 In order to be found sound, the Local Plan must provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs. The strategy must be based on proportionate evidence and must be deliverable over the plan period so that it enables the delivery of sustainable development. Finally, the plan must be consistent with national policy.
- 13.2 In so far as the draft Plan relates to Hursley and the strategy for the Intermediate Rural Settlements, it fails in respect of all of the tests of soundness. For example:
- 13.2.1 The Plan should set a housing requirement for the Hursley Designated Neighbourhood Area but fails to do so.
- 13.2.2 The evidence demonstrates that Hursley is capable of accommodating the 50-60 dwellings suggested by the Local Plan. However, the Plan contains a baseless assertion that the settlement only has capacity for 20 dwellings.
- 13.2.3 The evidence should be up to date and proportionate and, yet, in respect of Hursley, the assessment of the settlement ignores a number of local facilities with the result that the sustainability of the settlement and its ability to accommodate development is significantly underplayed.
- 13.2.4 The settlement boundary for Hursley has been inconsistently drawn with the result that considerable areas of green land are being allocated for development without an assessment being undertaken of any reasonable alternatives. This approach is legally flawed and procedurally unfair.

13.3 In the circumstances, there can be no reasonable explanation why the plan does not set a housing requirement for Hursley in excess of the estimated windfalls.

13.4 There is no objective or evidence-based reason why Hursley should not be asked (through the Neighbourhood Plan process) to identify new sites for 50 to 60 dwellings as expected by the Local Plan. The failure to take this step is particularly conspicuous in the circumstances.

13.5 As a result, the plan is unsound.

Yours faithfully



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