

Winchester District Local Plan (2020-2040)

Regulation 19 Representations On Behalf of Bellway Strategic Land

October 2024

Bellway


**STRATEGIC
LAND**

Gillings
Planning

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1. Botley Road, Bishop's Waltham Vision Document
2. Historic England, Pre-application Feedback

Author

██████████ BSc (Hons) DipTP MRTPI MIoL
Senior Director

Gillings Planning Ltd
2 Wessex Business Park
Colden Common
Winchester
Hampshire
SO21 1WP

██████████@gillingsplanning.co.uk
02382 358855

Client

Bellway Strategic Land

Date of Issue

11th October 2024

1.0 Introduction and Background to these Representations

1.1 Gillings Planning have been instructed by our client Bellway Strategic Land (our 'client') and the landowner's agent Ian Judd and Partners Limited to provide a formal consultation response and make these representations on the Regulation 19 version of the emerging Winchester District Local Plan 2020- 2040 (the 'Local Plan').

1.2 Our client, and the landowners' agent's details are provided below:

<p>██████████ Bellway Homes Limited (Wessex) Embankment Way Castleman Business Centre Ringwood Hampshire BH24 1EU</p>	<p>██████████ Ian Judd and Partners LLP 4 High Street Bishops Waltham Southampton Hampshire SO32 1AB</p>
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1.3 Bellway Homes are supportive of the Government's desire to see a step change and a significant boost in the delivery of much needed new homes, and we support the Government's aims to build at least 300,000 per year, every year across the UK.

1.4 We are pleased to have an opportunity to make representations on the Local Plan and our client is pleased to promote land for development adjoining the settlement of Bishop's Waltham.

1.5 Accordingly, Gillings Planning have been appointed to review the emerging Local Plan in order to ensure that the proposed approach is being prepared positively and accords with the National Planning Policy Framework (NPPF) so that the plan can be found sound, as this is in everyone's interests.

1.6 We can confirm that we have read and understood the Council's disclaimer, and we understand that this response will be published with my name, our client's name, the landowners' agent's name and the associated representation.

Bellway Homes

1.7 Bellway began as a small family business in 1946 - with a passion for building exceptional quality homes in carefully selected locations, inspired by the needs of real families.



1.8 To this day, Bellway maintain these same core values, combining decades of expertise with the level of personalised care that Bellway is known for.

1.9 Bellway Homes' mission is to build first-class family homes that their customers are proud to live in. Bellway Homes were delighted to have been awarded 5-star builder status by the Home Builders Federation for the eighth year running in 2024.



1.10 This prestigious award is not only a reflection of their exceptional quality housing, but of their ongoing commitment customer care, with 9 out of 10 customers saying they would recommend Bellway Homes to a friend.

Bellway Homes' Interest

1.11 Bellway Homes have a specific interest in land adjacent to Crown Hill House, to the east of Botley Road, Bishop's Waltham, Winchester, SO32 1DQ. Botley Road, the B3035, is a main road into Bishop's Waltham from Botley to the south. The site comprises a single field paddock that is framed by a mature hedgerow interspersed with trees on its northern, eastern and southern boundaries and a modest hedgerow on its western boundary.

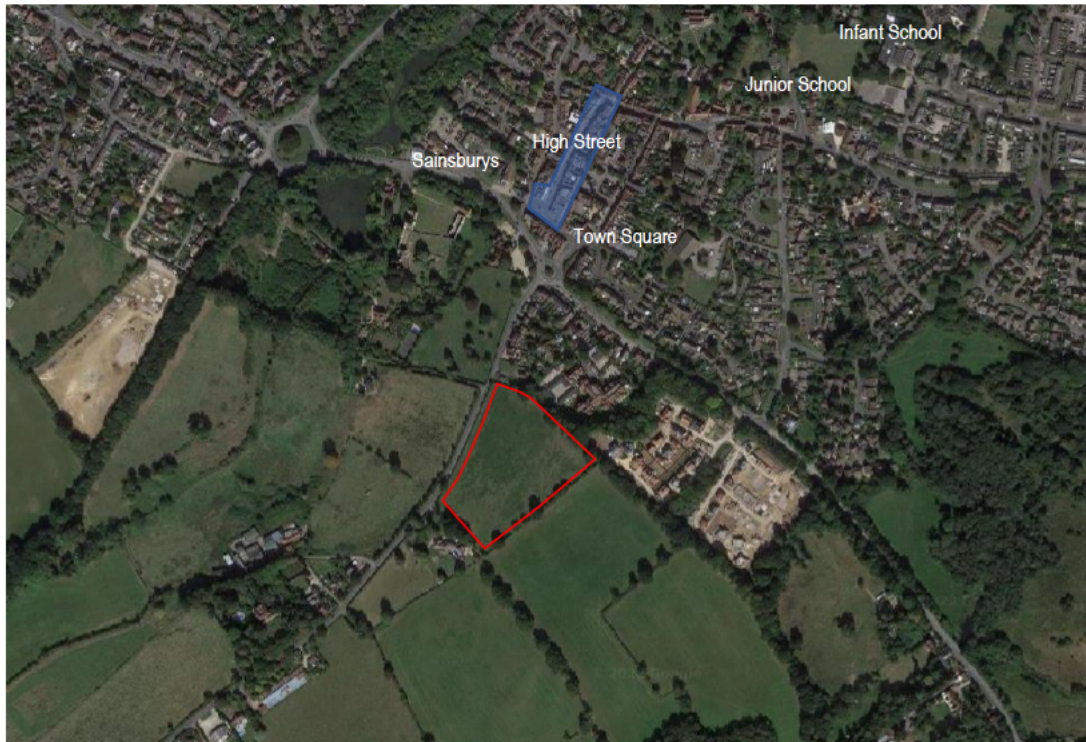
1.12 The site measures approximately 2.62 hectares and is currently an undeveloped parcel of land that adjoins the settlement boundary of Bishop's Waltham to the south-east. The site is situated between existing dwellings and the character of the site is influenced by the presence of these dwellings and the urban edge of the settlement to the north.

1.13 The site is sustainably located within walking distance of the town centre and is connected by a footpath. The measured walking distance between the centre of the site and the clock tower in the centre of St George's Square is just 395 metres, this being a comfortable, convenient and very sustainable five-minute walk.

1.14 There are bus stops located at St George's Square within 400m of the site providing good connections to Winchester, Fareham and Portsmouth and numerous small settlements between, including Wickham and Swanmore. The site is a sustainable location for development in our view and this site represents a valuable opportunity for a development which would relate very well to the existing settlement.

1.15 The site was submitted via the call for sites exercise in 2021 and has been published in the SHELAA 2021 and assigned site the number 'BW12'. The site was considered by officers to have a capacity of 68 dwellings at a density of 30 dwellings per hectare; the

site was deemed to be deliverable and developable within five years. The site is shown outlined in red on the aerial photograph below and full details of our vision for the site are contained within the 'Botley Road, Bishop's Waltham Vision Document' provided at **Appendix 1** of these representations.



Aerial Photograph Showing the Site Outlined in Red, by Courtesy of Google Maps © All Rights Reserved

These Representations

1.16 These Representations follow previous representations made as part of the Local Plan Regulation 18 Stage 1 consultation in December 2022 and we would be welcome an opportunity to discuss these representations with officers in due course.

1.17 The structure of these representations is set out as follows:

- **Section 2** – provides comments on the Foreword and Introduction to the Local Plan;
- **Section 3** – provides comments on Chapter 3 of the Local Plan and counters some of the claims **made** regarding the Duty to Cooperate and the work of the Partnership for South Hampshire;

- **Section 4** – provides comments on Chapter 6 of the Local Plan relating to the sustainable transport and active travel;
- **Section 5** – provides comments on Chapter 9 of the Local Plan and deals with various matters including the need for new homes, the need for affordable housing, the settlement hierarchy, matters of supply and the windfall allowance;
- **Section 6** – provides a summary and conclusions.

2.0 Local Plan Foreword and Introduction

- 2.1 Paragraph 1.1 of the Foreword sets the tone for the local plan in our view, and sadly it sets a rather negative tone. It is far removed from the positive and pro-active tone that we need locally, regionally and nationally if we are to provide the homes and employment opportunities that this country so desperately needs and the Government now encourages.
- 2.2 Paragraph 1.1 states *“The Local Plan sets out our vision and objectives for future development across the Winchester district outside the South Downs National Park – in Winchester itself, our market towns, villages and countryside. It includes new Development Management policies against which planning proposals will be assessed for housing, employment and open space as well as the specific sites needed to deliver the growth we have to accommodate over the next 15 years or more.”* (underlining is our emphasis)
- 2.3 It doesn't refer to development sites that the Council 'should' deliver to improve the lives of its citizens, it is a rather apologetic stance, almost an excuse, alerting the reader to the fact that Winchester 'has to' and rather than wishes to.
- 2.4 Paragraph 1.2 states *“This Local Plan will run until 2040 and will represent a significant change from our previous plan.”* I am afraid we do not regard the local plan as a significant change from the current adopted plan at all. From our perspective, the local plan relies heavily on development policy strategy approaches and development sites being carried forward from the local plan it seeks to replace.
- 2.5 Paragraph 1.2 also acknowledges that *“Our area has an above average carbon footprint”* and we believe this is a result of the Council's approach in previous local plans to preserve the current settlement hierarchy and gaps between settlements, resulting in a disparate approach to development, with numerous small settlements that lack the quantum of development and services to promote sustainable living patterns.
- 2.6 Paragraph 1.2 also acknowledges, perhaps, the most significant problem in the Winchester District, being *“We also face a challenge of affordability. It's ever harder for all ages, and especially younger people, to find a suitable house they can afford”*. This is indeed a challenge, but of course, one of the easiest ways to increase affordability is to increase supply. The current adopted local plan throttles supply in our view and has led to the current affordability challenges.

- 2.7 Most alarming in the tone of the introduction is an acknowledgment that *“Over 90% of the sites that developers put forward have not been included in this plan.”* To us, this is almost included as a badge of honour, a political statement. To us, it shows that the development industry is willing and ready to help Winchester and the wider sub-region to grow and meet its objectively assessed needs; but the Council appears to start off on a defensive footing, resisting development in favour of preservation.
- 2.8 This defensive stance is further acknowledged at paragraph 1.4 *“At the time of writing, the Government is consulting on a new National Planning Policy Framework (NPPF) with considerably higher housing requirements for the district and new rules for how Local Plans are decided. Continuing with this Local Plan, alongside a commitment to commence plan-making in the new plan-making system at the earliest opportunity to address any shortfall in housing need, is consistent with those rules, enables us to positively meet the challenge laid out by Government and also ensures that our new Development Management policies apply while we quickly develop our follow-up Plan.”*
- 2.9 I am afraid that, from our perspective, Winchester City Council appears to have rushed this local plan through so that it can seek to avoid meeting the actual housing need of the District.
- 2.10 Paragraph 1.4 acknowledges that the local plan would effectively be out of date upon adoption and the Council commits to an immediate review of the Local Plan, a so-called “follow-up Plan”.
- 2.11 Notwithstanding our opinion that it would have been better to have paused local plan production, amend the plan to consider the new Standard Method, we feel it would be a better Local Plan if it included a timetable of the local plan review. The timetable offered on page 4 stops at the local plan monitoring stage.
- 2.12 The local plan would be better, and indeed sound if it provides suitable reassurances that a local plan review is timetabled for speedy delivery. Without such a timetable, the commitment to an early review is not credible. In our experience, local planning authorities that are resistant to development will stall and stymie local plan production. In order for this local plan to be considered sound, we request that it be amended to include a timetable setting out all of the stages of an immediate local plan review. Such a modification would address some of our concerns.
- 2.13 Paragraph 2.11 acknowledges that *“a number of factors have changed”* and these have an impact *“particularly in relation to development viability”* and these changes include:

- The City Council has declared a climate emergency and has an ambition to be a carbon neutral district by 2030;
- There is requirement for biodiversity net gain;
- There are new requirements and associated costs to mitigate the impacts of additional nutrients on the quality of the water environment of nationally protected sites.

- 2.14 Paragraph 2.12 acknowledges that the above factors “*add to the cost of development*” and in our view, it is prudent for a local plan to acknowledge that some sites might not come forward, and other sites will be slower to come forward because of market pressure and these increased burdens on development viability. In our opinion, the Local Plan needs to provide an over-supply of sites for homes, and at present it provides a shortfall.
- 2.15 Paragraph 2.16 introduces the evidence base for the Local Plan and the somewhat delayed timetable to date, including public consultation that took place in 2018, 2021 and more recently in 2022 in relation to the Regulation 18 Consultation. It is worth noting that a lot has changed since 2018 and the Local Plan acknowledges (for example) how the Covid-19 pandemic has influenced the homes that people want and how we work differently.
- 2.16 Paragraph 2.20 explains how the Local Plan has been prepared alongside and been informed by a Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) in one combined Integrated Impact Assessment (IIA). We support this combined approach.
- 2.17 As we will set out later in these Representations, we do have some concerns with the way some sites have been assessed via the IIA, and what seems to be, in our view, not enough exploration of alternative delivery options to address the true housing need or the growth agenda of the region.
- 2.18 Under the banner of ‘Duty to Cooperate’ paragraph 2.22 advises that the city council has worked positively and collaboratively with neighbouring local planning authorities and other bodies to identify and seek to address any strategic, cross-boundary matters.
- 2.19 Paragraph 2.22 also refers to Statements of Common Ground which set out how the Council has worked with its neighbours.

- 2.20 Paragraph 2.23 confirms that *“the council and a number of neighbouring authorities are members of the Partnership for South Hampshire (PfSH) which seeks to encourage sustainable, economic led growth and regeneration of the South Hampshire sub-region.”*
- 2.21 As we set out in these Representations, we note that the Statements of Common Ground raise some doubt and show that more can be done; we make recommendations as to how the Local Plan can be modified to ensure its soundness.
- 2.22 The National Planning Policy Framework (‘NPPF’) imposes a ‘Duty to Cooperate’ on Local Planning Authorities (‘LPAs’) to work with neighbouring LPAs to meet their unmet needs and to produce Statements of Common Ground to confirm the agreed approaches.

The Partnership for South Hampshire

- 2.23 Winchester City Council is in a partnership with eleven other LPAs known as the Partnership for South Hampshire (‘PfSH’) which seeks to encourage sustainable, economic led growth and regeneration of the South Hampshire sub-region and importantly promotes the ‘Duty to Cooperate’ across boundaries on matters of strategic importance, including housing distribution.
- 2.24 We support the Council in their desire to work positively and collaboratively with neighbouring local planning authorities and other bodies to identify and seek to address any strategic, cross-boundary matters.
- 2.25 We note that the PfSH work is non-statutory (i.e. not part of the formal development plan) but we have also seen first-hand the PfSH work being endorsed by Planning Inspectors during examinations of local plans. We feel it is right that PfSH’s work is used to help inform the development of the local plan which includes a Spatial Position Statement (‘SPS’), as detailed below. The SPS is important as a key expression of joint planning and how the Council fulfils its Duty to Cooperate requirements. It is therefore, an agreed strategic planning approach, as is documented in the PfSH Statement of Common Ground, which has been signed by all member authorities, including Winchester City Council.
- 2.26 We note that that the latest SPS for the sub-region for the period to 2036, together with an overall vision and strategic direction covering the period to 2050 was published in December 2023. Whilst this SPS is effectively out of date, and will be out of date once the NPPF is amended in November or December 2024 as expected, it does provide evidence of the housing shortfall that the Local Plan should be trying to address.

- 2.27 The SPS sets out the current level of housing need and supply in South Hampshire and identifies a supply shortfall in meeting housing needs across South Hampshire.
- 2.28 Table 1 of the SPS sets out the overall anticipated housing need and land supply position for the period 2023-2036. Overall this highlights that there is an acknowledged shortfall of 11,771 dwellings in the PfSH area.
- 2.29 It is expected that as individual Local Plans progress, each Local Planning Authority will consider whether they can meet their need and some of the unmet need in the PfSH area.
- 2.30 To help plan for the unmet need PfSH states that *“In the SPS, broad areas of search are identified which could be considered in the future to help address any remaining shortfall in supply. Whether these sites are progressed, is to be considered and decided by each of the individual Local Planning Authorities through the preparation of the respective Local Plan”*. Underlining is my emphasis.
- 2.31 It is disappointing that there is no clear direction in how this Local Plan or any other local plan being prepared in the PfSH area will actually, tangibly meet this unmet and chronic housing need.
- 2.32 It is also disappointing that PfSH has not published any further updates on the broad areas of search, or published any update following the publication of the proposed NPPF amendments and proposed revisions to the Standard Method for calculating housing need.
- 2.33 It seems that the Local Plan wishes to defer the matter for a point in the future and does not properly address this unmet need. This lack of positivity is at odds with the NPPF and leads us to conclude that the Local Plan is not positively prepared and is not sound in its current form.
- 2.34 This approach by the Council is, in our view, contrary to both Policy SPS8 of the PfSH SPS and contrary to the NPPF. We recommend that additional sites are identified in the Local Plan that will help meet the unmet need.
- 2.35 The Local Plan fails to acknowledge the significant level of the shortfall. It is clear that the overall level of shortfall can and will change over time and whilst we do not expect Winchester to accommodate the entire unmet need; we would expect the Local Plan to propose a meaningful contribution towards the unmet need.

- 2.36 For example, a contribution amounting to 20% of the unmet need (approximately 2,350 dwellings) would make a small difference, but would not expose the council to delivering more than any future quantified level of unmet need that was established in local plans.
- 2.37 The second reason why the Local Plan's response to the SPS is insufficient is because it fails to recognise the agreed positive strategic approach designed to address the shortfall as set out in Policy SPS8. Winchester City Council has willingly signed up to the PfSH Statement of Common Ground, but has declined to make any positive move to implement the agreed strategic approach.
- 2.38 The Local Plan and supporting evidence show that the Council has not seriously considered the potential contribution that could be made by a 'broad area of search for growth' located within the Winchester District. This is despite the District being in a much better position than many PfSH members to make a contribution, due to the relatively fewer constraints in District. We consider that the fact that the council proposes to make a small contribution is clearly not a 'positive' or 'sound' approach with regard to paragraphs 11 and 35 of the NPPF.
- 2.39 The final reason why Winchester's response to the SPS is insufficient is that the need to take account of cross-boundary issues and to consider any unmet housing need from neighbouring authorities emerged as a key issue from past local plan consultations and has been largely ignored.
- 2.40 We note from the Statements of Common Ground (SoCG), particularly those made with Portsmouth City Council and Havant Borough Council that there are areas where the Duty to Cooperate could be improved.
- 2.41 We note from the SoCGs that WCCs intention is to meet the Standard Method housing need of the Local Plan area and in addition to this, the Local Plan makes provision for an "unmet needs allowance" to help with meeting the unmet needs of neighbouring authorities in accordance with the SPS.

Havant Borough Council

- 2.42 Through Havant Borough Council's 'Interim' SoCG on the Draft Winchester Local Plan (Regulation 18) they noted that a buffer is provided to contribute to the PfSH shortfall and *"confirmed the Council's position of concern that in the absence of a Joint Strategy which shows how the development need of the South Hampshire sub-region will be met in full, there is no clear mechanism to address the significant need arising from Havant and the wider sub-region."*

- 2.43 At the time of publication of their interim SoCG, Havant Borough Council had not reviewed the Winchester City Council Proposed Submission Local Plan (Regulation 19). It intends to do so as part of the six-week public consultation that started on the 29th August 2024. Nonetheless, HBC notes that whilst WCC had responded to the March 2024 request, WCC did not offer to accommodate the unmet need from Havant Borough nor did WCC offer to engage regarding the preparation of the Winchester Local Plan.
- 2.44 HBC reports that no other offers were received from other local authorities and as such there is an unmet housing need of 4,309 remaining at the point of signature of the interim SoCG.
- 2.45 Of concern, Havant Borough Council notes that there has been no engagement between the Regulation 18 and Regulation 19 stages from Winchester City Council in order to address the matters raised in earlier representations or the letter of 5th March 2024.
- 2.46 Havant Borough Council, like us, is mindful that the NPPF indicates that unmet need from neighbouring areas should be taken into account in establishing the amount of housing to be planned for.
- 2.47 Given their concerns, HBC wrote *“whilst Havant Borough Council will undertake a full review of the Winchester City Council Proposed Submission Local Plan (Regulation 19) as part of the 6 week public consultation, it reserves the right to raise concerns regarding the soundness and legal compliance of the plan through the consultation and examination. This would include amongst other matters consideration of whether the Duty to Cooperate can be considered to be met.”*
- 2.48 We note that the agreed position confirmed by both WCC and HBC is *“that the ‘unmet needs allowance’ is not apportioned to any one local authority with unmet need and that the level of unmet need in the sub-region exceeds the ‘unmet needs allowance’.*

Portsmouth City Council

- 2.49 The SoCG signed by WCC and PCC states that in January 2024, *“PCC contacted WCC requesting that WCC helped to accommodate Portsmouth's unmet housing need. Following a meeting between Officers from both councils on 12th April 2024 a formal response to this Duty to Co-operate letter was sent from WCC to PCC on 22nd May 2024”.*
- 2.50 The SoCG also notes that PCC *“had an advisory call from the Planning Inspectorate (Louise Crossley)”* and the advice to PCC was that *“WCC should identify geographically appropriate sites for meeting the unmet need arising from specific neighbouring LPAs. It*

would be necessary for WCC to SA the choice of these sites and monitor their development.”

- 2.51 The SoCG also reports that *“the Inspector sent a written report that responded to specific questions asked by Portsmouth. This included a question in regard to Winchester District Council's housing land supply buffer, specifically whether WCC's Housing land supply buffer should be a general figure to meet the needs of PfSH or should it allocate to specific neighbouring authorities with an unmet need a portion / proportion of this housing land supply buffer.”*
- 2.52 PCC asked their inspector for her view on this, who advised *“It will be for that examination (Winchester's) to resolve that. You (Portsmouth) could make reps on their plan for that Inspector to consider”*.
- 2.53 It is clear to us that PCC considers that WCC should identify specific sites in the Local Plan to help meet PCC's unmet need and other LPAs unmet need as necessary and the sites should be located close to the boundaries of the relevant LPAs and within the relevant housing market area.
- 2.54 It is also clear from the SoCG that agreed position is this: WCC acknowledges that PCC has formally approached Winchester District to request help in meeting the City's unmet housing need of 219 dwelling per annum. WCC have confirmed that the unmet need allowance of about 1,900 dwellings set within the Local Plan can contribute to meeting the needs of PfSH authorities.
- 2.55 In summary, the duty to co-operate letters that have been received from Portsmouth and Havant Borough Councils have asked for assistance to meet their unmet and this leads us to conclude that, without modification, the approach is not consistent with paragraphs 11 and 35 of the NPPF, nor with the agreed joint strategic approach set out in the SPS and PfSH Statement of Common Ground.
- 2.56 It is clear to us that Winchester City Council can provide further opportunities to accommodate a meaningful portion of the proven sub-regional unmet need and anticipated additional need from LPAs such as Portsmouth and Havant that cannot currently accommodate their own needs. The Local Plan should identify more sites for homes in sustainable locations, including on land in and around Bishop's Waltham, being the largest settlement in the District that falls within the PfSH boundary, a location that accords with settlement hierarchy and meets the desire of the Council to create 20-minute neighbourhoods.

Broad Areas of Search for Growth

- 2.57 On the 6th December 2023, Graham Tuck, the Chairman of the PfSH Planning Officers Group presented a report to the PfSH Joint Committee entitled “*STATEMENT OF COMMON GROUND – Broad Areas of Search for Growth Assessments*”. The report referred to Appendix 1, being a separate report entitled “*Identification of Broad Areas of Search for Growth Assessments, December 2023*”.
- 2.58 The report sets out the proposed Broad Areas of Search for Growth Assessment evidence base document to be noted by the PfSH authorities.
- 2.59 Paragraph 3 advises that “*The Broad Areas of Search for Growth Assessments work has employed a constraints mapping approach to assess the potentially most sustainable broad locations, at the sub-regional scale, where it would be appropriate to identify sites for allocation in local plans*”.
- 2.60 Paragraph 4 explains that “*The evidence base document is relatively short and succinct*” and “*contains a series of maps that apply the NPPF para 11 footnote 7 constraints (which have the strongest level of protection) and other important constraints*”.
- 2.61 Paragraph 4 also acknowledges that “*The constraints mapping has also sought to identify the most accessible areas in transport terms and, by mapping these, the least accessible areas, i.e. inaccessibility as a constraint that can be applied alongside the environmental constraints.*”
- 2.62 The constraints mapping has led the PfSH to identify five greenfield “*Broad Areas of Search for Growth*”, namely:
- South-east/east of Eastleigh Town (Eastleigh)
 - Southleigh (Havant)
 - East of Romsey (Test Valley)
 - South-west of Chandler’s Ford (Test Valley)
 - East of Botley (Winchester).
- 2.63 Worryingly, the PfSH report acknowledged that significant work is still required:
- Paragraph 5 “*there are some ‘other important constraints’ that apply to some of these areas. Consideration will need to be given to the protection of the best*

and most versatile agricultural land and whether strategic/settlement gaps can be revised and still achieve their purpose at local plan stage.”

Paragraph 8 *“It should be noted that at local plan preparation stage further detailed work will be required in terms of environmental and transport constraints. In particular, much more detailed transport assessment work will be needed, and this will be undertaken in conjunction with the transport authorities.”*

- 2.64 Essentially, and in our experience, there are many more hurdles in the way of any strategic scale development sites being identified. Identifying strategic sites takes a long time to come forward; there are landowner constraints, technical constraints, viability constraints, and of course there are environmental constraints; and we suspect that it will be many years before a strategic development site is identified; and this will be too late to address the identified unmet need that exists today.
- 2.65 Given the relatively small amount of work that has been carried out to date, and noting that PfSH has little resources; it is perhaps no surprise, that to date, there has been no update from PfSH on the broad areas.
- 2.66 Paragraph 3.2 of the appendix to the report acknowledges that the matter is challenging, it states: *“PfSH recognises that, depending on methodology and the weight given to various constraints, achieving required levels of sustainable growth in South Hampshire is challenging”*.
- 2.67 We are of course pleased that PfSH has identified areas to search for the potential to accommodate strategic scale development, but it is just the beginning of what we consider will be a long and potentially ineffective process.
- 2.68 The need for more homes is urgent, and LPAs cannot wait for PfSH, in the interim, LPAs must do more to accommodate housing growth.
- 2.69 So, we reiterate, we are pleased that PfSH has finally identified five broad areas of search, but we are concerned with the pace of PfSH’s work. Paragraph 1 of the report confirms the lengthy timescales to date, it states: *“The Joint Committee agreed a draft framework for the Statement of Common Ground (SoCG) at its meeting in October 2019. The Joint Committee subsequently agreed a formal SoCG in September 2020 and updated versions in October 2021, December 2022 and September 2023. The SoCG sets out the key strategic cross-boundary planning issues and the programme of work that will lead to the preparation of a new Spatial Position Statement”*.

- 2.70 Effectively, what PfSH has achieved to date is a partial evidence base that identifies “broad” areas where officers will “search” for areas where growth can be accommodated.
- 2.71 We have no confidence that PfSH will identify actual development sites within the next five years, and as such, the Winchester Local Plan should do more to accommodate the unmet housing need in the housing market area.
- 2.72 We note that the Council considers that there is no clear evidence on unmet needs, we consider that it is evident from the PfSH SPS that there are unmet needs across South Hampshire between 2023 and 3036. We do agree that some of this unmet need could be delivered by some of the other Local Planning Authorities such as Eastleigh; but we note also that Gosport, Havant, Portsmouth and Southampton are constrained by their urban factors and in the case of the New Forest they are also constrained by a National Park designation.
- 2.73 It is therefore important in our view that the Council starts planning now to increase the supply of homes in the Local Plan to address some of the unmet need in South Hampshire to result in a sound local plan.

3.0 Local Plan Chapter 3: Vision for the Area

3.1 Paragraph 3.1 of the Local Plan explains that Local Plan covers the whole of Winchester district, except for the part which falls within the South Downs National Park.

3.2 Paragraph 3.1 then explains that the area contains a variety of communities and places which perform distinct roles and have their own context and relationships with their surrounding areas. Of key consequence for the strategies in the Local Plan, paragraph 3.1 acknowledges that *“the district has been divided up into the same broad geographical areas in the same way as the previously adopted Local Plan”* (underlining is our emphasis).

3.3 The three broad areas are:

- **Winchester Town** - As the largest settlement in the district and county town, Winchester is an important centre for housing and employment activities.
- **South Hampshire Urban Areas** – This spatial area has been defined as a local response to planning for the part of the district which lies within the Partnership for South Hampshire (PfSH) area, with strong economic and social ties to the urban areas to the south.
- **Market Towns and Rural Area** - This area includes many smaller settlements, which range from larger villages to small hamlets.

3.4 Strategic Policy SP2 entitled ‘Spatial Strategy and Development Principles’ states that *“The council will support the delivery of new housing, economic growth and diversification, as appropriate for each of the three spatial areas, through the following development strategy:*

- i. *Winchester Town will make provision for about 5,640 new homes through a range of accommodation, including the completion of the Kings Barton development and the redevelopment of Sir John Moore Barracks, to meet the needs of the whole community and to ensure that the local economy builds on its existing and growing strengths in higher education, creative and media industries, and other knowledge-based activities, whilst respecting the town’s special heritage and setting.*
- ii. *The South Hampshire Urban Areas will make provision for about 5,650 new homes and contribute towards meeting the Partnership for South Hampshire*

strategy of improving economic performance, primarily by providing major housing, economic growth and community and physical infrastructure in two sustainable new neighbourhoods at Newlands (West of Waterlooville) and North Whiteley (Whiteley).

iii. The Market Towns and Rural Area will make provision for about 3,850 new homes and support economic and community development that serves local needs in the most accessible and sustainable locations (see the rural settlement hierarchy in Policy H3), which promote the vitality and viability of communities, and maintain their rural character and individual settlement identity.”

- 3.5 We broadly support this approach; but we do consider that there is a greater opportunity to allow all three areas to play a greater part in driving much needed growth in the PFSH area. As cited above, paragraph 3.1 confirms that the Local Plan approach to identify three broad geographical areas is the “*same way*” as before, and in our opinion, particularly with paragraph 1.2 confirming that the area “*has an above average carbon footprint*” this demonstrates that simply repeating the approach is perpetuating problems of poorer sustainability and poorer affordability as compared to other LPAs in the PFSH area.
- 3.6 Furthermore, we note a constant tension between what ‘Winchester’s City Centre’ actually is, versus what the Council appear to want it to be. For example, the Local Plan is rightly proud of Winchester’s status as a Cathedral City, and it also rightly proud of its heritage and historic environment stemming from its former role as the Capital of England, and yet, the strategy that underpins the District’s Settlement Hierarchy refers to “Winchester Town”. This tension is also expressed at paragraph 12.1 which states “The area referred to by the city council as Winchester Town consists of the Winchester Wards plus the adjoining built up areas of Badger Farm, Oliver’s Battery and Harestock, as defined on the Policies Map” (underlining is our emphasis).
- 3.7 The “Local Plan Vision” set out on page 19 states, for example, “The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character” (underlining is our emphasis). In our opinion, this demonstrates a policy position of preservation and not growth.

3.8 We consider that the City of Winchester and its surrounding settlements have a much greater role to play in the region than the Local Plan suggests, and we explore this topic further later in these Representations.

4.0 Local Plan Chapter 6: Sustainable Transport and Active Travel

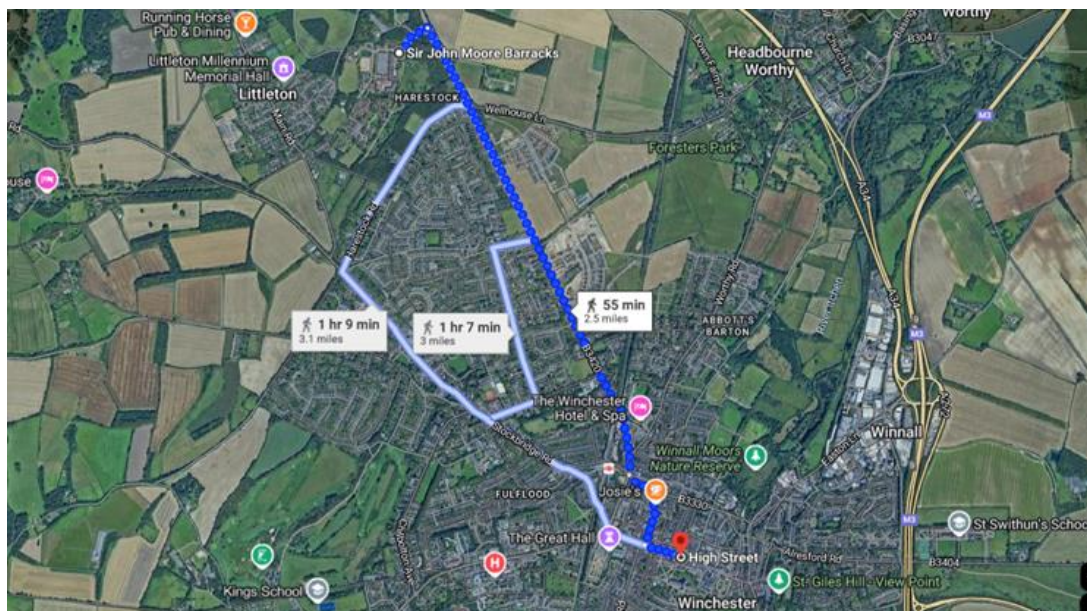
A Common Theme

- 4.1 With regards to travel patterns, the need to reduce the District's carbon footprint, and the importance of active travel is first introduced in earlier chapters. Paragraph 5.1 acknowledges that *"Achieving high quality, well-designed places is a critical part of place making and an integral component of climate change and the city council's journey to net zero and the health and well-being agendas."*
- 4.2 Paragraph 5.2 continues this acknowledgement and states *"In order to be successful and achieve this, the design of new development needs to respond positively to local distinctiveness, have active frontages and encourage residents to cycle and walk through the development, as well as providing strong connections to existing communities, with access to public transport links".*
- 4.3 Paragraph 6.1 advises that *"Mitigating and adapting to climate change and reducing the carbon footprint of the district is an important part of the Local Plan. There needs to be a step change away from continued reliance on private cars as a main travel solution and the use of sustainable and active means of travel must be prioritised and made more attractive options."*
- 4.4 Paragraph 6.2 advises *"The city council's climate change targets for the district and objectives of the City of Winchester Movement Strategy, Air Quality Action Plan and Carbon Neutrality Plan will only be met by ensuring that we prioritise development towards sustainable transport modes of travel. These include safe and accessible means of transport with an overall low impact on the environment which includes walking, cycling, ultra-low and zero carbon emission vehicles, car sharing and public transport. This is because transport is one of the highest contributors towards the carbon footprint of the district and the private car is the least sustainable form of transport."*
- 4.5 Paragraph 6.3 advises that *"Transport provision and in particular access to sustainable public transport varies considerably across the district, with relatively good accessibility in Winchester Town, ranging to very poor accessibility in some of the more remote rural areas. The main transport issues relate to the need to reduce carbon emissions, road safety, accessibility, congestion and pollution to improve air quality. The biggest challenges in accommodating development will be in relation to ensuring the development generates as little new private car traffic movements as possible and*

providing the necessary infrastructure to accommodate more sustainable means of travel and ensure access to facilities and services.”

4.6 Paragraph 6.10 acknowledges that “Whilst the Winchester Vision is solely focussed on Winchester Town, the work that was undertaken as part of this commission focussed on the need to reduce the reliance of the private motor car and promote the concept of the 15 minute cities. Given that there is a climate emergency, it is considered appropriate to embed the concept of 20 minute neighbourhoods into the Local Plan (rather than 15 minute cities) and apply these principles in the parts of the district where this is achievable whilst recognising that the concept of 20 minute neighbourhoods does not work for all of the district.” We support the concept of 20 minute neighbourhoods.

4.7 Paragraph 6.11 states “The Local Plan has a key role to play in promoting sustainable transport modes of travel and how the plan can be used to promote the concept/principles of 20 minute neighbourhoods. It can focus new development in the most sustainable locations with high quality infrastructure to promote active travel and access to public transport buses and trains to connect together neighbourhoods, facilities and services.” We agree, it could do, but in our view, there is a definite mismatch between the policy aspirations of the Local Plan and the reality.



Walking distance between Sir John Moor Barracks and the High Street

4.8 Using the largest ‘new’ housing allocation in the Local Plan as an example, we see that the Sir John Moore barracks is not located in a sustainable location at all, and it appears to be an allocation chosen due to its status as a brownfield site rather than location. As shown below, Google mapping advises the walking distance from the barracks entrance

to the high street is 2.5 miles, a 55 minute walk. It is therefore difficult to envisage how the site would help to deliver a 15 minute city or indeed a 20 minute neighbourhood.

- 4.9 We consider that there are better options for more sustainable patterns of development, principally around Bishop's Waltham which is a highly sustainable and high order settlement with an excellent range of facilities and services, as identified in the Settlement Hierarchy Report of November 2022 and is ranked Tier 1 on the settlement hierarchy. Bishop's Waltham is very compact, and can accommodate more growth and can help achieve the Local Plan aims of 20 minute neighbourhoods.
- 4.10 Whilst reviewing the proposed allocation for the Sir John Moore Barracks, it is also important to note that the housing delivery table advises that the site can deliver 900 dwellings, but the allocation itself refers to 750 to 1,000.
- 4.11 The text of the allocation also sets out the constraints of the site which include trees, contamination, a SINC, groundwater and flooding to name a few.
- 4.12 Paragraph 12.15 appears to acknowledge that the vague and imprecise nature of the allocation stems from the fact that masterplanning of the site is still at very early stages, it states: *"The site is defined in a broad way, to enable a comprehensive approach to be taken regarding the future development of the land, which will be subject to a master planning process. This does not mean therefore that all of the site included in the plan is proposed or suitable for built development. Part of the site comprises 'previously developed land' so it is important to make the full use of the site's potential, within the existing constraints. Therefore, a working assumption has been made that the site could accommodate about 900 dwellings"* (underlining is our emphasis).
- 4.13 Whilst we support the allocation overall, we consider that the Local Plan needs to allocate more sites to provide more choice and alternatives because the timetable for delivery of the barracks will slip and development will be delayed. Specifically, more small greenfield sites like our client's site should be allocated as part of a buffer and to help bolster supply.
- 4.14 Barton farm, for example, which is a 'rollover' allocation in the Local Plan had a very long and tortuous planning history which started with a Scoping Opinion in 2009 and the first dwelling was not completed until April 2017. The Local Plan advises that 1,541 dwellings remained to be developed at April 2023. This equates to a poor 459 dwellings completed over the six-year build period, or just 76 dpa. Lichfield's 'Start to Finish' paper

cites numerous examples of major sites stalling. This Local Plan will need to allocate more sites to be sound.

5.0 Local Plan Chapter 9: Homes for All

- 5.1 We are concerned with paragraph 9.1, which states *“One of the aims of the Council Plan is to provide ‘Homes for All’ and the Government has also made it very clear that it wants to boost the supply of new homes, to about 300,000 homes per annum nationally. Local plans are required to be based on evidence and to identify and plan for the various housing needs arising. It is also very important to deliver the right types and sizes of homes, including affordable homes, in locations that are sustainable. A significant amount of development is already planned in Winchester district and the minimum amount of additional housing that is required in the future will be set by the Government”* (Underlining is our emphasis). This paragraph acknowledges the Government’s ambitions for much needed housing delivery and acknowledges that more is required, but leaves it to a later ‘future’ date.
- 5.2 In order to consider whether the Local Plan has been prepared in a positive manner, it is worth reflecting on the approach taken by WCC.
- 5.3 In our opinion, WCC has chosen to respond to the proposed transitional arrangements set out in the proposed NPPF and after a long pause, has suddenly and with great urgency, progressed at speed with the publication of the Regulation 19 Local Plan. WCC has chosen not to respond to the proposed standard method.
- 5.4 Notwithstanding our opinion that the proposed transitional arrangements in the proposed NPPF are flawed; it is disappointing that WCC is ‘gaming the system’ to stymy and delay the true level of housing growth required; this is not a positive approach being taken by WCC; and we hope that this Local Plan can be rescued with substantial modifications.
- 5.5 Paragraph 9.3 further demonstrates the flawed nature of the Local Plan, it acknowledges that *“The minimum housing requirement for the district is set by Government, based on a ‘Standard Method’ which is calculated taking account of expected future household growth and local housing affordability. These factors can change annually and the Local Plan is based on the current ‘Standard Method’ of calculating a housing figure.”*
- 5.6 Of course, we all know that the Local Plan is based on the “current” ‘Standard Method’ it is not based upon the Standard Method that we expect to be in place when this Local Plan reaches examination.

- 5.7 Paragraph 9.4 confirms WCC's intentions, it confirms *"The current (March 2024) Standard Method figure is 676 dwellings per annum. The Strategic Housing Market Assessment (SHMA) assesses in detail the various types and sizes of homes that will be needed."*
- 5.8 Paragraph 9.7 correctly acknowledges that *"Additional housing in the right location can improve the sustainability of communities, including the regeneration of brownfield land, enhancing the viability of services such as shops and improving community cohesion through providing a range of housing to meet various needs."*
- 5.9 Paragraph 9.8 highlights the 'testing' of options that underpin the Local Plan, and we are concerned that for a district the size of Winchester, with all its inherent complexities, including National Park, PfSH designation and multiple settlements; that only four options were explored. Furthermore, we consider that the some of the options were in fact very similar and offered very little choice.
- 5.10 A number of key issues relating to the Homes for All topic were identified in the Strategic Issues and Priorities consultation document (SIP), published in February 2021. In particular, four possible 'spatial distribution' options were set out, looking at alternative ways of provided the level of housing likely to be needed.
- 5.11 Paragraph 9.9 confirms that the 'Strategic Issues and Priorities' consultation document only set out four *"possible spatial distribution options"* namely:
- Approach 1:** A development strategy based on the approach in the existing Local Plan of distributing development to a sustainable hierarchy of settlements.
- Approach 2:** To focus development on Winchester itself and other larger and more sustainable settlements.
- Approach 3:** A strategy that includes one or more completely new strategic allocations or new settlements.
- Approach 4:** A strategy of dispersing development around the district largely in proportion to the size of existing settlements.
- 5.12 Paragraph 9.10 confirms the findings of the consultation, and advises *"Approach 1 received the most support. It performed well in terms of its potential to support existing settlements, use of brownfield sites and reducing the need to travel. Approaches 2 and 4 were also fairly well-supported. Approach 3 received substantial objection and its*

promotion of large-scale greenfield development is at odds with priorities of maintaining the viability of existing centres, reducing travel and carbon emissions, and making best use of brownfield land.”

- 5.13 We are not surprised that Approach 1 received the most support, in our experience a ‘status quo’ option usually does. We are also not surprised that Approaches 2 and 4 were also fairly well-supported because in our opinion they are very similar options.
- 5.14 Finally, of course Approach 3 received substantial objection, and that we feel was bound to happen. WCC presented the Approach in a way that was always going to gather objections.
- 5.15 In our opinion, the consultation options were heavily biased towards the housing strategy of the adopted local plan and as such were flawed. More options should have been consulted upon and tested, including perhaps a garden village because it has been promoted before, multiple strategic allocations, and an approach that would propose a greater proportion of development in the PFSH area and higher rates of delivery above the ‘do minimum’.
- 5.16 Paragraph 9.11 confirms the ‘do minimum’ starting point taken, it states *“The Local Plan is required to plan for at least the level of housing established using the Standard Method, and to take account of the housing needs of other authorities that cannot meet their own needs in full. It is for the Local Plan to establish a sustainable strategy for accommodating this development. Taking account of the response to the SIP consultation, Sustainability Appraisal of the options, the evidence base and updated information on housing requirements and supply, the approach proposed below has been developed, based on Approach 1 but updated and modified to include elements of Approaches 2 and 4.”* (underlining is our emphasis)
- 5.17 Paragraph 9.14 provides further acknowledgement of the direction of travel of Government housing policy and the need for neighbouring LPAs to cooperate, it states *“The Government has made it very clear that it wants to boost the supply and delivery of new homes and it expects the ‘Standard Method’ to be used as the starting point to set the housing requirement for the district. In addition, the ‘Duty to Cooperate’ requires that account is taken of any needs that cannot be met by neighbouring areas in establishing the housing requirement. These requirements should be the basis for the Local Plan unless this threatens the protection of areas or assets of particular importance, or the adverse impacts would outweigh the benefits (see NPPF paragraph 11b).”* The Council

acknowledges that “the Standard Method calculation changes annually” with the position at March 2024 being 13,565 dwellings.

- 5.18 Paragraph 9.15 and the accompanying table confirms that WCC is using an old figure, it states “The Standard Method need is therefore currently 13,565 dwellings for the district over the Local Plan period to 2040. Within southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full and the Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement to address this” (underlining is our emphasis). This is very imprecise and further clarification is required, WCC should know, through proper cooperation with its neighbours how many have unmet needs.
- 5.19 Paragraph 9.16 acknowledges that the PfSH authorities are “taking a two stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full” and acknowledges that “in the short to medium term several authorities, including Winchester, should be able to exceed their Standard Method-based housing needs. Therefore an unmet needs allowance is provided in the spirit of cooperation required by government policy, to help contribute towards the PfSH shortfall” (underlining our emphasis). We raise concerns with the imprecise nature of the wording and consider that the housing crisis that we are in requires more than a token gesture and ‘spirit of co-operation’; we need bold moves, we need ‘a boost’ in supply.
- 5.20 Paragraph 9.17 acknowledges a large unmet need but defers the issue to the future, it states “In the longer term, the Spatial Position Statement identifies several ‘Broad Areas of Search for Growth’, where future local plans will assess the contribution they can make to ongoing unmet housing need in the sub region. These seek to focus development on locations with a relative lack of significant constraints and which are most accessible by public transport, walking and cycling, or have the potential to be made accessible. Seven areas of search are identified, including ‘East of Botley’ within the Winchester Local Plan area. These areas are not allocated for development by either the PfSH Spatial Position Statement or this Local Plan. Significant further work will be required to develop detailed site allocation proposals and masterplans. This work will take several years to complete and will be progressed through either a review of this Local Plan or a dedicated Development Plan Document” (underlining is our emphasis).
- 5.21 We are concerned that paragraph 9.17 sets out what could happen in the future, and we remain of the view, as raised in our Regulation 18 Representations in December 2022 that both WCC and PfSH need to increase the speed at which they progress their search. Until such time as PfSH publish genuine progress, we consider that the Local Plan needs

to allocate more land to meet the unmet need as opposed to ask everyone to ‘have faith’ that it will be dealt with one day.

Housing Topic Paper – Scale of the Unmet Need Allowance / ‘Buffer’

5.22 Paragraph 4.46 of the Housing Topic Paper states that *“the scale of any PfSH unmet remains uncertain and is unlikely to be fully clarified before the Regulation 19 Local Plan needs to be finalised. The draft Local Plan proposed a ‘buffer’ of 1,450 dwellings and it is recommended that the Regulation 19 Plan should take a similar approach, but attributing this towards unmet PfSH needs. This would be consistent with the first stage of the PfSH strategy for meeting housing needs, with the second stage (new strategic growth areas) following through a new plan if necessary”* (underlining is our emphasis).

5.23 In our view, the unmet need might be uncertain, but we can all be certain that it is real, and it is not diminishing. We can also be certain that strategic growth areas are required, and they take time to prepare. This Local Plan is wasting an opportunity to address unmet need in our view.

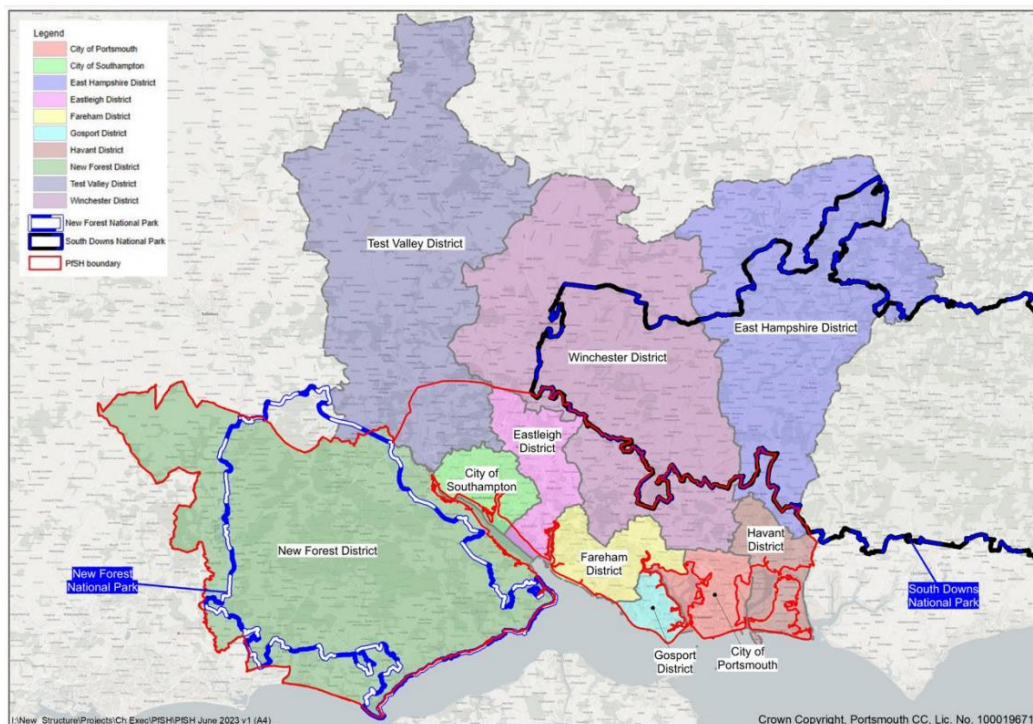


Diagram showing the PfSH members and their LPA boundaries and relationship to the PfSH area

5.24 We acknowledge that the LPA boundaries of the PfSH area do not neatly correlate with the actual boundary of the PfSH area, as shown in the PfSH’s own diagram above, but a quick totalling of the proposed NPPF Standard Methodology (30th July 2024), and

showing what the proposed changes might mean when aggregated over a typical 15 year local plan period shows us that the current unmet need is going to drastically increase within a matter of weeks. As a result, the Local Plan must do more to address unmet need that exists now.

PfSH LPA	Current Method DPA	Proposed Method DPA	Increase in DPA	Increased DPA Over 15 Years
East Hampshire	575	1,074	499	7,485
Eastleigh	645	902	257	3,855
Fareham	498	794	296	4,440
Gosport	339	465	126	1,890
Havant	508	874	366	5,490
New Forest	729	1,465	736	11,040
Portsmouth	897	1,098	201	3,015
Southampton	1,473	1,295	-178	-2,670
Test Valley	524	921	397	5,955
Winchester	676	1,099	423	6,345
Totals	6,864	9,987	3,123	46,845

Table showing current and proposed DPA requirements for the PfSH LPAs

5.25 Paragraph 4.47 of the Housing Topic Paper notes that “various comments on the draft Local Plan question how the 1,450 dwelling buffer was derived and/or suggest that the Local Plan’s spatial strategy should be changed to enable a significant increase in housing” and “Those promoting sites in the south of the District tend to suggest that their sites need to be allocated to help contribute towards meeting the PfSH need” and we too advocate this approach; particularly when noting the differences between the Housing Markets Areas reported by Icenl and acknowledged by WCC.

5.26 By any stretch of the imagination, an allowance of 1,450 is simply not enough when compared to what we know today, and what we believe is required.

Windfall Allowance

5.27 Paragraph 9.18 advises that WCC’s evidence “shows that windfall development makes a substantial contribution to housing provision and that this will continue” and cites evidence in the ‘Assessment of Windfall Trends and Potential 2021’.

5.28 Paragraph 9.20 states that 12% of the totally supply identified is expected from windfall development over the Plan period and this is based on cautious assumptions derived from the Assessment of Windfall Trends and Potential 2021.

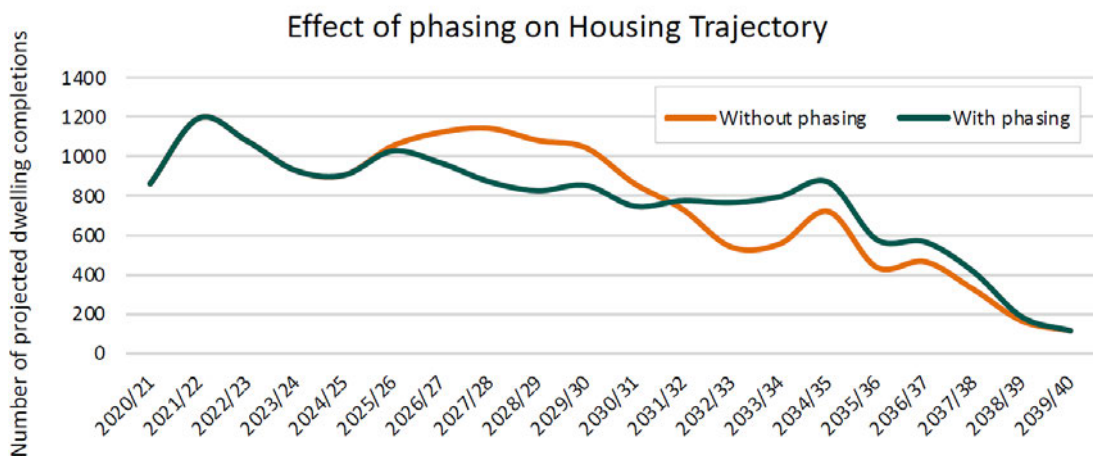
- 5.29 In our opinion, housing delivery is a complex issue, and is susceptible to the vagaries of the housing market and wider economy. Housing delivery consistently tracks wider economic trends, with some years delivering more, and some delivering less.
- 5.30 At the current time housing completions are being suppressed by a variety of factors including high interest rates, higher costs of borrowing, availability of mortgages, the cost of living, the rate of inflation, the costs of building materials, the supply of labour etc. and locally, the cost of nutrient mitigation and difficulties with BNG.
- 5.31 In our view that past higher levels of windfall supply are questionable and should not be used as a reason to stifle supply in this Local Plan.
- 5.32 No compelling evidence is provided to support the windfall allowance. Paragraph 72 of the NPPF requires LPAs to provide *“compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”*. In our view, and with a lack of compelling evidence, the proposed windfall rate cannot be relied upon and a buffer is needed to mitigate reliance upon it.
- 5.33 Paragraph 9.20 claims that *“sufficient housing provision is proposed to meet the Winchester district housing requirement”* which includes *“an unmet needs allowance of 1,900 dwellings as a contribution towards the unmet needs of neighbouring areas in South Hampshire”*. The paragraph also advises that 64% of the district requirement is met by dwellings that have either been completed or which already have planning consent, a further 12% are expected from windfall development therefore less than 25% of provision is from Local Plan allocations (either carried forward or new). Officers state that this gives a high level of certainty over the delivery of this additional housing.
- 5.34 Paragraph 9.21 advises that, in WCC’s opinion *“therefore, it is not necessary to include a ‘buffer’ to allow for non-delivery, especially given the high levels of housing provision expected in the early years of the Plan period”*. We disagree with this approach and consider that a buffer is always prudent and a 5% buffer should always be the minimum to help counter the vagaries of the housing market.

Strategic Policy H1 Housing Provision

- 5.35 The Local Plan, at Strategic Policy H1 included a contribution towards the unmet needs of adjoining areas and provides for the development of about 15,115 dwellings (net) in this period (excluding the South Downs National Park area). The policy directs development in accordance with the Local Plan’s spatial strategy as follows:

- Winchester Town – about 5,640 dwellings;
- South Hampshire Urban Areas – about 5,650 dwellings;
- Market Towns and Rural Area – about 3,825 dwellings.

5.36 Paragraph 9.23 relates to phasing and confirms that the Council’s intention is to slow down the rate of delivery, it states “it is necessary to phase the greenfield allocations towards the latter parts of the Plan period so as to maintain a reasonable level of provision in these phases and prevent all housing provision from being built out in the early years of the Local Plan” (underlining is our emphasis). The Council accepts that we are in a housing crisis, and notes that the Standard Method is changing, and uses past completions to bolster its supply; so we are at a loss to understand why the Council wishes to slow down the supply of new homes? The phasing diagram on page 218 of the Local Plan, shown below, confirms that the delivery of homes would be expected to be faster if the Council did not interfere. This is a concern to us, and we ask that the phasing be reviewed to boost the supply of new homes urgently.



Strategic Policy H2 Housing Phasing and Supply

5.37 Policy H2 provides the mechanism for the phasing, and we are concerned that it lists 12 sites, that could deliver homes quickly; but they will deliberately be prevented from doing so by the policy which states “Phasing will be applied to new greenfield housing sites allocated by this Plan, so as to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. The following sites will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land

supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time” (underlining is my emphasis).

- 5.38 We know that there will be a housing shortfall when the NPPF is amended, and even the Council has acknowledged that it would need to start an immediate review of the Local Plan, so we consider that this phasing needs to be removed, and all sites should be able to deliver new homes as soon as they are able.
- 5.39 Paragraph 9.28 confirms the approach to housing distribution at the macro level, it states *“the various settlements have been assessed and a sustainable settlement hierarchy is set out in Policy H3. The more sustainable ‘market towns’ have a higher overall housing provision with new allocations for an additional approximately 100 dwellings each. At the next level, the larger rural settlements, generally require new allocations of 90-100 dwellings each. The smaller ‘intermediate’ rural settlements have modest housing provision, as they do not benefit from significant commitments or completions.”*
- 5.40 Whilst we support the overall aims of Policy H3, we cannot support it entirely. Bishop’s Waltham is correctly identified as a Tier 1 settlement which has a greater amount of key services and facilities; and yet in our view, not enough development is being proposed around Bishop’s Waltham.
- 5.41 It is clear from the number of sites submitted to and assessed by the Council that Winchester City Council can provide further opportunities to accommodate a meaningful portion of the anticipated sub-regional unmet need, including on land around Bishop’s Waltham, being the largest settlement in the District that falls within the PfSH boundary.
- 5.42 As we have demonstrated in these Representations, Bishop’s Waltham, can and should be expected to deliver more homes. Paragraph 14.10 does not capitalise on the sustainability of the place and states that *“it is expected that there is capacity for the development of about 765 dwellings in Bishop’s Waltham”*.
- 5.43 Bishop’s Waltham is a highly sustainable and high order settlement with an excellent range of facilities and services, as identified in the Settlement Hierarchy Report of November 2022 and can provide additional land for development.
- 5.44 In our opinion, Bishop’s Waltham, which is ranked Tier 1 on the settlement hierarchy should be accommodating more growth in order to achieve sustainable patterns of growth.

- 5.45 We object to the fact that the ‘provision’ for new homes is in fact is made up almost entirely from existing completions (340), outstanding permissions (225), remaining local plan allocations (10), a windfall allowance (90) and very few homes on new sites (100).
- 5.46 As we expressed in our Regulation 18 Representations, and as we reiterate here, the NPPF requires a step change, and a significant boost in the supply of new homes, and requires Councils to plan positively.
- 5.47 The reliance on past completions, permissions, old allocations and an overly generous windfall allowance is not positive planning, and frankly, the allocation of only one site, offering only 100 potential dwellings is woeful for a settlement that is scored by officers to be second only to Winchester itself for its level of services and facilities, and overall sustainability as a settlement.
- 5.48 Paragraph 14.9 of the Local Plan acknowledges that Bishop’s Waltham is *“a thriving market town with a locally-based economy and strong community spirit”*.

Concerns with Rareridge Lane

- 5.49 Paragraphs 14.18 to 14.24 acknowledge that the site has some significant constraints, including:
- the site is located *“immediately to the south of the South Downs National Park”*;
 - the site *“has been used for growing trees”* and from our site visit it resembles a woodland;
 - *“West Hoe Cemetery lies immediately to the east”*;
 - The development *“will need to be sensitively designed and managed in order to minimise any potential adverse impacts on the National Park”*;
 - There are *“a number of listed buildings are in the vicinity, including a group of buildings to the south and a cottage to the east. Consideration will need to be given through the design process to minimise harm to the setting of those heritage assets”*;
 - *“a pedestrian crossing would be needed on Hoe Road as there is no footpath on the north side of the road”*;

- *“it will need to be demonstrated through the design process how the needs of pedestrians and cyclists, including safe and attractive routes to, from, and within the site have been connected to the Public Rights of Way (PROW) network and to the nearest public transport stop”;*
- *“development of the site is expected to avoid the highest part of the site, leaving the northern area for amenity space, landscape screening and biodiversity net gain”;*
- *the “exact layout of this site is expected to be determined in a landscape led masterplan fully justified through a design process in accordance with policy D1 and supported by appropriate evidence”;*
- *“The proposals will need to include significant landscaping to mitigate the impacts to the adjacent footpath, countryside, the National Park, and nearby listed buildings”.*

5.50 Overall the Local Plan acknowledges that all of the site’s constraints *“are considered likely to reduce the capacity of the site and it is therefore allocated for ‘about 100’¹ dwellings as a prudent estimate of what can be achieved.*

5.51 ¹The term “about 100 dwellings” is cited in the wording of the allocation in Policy BW4.

5.52 The Rareridge Lane site has an area of approximately 5 hectares, and given the need to secure BNG, a prudent 15 dph assumption would give rise to just 75 dwellings.

5.53 However, in our view, factoring in tree cover, a need to provide landscape buffers, open space and BNG it is prudent to assume a reduced site area of 3 hectares and a 15 dph ratio; therefore the true deliverability of the site is closer to 45 dwellings in our view; which gives greater weight to the need to find more sites in Bishop’s Waltham.

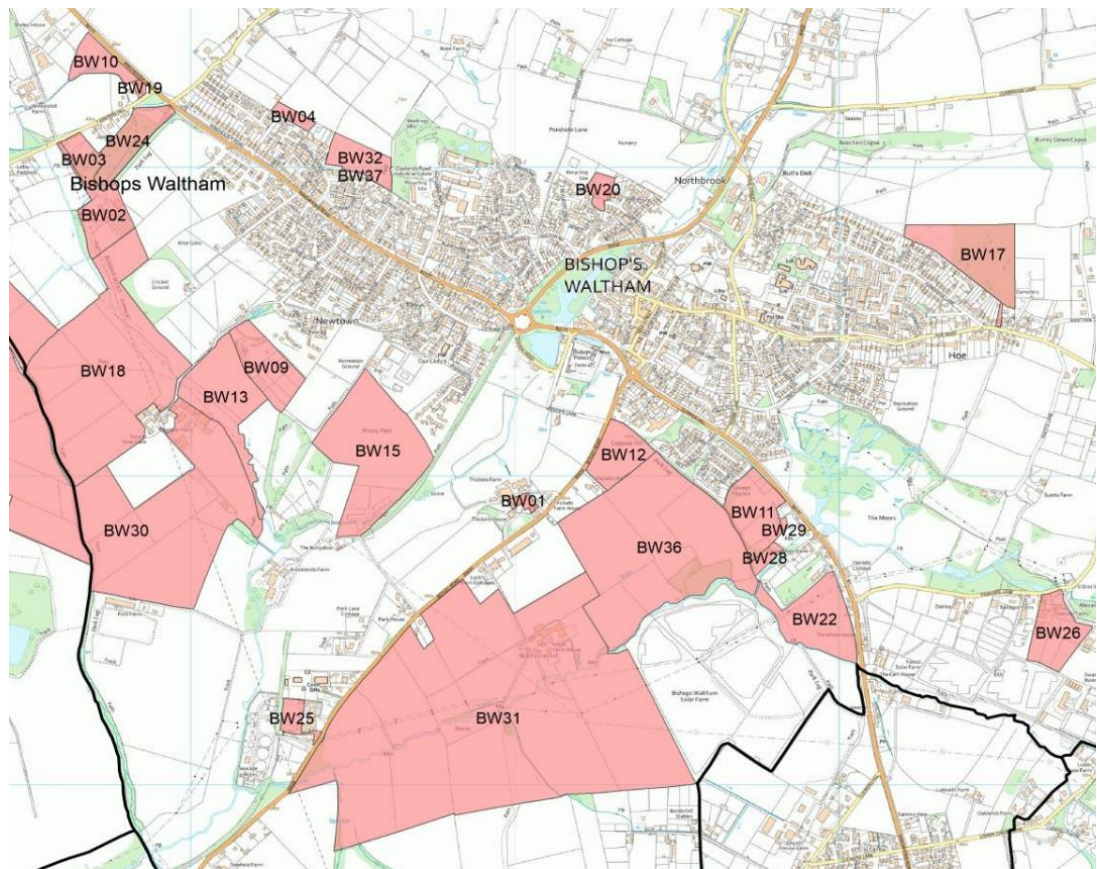
5.54 We are concerned and object to the fact that land north of Rareridge Lane is the only new allocation for Bishop’s Waltham, and as highlighted above, it is located in an unsustainable location on the north of the town where impacts on the South Downs National Park will also be greater. Due to the site’s woodland covering, it is likely to prove very difficult to achieve biodiversity net gain.

5.55 Our primary concern with the proposed allocation of the Land North of Rareridge Lane relates to its poor relationship to the High Street. The walking distance from the centre of

the site to the northern end of the High Street is 1.3 kilometres, which is a 15-minute walk.

5.56 By comparison, the distance from the centre of our client's site to the southern end of the High Street is just 395 metres, which is a 5-minute walk. In our opinion, our client's site is preferable to the allocated site in terms of its inherent sustainable location.

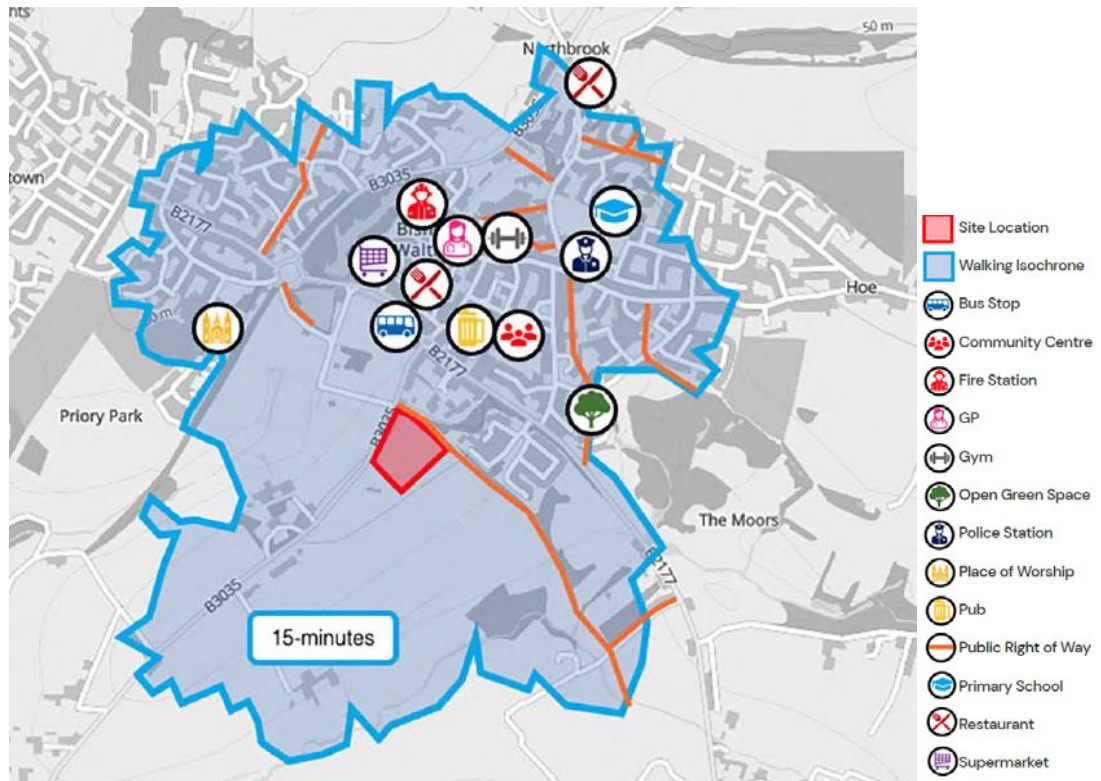
5.57 The extract of the SHELAA mapping provided below shows how the Rareridge Lane site (BW17) sits awkwardly, jutting out towards the South Downs National Park, and located on the hinterlands to the north east of the settlement.



Extent of SHELAA Mapping Showing Sites Promoted

5.58 By contrast, our client's site (BW12) is the only site promoted that benefits from such an enviable location close to the town centre and is situated between dwellings. In this context we consider that the development of our client's site would provide a logical medium-scale in-fill extension of the settlement.

5.59 A diagram taken from the 'Vision' to show the location of the site relative to all of the services and amenities on its doorstep is shown overleaf.



Local services and facilities plan

5.60 We note that the Integrated Impact Assessment (IIA) Report (July 2024) shows the Rareridge Lane site (BW17) and our client’s site (BW12) as having an identical score. We disagree with this, and we invite officers and indeed we will invite the Planning Inspector to visit both sites to appreciate the stark differences and superiority of our client’s site. For ease of comparison, the site assessment scores from the IIA are shown below.


Site Ref.	Parish	Address	Proposed Use	IIA1	IIA2	IIA4	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
BW12	Bishop's Waltham	Land adjacent Crown Hill House, Botley Road	Residential use	+	+	+	+	0?	--	-?	0?	--	0	0
BW17	Bishop's Waltham	Land north of Rareridge Lane	Residential use	+	+	+	+	0?	--	-?	0?	--	0	0

Extract of the Integrated Impact Assessment Showing the Assessments of BW12 and BW17

5.61 Notwithstanding our view that the scores above are incorrect, the superior proximity of our client’s site compared to Rareridge Lane should result in its priority for allocation for new development if the Council is wishing to promote sustainable development and reduce carbon. In our view the site scores for these two sites are as shown below:

Site Ref.	Parish	Address	Proposed Use	IIA1	IIA2	IIA4	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
BW12	Bishop's Waltham	Land adjacent Crown Hill House, Botley Road	Residential use	+	+	+	+	+	-?	-?	0?	-	0	0
BW17	Bishop's Waltham	Land north of Rareridge Lane	Residential use	+	+	+	+	0?	--	-?	0?	--	0	0

5.62 Our client's site was put forward as part of the SHELAA for residential development of up to 68 dwellings. The Assessment made by officers found the site to be deliverable and developable, with no constraints identified, as provided below.

Site Ref	Address		Parish/Settlement	Site Area	
BW12	Land adjacent Crown Hill House, Botley Road		Bishop's Waltham	2.62 ha	
Site Description					
<p>The site is located south of Bishop's Waltham, located to the south of the District. The site is currently in agricultural use. The site is accessed from Botley Road and surrounding uses comprise of residential and agriculture.</p>					
Planning History					
No relevant planning history within the last 5 years					
Suitability					
Environmental Constraints		Historical Constraints		Policy Constraints Continued	
SPA	●	Conservation Area	●	Protected Open Space	●
SAC	●	Historic Park/Garden	●	Mineral Safeguarding Area	▲
Ramsar	●	Scheduled Ancient Monument	●	Waste Consultation Zone	●
SSSI	●	Historic Battlefields	●	Physical Constraints	
SINC	●	Listed Building	●	Flood Zone 2	●
LNR	●	Policy Constraints		Flood Zone 3	●
NNR	●	Countryside (MTRA4)	▲	Other Considerations	
Ancient Woodland	●	Settlement Gap (CP18)	●	Agricultural Land Grade	4
TPO	●	AQMA	●	Previously Developed Land?	No
Availability (legal/ownership issues)					
The site is being promoted on behalf of the landowner has stated that the site is immediately available for development.					
Achievability (economic viability; market factors; cost factors; delivery factors)					
The promoters of the site have not specified any issues regarding the viability in developing the site.					
Potential Density and Yield (including development type)					
Given the sites location within the Countryside a density of 30 dph was applied providing a yield of 68 dwellings.					
Phasing					
0 – 5 Years	68	6 – 10 Years	0	10 – 15 Years	0
Conclusion (deliverable/developable)					
The site has has been scored Green so therefore is deemed as deliverable/developable and is suitable for inclusion in the SHELAA 2020.					

SHELAA Site Pro-Forma for the Appraisal Site

5.63 The site was assessed by officers and scored very well, with a 'green' score applied to all criteria except two, namely:

- The site is currently situated with the 'countryside' - but this is a matter that would be overcome by a proposed allocation of course.
- The site could potentially be underlain with sand or gravel - but the size of the site, its proximity to existing dwellings and a need to retain the existing hedgerows and trees that frame the site would, in my experience make the exploration of and extraction of minerals unviable due to the size of net area, damaging to the environment and undesirable from a residential amenity perspective.

Development Team

5.64 In addition to Bellway Home's in-house team, our client has appointed a full sub-consultant team to promote the site, and this includes planning consultants, heritage consultants, landscape architects and transport planners.

5.65 The team has reviewed the site's potential, and we can confirm that it is our considered view that the site is capable of being developed as part of a heritage and landscape led proposal.

5.66 We, as a team, would welcome the opportunity to work collaboratively with local residents, officers and key stakeholders to explore the full potential of our client's site, but we set out our initial thoughts below.

A Proposed Layout

5.67 As mentioned above the site has a relatively clean score on the SHELAA site assessment with a yield of 68 dwellings, excellent proximity to the town centre; but we acknowledge it is located within reasonable distance from Bishop's Waltham Palace and the Allan King Way PROW on the northern boundary of the site.

5.68 As such, and via a dedicated pre-application submission to Heritage England and meeting with their team, we presented a development proposals for the site that were informed by a strong landscape led and heritage led design concept.

5.69 The proposed vision, proposes a landscape edge to the site, with an arterial footpath and public open space route set between interspersed trees and the retained hedgerows that would provide filtered views between new homes and the surrounding landscape and townscape; and provide an attractive and appropriate buffer to the palace ruins and their

extensive grounds. This approach was welcomed by Historic England and their pre-application comments are appended to these Representations.

- 5.70 We consider that the site can deliver a sensitively designed development, within a well-screened site, with high levels of sustainability owing to the highest standards of construction coupled with the excellent ‘walkability’ of the site.
- 5.71 These Representations demonstrate that our client’s site would represent a valuable opportunity for a sustainably located medium-scale in-fill extension to Bishop’s Waltham, and can be taken forward without causing any significant adverse effect on the local character and without giving rise to any level of settlement coalescence, or harm to the South Downs National Park.
- 5.72 We believe that taking this site forward would contribute to the overall need for 10% of dwellings within the Local Plan to come from smaller sites (as set out in paragraph 69 of the NPPF). Allocation of the site for new homes would also contribute to the increased level of housing land supply that Bishop’s Waltham can and should be providing as part of its role as the largest and most sustainable settlement outside of Winchester itself.
- 5.73 Finally, as the site is located within the PFSH area, it will be ideally placed to contribute to the anticipated increase in Winchester’s level of planned housing land supply that will be required to address the growing level of sub-regional unmet need.
- 5.74 As such, given the climate emergency, the cost of living crisis, the ongoing chronic housing affordability crisis; it is right that planners and place makers should explore further sites that are sustainable and achievable.

Affordable Housing Need

- 5.75 We support the Council’s desire to provide affordable housing via the Local Plan but we are concerned that the Council is not being ambitious enough to truly increase supply to reduce house prices.
- 5.76 Paragraph 2.13 of the Winchester Strategic Housing Market Assessment Update Final Report (July 2024) acknowledges that *“The national market is uncertain and since 2020 after a period of significant inflationary pressures and changes to housing and fiscal policy that have driven house prices upwards, house prices are beginning to fall nationally. In Winchester, there is little indication yet that house prices are beginning to fall, however, the rate at which they had historically been increasing has slowed. Affordability has improved slightly; however, Winchester remains significantly less*

affordable overall when compared to the County, Region, and Country as of 2023, with a tight rental market adding to affordability pressures in the City. Housing delivery in Winchester has improved strongly since 2018/2019. This may be contributing to some of the slower rates of house prices growth seen in recent years in Winchester and should this continue, this will assist in easing affordability pressures in Winchester (underlining is our emphasis).

- 5.77 This paragraph acknowledges that housing delivery has “improved strongly” and yet house process are not falling in line with neighbouring areas.
- 5.78 In our view, this indicates a level of pent-up demand that is not being addressed by the adopted local plan, and we urge the Council to boost the supply of homes; which would give rise to a correlating rise in affordable housing provision.
- 5.79 Regardless of the affordable housing position, it must also be noted and recognised that greenfield sites, such as our client’s site are certain to deliver a policy compliant mix of affordable homes; whereas the percentage of affordable homes is typically lower on brownfield and windfall sites due to competing viability considerations.

6.0 Summary and Conclusions

6.1 The NPPF sets out the tests that the Local Plan will be judged against when examined to assess whether it has been prepared in accordance with the legal and procedural requirements and whether it can be deemed as sound. Local Plans are only 'sound' if they meet the following tests:

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;

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

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

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.

6.2 In our view the Local Plan does not meet these tests for the reasons we have set out in these representations and we summarise below.

Not Positively Prepared

6.3 We do not consider that the Local Plan has been positively prepared as it does not comprehensively address the level of housing need that exists within the Borough.

6.4 There are substantial unmet housing needs within the wider area that should be considered, a larger provision should be made within the Local Plan.

6.5 To meet the requirements of the NPPF, the Council needs to cooperate with neighbouring authorities in relation to housing needs, including the PfSH. The PfSH SPS demonstrates a substantial shortfall of homes across South Hampshire with significant shortfalls in LPAs adjoining the WCC LPA boundary. Put simply, this Local Plan is not a positive response.

- 6.6 In addition, we note that Havant Borough Council and Portsmouth City Council have expressed concerns with the co-operation of Winchester City Council.
- 6.7 The Council has only tested four growth strategies, and in our view there is limited variation in the number of homes above Local Housing Need provision and we note that none of the growth scenarios tested options to boost the supply of homes, instead, they are 'do minimum' options.
- 6.8 The Sustainability Appraisal should be revised and it should test scenarios with higher provision of homes to allow more informed consideration of the implications of providing such levels of growth, particularly in how it might improve affordability.

Not Justified

- 6.9 As we explain above, the Local Plan is not based on an appropriate strategy, and it has not tested reasonable alternatives based on proportionate evidence. As such the Local Plan is not justified.
- 6.10 In our view, the evidence available provides a sound justification to increase the supply of homes and enhance the buffer between housing needs and housing supply. Without such modifications there will be a substantial and ongoing shortfall of housing and affordable housing in the Borough and this will continue to be the case.
- 6.11 The Local Plan should be adjusted, with an increase in the proposed supply of homes to ensure it is justified.

Not Effective

- 6.12 Our concerns regarding the Council's failure in its Duty to Cooperate and lack of commitment for a review lead us to conclude that the Local Plan will not be effective.
- 6.13 In our view the Local Plan is not responding to the PfSH SPS and so it cannot be considered that effective joint working on cross-boundary strategic matters has taken place.

Not Consistent with National Policy

- 6.14 For the reasons given above, the Local Plan does not accord with the National Planning Policy Framework.

- 6.15 We have concerns that the manner in which the Local Plan has been hurriedly prepared for formal submission ahead of the transitional arrangements 'deadline' that it will not be as robust and well evidenced as it should be.
- 6.16 In our opinion, and noting that additional Statements of Common Ground from neighbouring LPAs are still outstanding, and with key responses from stakeholders such as the Environment Agency and Natural England outstanding, there needs to be additional assessments, evidence gathering and further justification before the Local Plan is submitted to the Planning Inspectorate for examination.

Appendix 2 | Historic England Pre-application Comments