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## Winchester Local Plan 2020 -2040

Regulation 19 Publication

# Supporting Statement for Representations

on behalf of

## Mr & Mrs Painter

Citizen Space Representation No.s:  
ANON-AQTS-327T-9, ANON-AQTS-3272-7, ANON-AQTS-3273-8 & ANON-AQTS-327S-8

relating to  
Policies SP2, SP H3, SP H3, BW1 and BW4

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## 1. Introduction

1.1 This statement sets out the detail of Mr & Mrs Painter's Regulation 19 representations on the emerging Winchester Local Plan 2020-2040. It specifically addresses the following policies with their accompanying supporting text and evidence base:

- Strategic Policy SP2 – Spatial Strategy & Development Principles
- Strategic Policy H1 – Housing Provision
- Strategic Policy H3 – Spatial Housing Distribution
- Policy BW1 – The Vineyard/Tangier Lane
- Policy BW3 – Tollgate Sawmill
- Policy BW4 – Land north of Rareridge Lane

## 2. Spatial strategy and spatial distribution

- 2.1 The spatial strategy of the Plan is set out in Policy SP 2 with the spatial housing distribution addressed in Policy H3.
- 2.2 Policy SP2 identifies 3 spatial areas and the development principles for each. One of the 3 spatial areas is the 'Market Towns and Rural Area' (MTRA) which is expected to make provision for 3,850 new homes over the plan period. It is noted that elsewhere in the Plan the MTRA is referred to as accommodating 3825 homes, including in Policies H1 and H3. Clarification is sought from the Council as to which figure it should be but for the purposes of this Statement the figure of 3825 will be used.
- 2.3 Policy SP H3 identifies that 1,375 new homes will be provided by the market towns of New Alresford and Bishop's Waltham, equating to 36% of the MTRA supply. Both towns are well connected community and economic hubs with extensive rural catchment areas, supporting a wide range of services and facilities. In the Settlement Hierarchy Background Paper both settlements are ranked equal second in terms of facilities and services, only 5 points behind the sub regional centre of Winchester Town.
- 2.4 Such locations seem logical sustainable places to accommodate significant future growth and this is recognised in the Settlement Hierarchy Background Paper which states *"Settlements that are in a higher tier of the hierarchy will often be more sustainable locations for new development, because residents would be able to access a greater range of services and facilities more easily, without the need to travel by private car which is the least sustainable form of transport and which adds most carbon emissions, the reduction of which is a key council objective in achieving carbon neutrality by 2030."*
- 2.5 Given the sustainable nature of these settlements it would be expected that they would accommodate significant growth levels in the emerging plan, especially in the period 2024 to 2040. Disappointingly, the Council has limited its ambitions in relation to the Bishops Waltham and New Alresford which are only accommodating 9% of the Plan's total housing provision. Furthermore, Policy H3 and Paragraphs 14.10 and 14.28 indicate that the Council is largely relying on existing allocations, commitments and built developments to accommodate future growth up until 2040, rather than new sites. Confusingly, there are almost 3 times as many houses coming through new sites in the less sustainable Larger Rural Settlements than in the Market Towns and even the Intermediate Rural sites (which are two layers down in the hierarchy) are providing a similar level of houses from new sites as the two Market towns.

- 2.6 In terms of allocating new sites in Bishops Waltham and New Alresford, the Council asked Parishes to only identify new sites for 100 to 120 homes for the period from 2024 to 2040. It is unclear why this limit was placed on the Parishes and why the Plan relies so heavily on existing commitments. It is also unclear why windfalls were seen as delivering 90 dwellings in each settlement, an almost identical amount to the 100 new home allocation in both locations (Paras 14.10 & 14.28).
- 2.7 The current approach reads as a lack of commitment to deliver future sustainable growth in these two market towns. Bishop's Waltham in particular is capable of accommodating additional new housing developments in a sensitive and sustainable way and the Council should reassess the ability of this settlement to accommodate higher housing growth.
- 2.8 Overall, the spatial approach in relation to the Market Towns appears timid and is not considered to be justified or positively prepared.

### 3. Housing need and target

- 3.1 Policy SP H1 sets out a housing target of 15,115 for the district. This is based on:
- a Standard Method calculation for a 20 year period stretching from 2020 to 2040 giving 13,563 dwellings
  - Assignment of 350 dwellings to the South Down National Park
  - Addition of 1900 homes to meet unmet needs in other areas
- 3.2 The Council's use of the Standard Method to calculate its local housing need, and its commitment to meet a portion of unmet need from other areas is applauded and welcomed. However, the Standard Method calculation is based on the current methodology which the new Labour Government has strongly signalled its intention revise in order to significantly boost housing delivery and achieve its ambition to build 1.5 million homes over the next 5 years.
- 3.3 On 30 July 2024 the Government published a Written Ministerial Statement and draft Standard Method and NPPF. These documents indicate a clear directions of travel in terms of national planning policy in relation to meeting housing needs. Paragraph 4 of

the NPPF consultation document states that the government is “proposing a revised standard method which aligns more closely with the Government’s aspirations for the housing market.” In late September the Minister for Housing and Planning Matthew Pennycook warned Councils that he will intervene if councils produce plans with housing targets ‘way under’ their needs. The consultation on the new standard method and revised NPPF recently concluded and it is currently expected that an updated SM and NPPF will be published either toward the end of this year, or early next.

- 3.4 Although the proposed revised Standard Method and NPPF are still at the consultation stage, and thus subject to potential change, the direction of travel is clear and recent appeal decisions have afforded some weight to it.
- 3.5 The Government has helpfully published tables showing what the councils new housing need figures would be if the proposed Standard Methodology were used. In Winchester’s case the current Standard Methodology derived figure of 676 dpa dwellings would rise to 1099dpa, a difference of 423 and almost two thirds more than the existing. Applying this new Standard Method figure to the current plan period would result in a requirement of 21,980 homes over the 2020-2040 plan period for Winchester District. This is 6,865 dwellings above that identified in SP2 and Table H1 of the Plan.
- 3.6 The Council would need to give consideration as to how much of Winchester’s requirement for 21,980 new homes would be allocated to the National Park, and how much of neighbouring authorities needs could still be met. However, even if the unmet needs commitment were dropped and a much higher figure were assigned to the National Park to deliver, Winchester’s housing requirement is still likely to significantly increase.
- 3.7 The Government has indicated that Councils with a “significant gap of over 200 dwellings per annum between the local planning authority’s revised LHN figure and the emerging housing requirement will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF (Chapter 12, para 7). On the basis of the figures outlined above, this need to review the plan before submission would apply to Winchester.
- 3.8 In light of all of the above, it is submitted that the Council should take account of the Government’s new direction of travel and take time to carefully consider whether it

should progress to submission, or instead return to an early stage of plan-making to revise its plan in accordance with the new NPPF before re-submitting.

- 3.9 In this context, the Council will need to keep an open mind regarding the supply of sites that it can draw upon to meet potentially higher housing numbers. This is addressed in the following section.

## 4. Sources of housing supply

- 4.1 Para 70 of the current NPPF (Dec 2023) recognises that medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out quickly. Authorities are asked to promote the development of a good mix of sites and use various tools to help bring medium sized sites forward.
- 4.2 As noted in Section 2 it is considered that the Council have constrained the supply of sites that can come forward in a number of the sustainable settlements in the Market Towns and Rural Area identified in Policy SP H1, including Bishops Waltham. Constraint is being applied via limitations on new allocations coming forward in the 2024 to 2040 period, phasing restrictions and devolvement of delivery to neighbourhood plans.
- 4.3 There are medium sized sites available in these sustainable locations such as Bishops Waltham that could be brought forward quickly in a sensitive manner to help not only with housing delivery, but also re-enforce the vitality of the settlements and further the creation of quality places. One of these sites is the Land to the South of Tangier Gardens in Bishops Waltham. The non inclusion of this site as an allocation in the emerging plan is considered a flaw and unjustified. This, and other concerns, with the Bishop Waltham allocations are considered in more detail below.

## 5. Bishops Waltham

- 5.1 The development of Bishops Waltham and its proposed allocations are considered in detail on pages 391- 404. Section 2 of this Statement has already expressed concern about the low housing numbers being accommodated in the sustainable market towns in the plan period but it is even more concerning to note that Paragraph 14.10 of the Plan identifies that:

- Only about 765 dwellings are expected to be accommodated in the Bishops Waltham in the plan period – around 20% of the allowance for the Market Town and Rural Areas;
- Only 13% of the supply will come from new allocations with a huge reliance on sites that have already been completed, outstanding permissions and remaining allocations.
- Almost half of the supply comes from sites that have already been built.

The inclusion of built out sites in the supply and limited provision for new growth in the 2024 to 2040 period is considered to be lacking in ambition and vision and does not represent positive planning.

## Policy BW1

- 5.2 It is noted that The Vineyard/Tangier Lane is included as an allocation in the Plan under Policy BW1. This is an existing built out site and thus it is surprising to see it included in the plan. This is not good practice or positive planning and is not considered a sound approach.
- 5.3 Normally such a redundant allocation would be expected to be removed from the Plan. However, there is land immediately adjoining the southern part of BW1 to the south-west which is available and demonstrably suitable and deliverable. In light of the District's current and potential future housing need, and the availability and suitability of the site, it would be logical to extend the allocation to include this land. A map showing the extended allocation is contained in Appendix 1.
- 5.4 In order to make BW1 sound the following modifications should be made to the Policy:
- The redline extended to include the land to the south, as shown on the map in Appendix 1
  - The site size adjusted to 3.23ha
  - The indicative number of homes adjusted to 180
  - The expanded site be phased to come forward before 2030
  - The site specific requirements adjusted to focus on the undeveloped portion of the allocation.

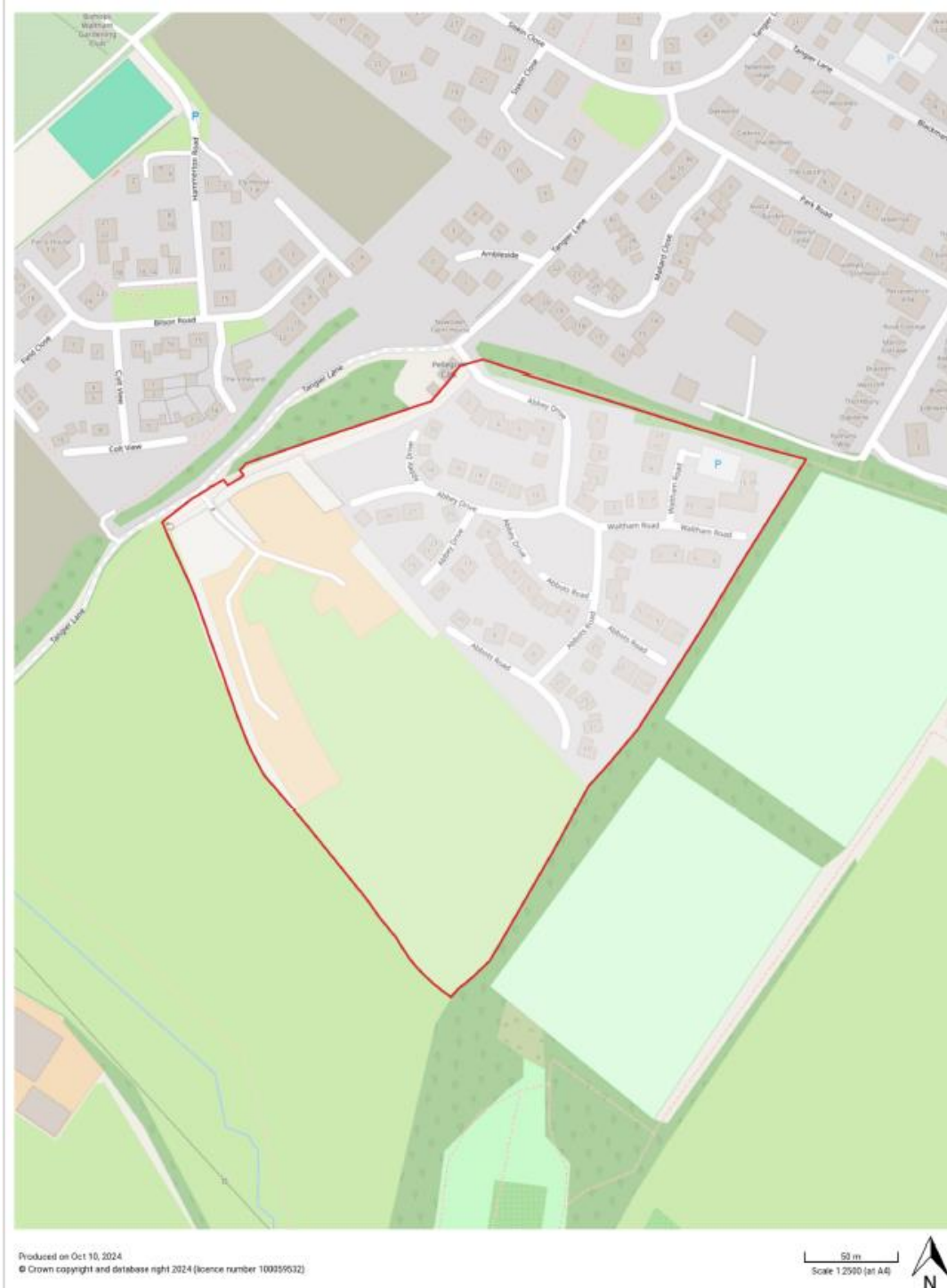
### Policy BW3

- 5.5 The Tollgate Sawmill was identified as a new employment allocation with a limited amount of housing in the 2017 Development Management and Site Allocations DPD. This site has not yet been developed and has been brought forward into the emerging Plan. The Bishop Waltham housing sources table in Paragraph 14.10 identifies that the site will contribute 10 units to the supply in the plan period.
- 5.6 It is questionable whether this site is deliverable. The housing was required to enable the employment uses and the site is currently almost entirely covered in trees and scrub. Its biodiversity baseline is expected to be very high as a result which is likely to making viability even more challenging. It is considered that the site is unlikely to come forward as a result and it should not be relied upon to deliver new housing in Bishop's Waltham in the Plan period. There are alternative sites (such as the extension to BW1) which are suitable and available and which would provide a far more certain and deliverable source of supply.

### Policy BW4

- 5.7 The Plan proposes to accommodate limited new housing growth post 2030 in Bishops Waltham via a single 100 dwelling site allocation at Land north of Rareridge Lane. This approach, and Policy BW4, is not considered to be sound for the following reasons:
- The site represents a major projection into open countryside and would have a form that would be non organic and out of keeping with the existing settlement. Effectively it would be highly visible, backland development rather than a logical organic extension of the existing settlement.
  - The site adjoins the SDNP and the urban development would be highly visible from the Park. The potential to adversely impact on it, and nearby listed buildings is considered significant .
  - There will be a significant number of design challenges to overcome and it is unlikely that the site will come forward quickly. The Plan has also phased the site to come forward after 2030. The site will therefore not meet the Government and Council's objective of significantly and quickly increasing delivery of new housing.
- 5.8 Extension of the Vineyard/Tangier Lane site allocation is considered a more effective and sensitive approach to quickly deliver future housing growth in Bishops Waltham.

## Appendix 1 – Proposed revised BW1 site boundary



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