
Winchester Local Plan 2020 -2040

Regulation 19 Publication

Supporting Statement for representations

on behalf of

Peter Nicholas Homes

Citizen Space Representation No.s:
ANON-AQTS-329C-T, ANON-AQTS-3292-9, ANON-AQTS-3296-D & ANON-AQTS-329G

relating to

Policies SP2, SPH1, SPH2, SPH3, NE7, DEN1 and the Policies Map

1. Introduction

1.1 This statement sets out the detail of Peter Nicholas Homes 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 H2 - Housing Phasing and Supply
- Strategic Policy H3 – Spatial Housing Distribution
- Policy NE7 – Settlement Gaps
- Policy DN1 - Neighbourhood Plan Designated Area
- Policy Map

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 1,570 new homes will be provided by the Larger Rural Settlements that fall within the MTRA. One of the Larger Rural Settlements is Denmead, a large village, close to Waterlooville with its extensive range of facilities and services. In the Settlement Hierarchy Background Paper it ranks 5th of the 49 settlements in Winchester District in terms of the facilities and services it provides.
- 2.4 Denmead seems to be a logical sustainable place 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 Denmead it would be expected that it would accommodate meaningful growth levels in the emerging plan, especially in the period 2024 to 2040. Disappointingly, the Council has limited its ambitions in relation to the Denmead which is only accommodating 330 new dwellings or 8% of the MTRA housing provision. Furthermore, Paragraphs 14.83 and 14.84 indicate that the Council is largely relying on completions, commitments and an existing allocation, to accommodate future growth in Denmead up until 2040, rather than delivering new sites.
- 2.6 In terms of allocating new future sites in Denmead, the Council has given the Parish a housing target of 100 new homes to accommodate through the Neighbourhood Plan process. Although Denmead is considered a sustainable location for accommodating growth it has been limited by Policies H2 and DEN1 to 100 new dwellings in the plan

period. The housing is expected to be delivered through the Neighbourhood Plan process and phased to the latter part of the Plan period – i.e. after 2030. It is not clear why Denmead’s potential future growth has been so constrained, especially when there are sustainable sites on the edge of the village that could be brought forward in the plan period without compromising openness and closing the gap between Denmead and Waterlooville.

- 2.7 The current approach reads as a lack of commitment to deliver future sustainable growth. The settlement is capable of accommodating additional new housing development post 2024 in a sensitive and sustainable way. The Council should reassess the ability of Denmead to accommodate higher levels of housing growth, particularly in light of the need to accommodate acute future housing need.
- 2.8 Overall, the spatial approach in relation to Denmead is overly cautious 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 revised Standard Method and NPPF. These documents indicate a clear direction 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 has 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 Consideration would need to be given by the Council 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 existing 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 Denmead. 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 and strategic sized sites available in Denmead that could be brought in a sensitive manner to help not only with housing delivery, but also to re-inforce the vitality of the settlement and further the creation of quality places. These sites include Furzeley Golf Course /Denmead Driving Range and Furzehill Farm.
- 4.4 Both sites fall within the settlement gap between Denmead and Waterlooville identified in the adopted local plan and re-inforced in Policy NE7 of the emerging local plan. Paragraph 7.60 acknowledges that across the district there are a number of areas of generally undeveloped and open land which help to define and retain the separate identity of settlements. Paragraph 7.61 states:
“In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation”
Policy NE7 states that the Council will retain the generally open and undeveloped nature of the Denmead-Waterlooville gap and that *“only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.”*

It is submitted that there are areas in the current settlement gap that do not contribute to openness and its undeveloped character and should not be included in the gap.

- 4.5 Both the Furzeley Golf Course /Denmead Driving Range and Furzehill Farm sites and their contribution to the gap are considered in more detail below.

Furzeley Golf Course/Denmead Driving Range

- 4.5 Furzeley Golf Course/Denmead Driving Range (known as Furzeley Village) is a 34ha site in Denmead with potential capacity to accommodate a mixed use scheme involving at least 351 homes, extensive green infrastructure and other uses potentially including employment and community facilities. A map showing the extent and location of the site is set out in Appendix 1. Appendix 2 provides a very early Vision document for the site.
- 4.6 The site contains areas of development and parts that could not be considered open. In this context, it could be said to be not fulfilling the function required of it by Policy NE7. Although it lies entirely within the Denmead/Waterlooville settlement gap it represents a logical southern extension to Denmead and it is considered that development could be brought forward in a landscape led manner that protects the separate identities of Denmead and Waterlooville, enhances the quality and accessibility of the space between the settlements and assists at a strategic level with providing for additional housing.
- 4.7 Most of the site is included in the SHELAA as DEN 22 and DEN 23. A large part of it is identified as being deliverable/developable. The proposed extensive green infrastructure proposals set out in the Vision Document in Appendix II would help to reinforce and maintain the gap and facilitate improved public access and enjoyment of it. The scale of the development would be such that it would facilitate a holistic masterplanning approach and sustainable place making, rather than an on-going process of piecemeal development in the settlement.
- 4.8 It is submitted that Furzeley Village should come forward as a strategic allocation in the emerging plan in the form of a settlement extension, rather than being left to the much slower, piecemeal and less certain Neighbourhood Planning process. The non inclusion of the site as a strategic allocation in the emerging plan and the reliance on a Neighbourhood Plan process that has been limited in scope to 100 units is considered both a flaw and unjustified.

4.9 In order to make the Plan sound the following modifications should be made to the emerging Plan policies:

- The housing requirement for Denmead be significantly increased to enable strategic allocations, as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process
- Furzeley Village site be included as a strategic mixed use allocation for Denmead
- Policy SP H2 and DEN1 be amended to allow sites to come forward before 2030
- The Denmead/Waterlooville settlement gap shown on the Policies Map be amended to exclude areas in SHELAA DEN 22 & 23 lying to the south and south west of Denmead

Furzehill Farm

4.10 Furzehill Farm lies to the south of Denmead on Sheepwash Lane. It is a medium sized site south of Newlands Lane and Furzeley village site. A map showing the location and extent of the site is contained in Appendix 3.

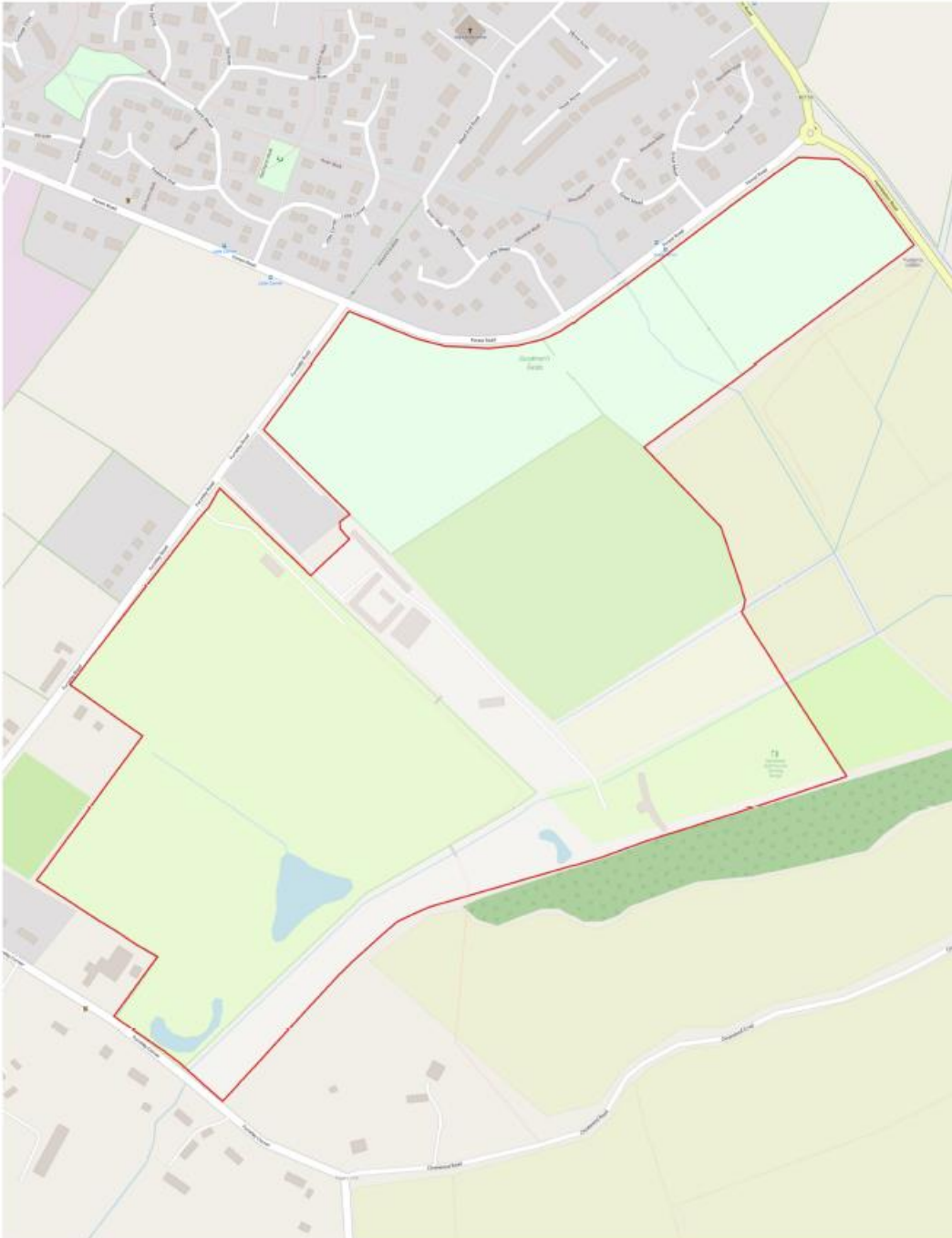
4.11 The site itself is highly developed with a number of buildings and hard-surfaced areas. It is also surrounded by development to the south west and north west of the site and northeast. Although it sits in the Denmead/Waterlooville settlement gap it cannot be considered to be contributing to its open and undeveloped nature.

4.12 The site is available and, due to its size, could be delivered quickly. The site would assist with meeting high housing needs in the area and its development would not compromise the integrity of the Denmead/Waterlooville settlement gap..

4.13 In order to make the Plan sound the following modifications should be made to the emerging Plan policies:

- The housing requirement for Denmead be significantly increased to enable strategic allocations as well as facilitating non strategic smaller sites to come through the Neighbourhood Plan process
- Policy SP H2 and DEN1 be amended to allow sites and Furzehill Farm to come forward before 2030

Appendix 1- Furzeley Village



Produced on Oct 10, 2024
© Crown copyright and database right 2024 (licence number 100099582)



Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA
01243 533633 option 2 planning@henryadams.co.uk henryadams.co.uk



Sales ▶ Lettings ▶ Holiday Cottages ▶ Commercial ▶ New Homes ▶ Professional Valuations ▶ Development Land ▶ Fine Art Saleroom ▶ Rural & Farming

Henry Adams LLP is a limited liability partnership registered in England and Wales No.OC308996. VAT No.846 2465 12. A list of our members and partners is available for inspection at our registered office at Mulberry House, 8 The Square, Storrington, West Sussex, RH20 4DJ. Regulated by the RICS (Royal Institution of Chartered Surveyors).

Appendix 3 – Furzehill Farm

